

## Privacy Policy

### How we use your personal data

This document explains how Pikl use and store personal data relating to potential or actual policy holders, beneficiaries under a policy, claimants and other parties involved in a claim. When we refer to individuals, we include any living person whose personal information we receive in connection with the products and services we provide. Pikl understands how important it is to protect your personal information and we want you to be confident about how we use it. As a regulated company, data controller and data processor we take responsibility for the security and management of your personal information seriously.

### Who we are and how to contact us.

The website is made available to you by Pikl Insurance Services Limited and its subsidiary companies. Pikl Insurance Services Limited has a registered address at Second Floor, The Atrium, Suite B, St Georges Street, Norwich NR3 1AB, with company registration number 10449346.

Pikl Insurance Services Limited is authorised and regulated by the Financial Conduct Authority (FCA) and our FCA registered number is 773457. You can check our registration on the FCA's register by visiting their website [www.fca.org.uk/register](http://www.fca.org.uk/register).

We offer an online quotation service and an online cover service for insurance by means of the website. The types of insurance products featured on the website are arranged and administered by, or on behalf of, Pikl Insurance Services Limited.

Upholding your rights is important to us. Our aim is to make sure our Privacy Policy is clear and simple. For any questions regarding the Privacy Policy, please contact us at [info@pikl.com](mailto:info@pikl.com) or call our advice team on 0800 254 5171.

### Your rights

We want to make it easy for you to understand your rights and empower you to use them.

Under the GDPR, you have the right to:

1. Access any personal data we have on you
2. Rectify any personal data that may be incorrect
3. Object to processing
4. Restrict processing
5. Request to Erase any of your personal data
6. Withdraw Consent (if applicable)
7. Data Portability: the right to a copy of your personal data in a machine-readable format and transfer it easily and freely from us to another company

8. If you feel that we've infringed upon your rights and you wish to lodge a formal complaint about us, please contact our Supervisory Authority at the Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk).

Upon reviewing your personal data, if you determine that certain information is not correct, please contact us. When you make requests for restriction, erasure, or rectification, we will notify you when we have made the necessary corrections or deletions.

While we will make every reasonable effort to comply with your requests, in some cases we will be unable to comply due to other, overriding concerns such as establishing or exercising legal claims, or to comply with an outstanding legal obligation.

If you have any questions or concerns about the personal data we collect, or to exercise your rights under the Data Protection Act 2018, please contact [dpo@pikl.com](mailto:dpo@pikl.com).

If you believe we have not adequately addressed your concerns and you wish to make a formal complaint, please contact our Supervisory Authority at the Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk).

### **How we collect, use, and share personal information**

We only collect information that we need and have strict controls to keep it safe. We collect personal information to provide quotes, products and services to you or your partners. Without the information we collect, we wouldn't be able to give you a quote or an insurance policy and it may affect the outcome of any claims you make, or we will not be able to fulfil our obligations to a third-party when acting as a Data Controller. Personal information we collect will be held in digital and / or paper files.

We collect personal information such as name, address, date of birth, occupation, criminal convictions, claims history, and IP addresses. We'll also collect information which relates to the things you want to insure (for example your house).

Where applicable, we'll collect data relating to criminal offences, including alleged offences, criminal proceedings, outcomes, and sentences (previous criminal convictions, bankruptcies, and other financial sanctions such as County Court Judgements). We collect personal information, including contact details about everybody named on your policy, quote, incident or claim when you:

- provide information for the purposes of attempting or getting a quote
- apply for a policy and when we prepare your renewal quote
- buy and/or use a product or service
- ask us a question
- make, inform us of, or we investigate a claim or incident, including anyone associated with that incident
- make a payment
- update personal details
- change cover
- register a complaint
- take part in market research (e.g. customer satisfaction surveys)
- update marketing preferences

The personal information we collect will be used by us and third parties who process information on our behalf. We may also share your information with some third-party suppliers and subcontractors to assist in the provision of services to our partners. In all cases, we will ensure that your information is safeguarded to the minimum standards outlined in this policy, and that it is not used for any unauthorised purposes. Activities carried out by third-party service providers includes organisations who administer our partner's policy and service their claim.

### **Legal grounds for processing personal information**

We collect personal information to carry out our responsibilities resulting from any business or commercial agreements that are entered into with us.

We collect personal information to provide quotes, products, and services to you or our partners. We do this to enter into and / or perform the insurance contract with you. This includes arranging, underwriting, and managing products, administering third-party policies and handling claims in accordance with the terms of the policy.

As a regulated financial services organisation, we're required to comply with legal and regulatory obligations. This includes meeting our responsibilities to regulators, tax officials, law enforcement and any other legal responsibilities we have such as the prevention, detection and reporting of fraud and other financial crime.

We will process your personal information for our legitimate interests when we have a business reason to do so. This includes but is not limited to:

- developing, improving, and personalising our products, pricing, and services
- enhancing our service and relationship (e.g. market research, business analysis, providing relevant product and service information)
- helping to detect and prevent fraud and financial crime
- developing and improving our administration, security systems and insurance applications
- sharing it with third parties in the event of organisational change (e.g. if we bought or merged with another organisation)
- sharing with third parties for the provision of services where we are acting as a Data Controller
- We use online identifiers to ensure our business services to our partners function properly
- sharing personal information with other Pikl companies when you submit an insurance application and/or claim for the purposes of fraud detection and prevention and analysis of marketing data.

If we need consent to process personal information, we'll ask for this first. This consent can be withdrawn at any time.

By law, we only collect and use special category personal data and / or criminal offence personal data where we have an additional specific legal justification to process such information.

Where we process this type of information we do so for reasons of substantial public interest, including:

- for insurance purposes of advising on, arranging, underwriting, and administering an insurance contract, handling a claim under an insurance contract, and complying with rights and obligations in connection with insurance contracts.
- for the prevention, detection, and reporting of unlawful acts such as fraud and other financial crime.
- safeguarding the economic well-being of certain individuals where we identify additional support required by customers.
- keeping under review the equality of treatment of customers with additional support needs.

It may also be necessary for us to process special category personal data and / or criminal offence personal data to establish, exercise or defend a legal claim including where we're faced with legal proceedings, we bring legal proceedings ourselves or where we're investigating legal proceedings a third party has brought against you.

### **Prospective Insurers**

We will share some or all of the information obtained during the quote process with prospective insurers in order to assess your eligibility and/or process your application to completion. Where your information has been shared with an insurer, they will process the data in line with regulations. You can find details of how they process your personal information in their own privacy policies.

### **Premium Finance**

In order to provide our customers with flexible payment options, we may share your information with a premium finance company. They specialise in financing insurance premiums allowing customers to spread the cost of the payments rather than in a single payment. The information shared is limited to what is necessary for them to carry out their services to you.

### **Cookies**

Technologies such as cookies, beacons, tags and scripts are used by us and our third parties such as analytics or service providers. These technologies are used in analysing trends, administering the website, tracking users' movements around the website and to gather demographic information about our user base. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

Users can control the use of cookies by choosing your preferences when entering our website, or at the individual browser level. If you reject cookies, you may still use our website, but your ability to use some features or areas of our sites may be limited.

Please read more about how we use cookies and what information is collected using cookies in our Cookies Policy.

## **Other Information We Collect**

We only collect information from you to provide services. In UK GDPR terms, that means we have legitimate interests in collecting personal data in order to assess your risk to provide an insurance quotation or to fulfil a third-party contract when acting as a Data Controller. If you purchase an insurance policy then your personal data is retained for the performance of this insurance contract, we use your personal data as part of the contract in providing services. For advertising or tracking cookies on our website, we only place them with your explicit consent. If we do process personal data (e.g. name, email address, IP address), we make sure such processing is in accordance with the UK General Data Protection Regulation (GDPR) and any other applicable regulations.

If we need any additional personal data or wish to use the personal data we already have for a different purpose than originally intended, we will make sure that we inform you that the original use of your personal data has changed and/or re-notify you of our privacy policy and terms at the time the new data is collected.

## **International transfers**

In the event that we process personal information outside the UK, the processing in those locations is protected by UK and European data standards.

If the information you provide to us is transferred to countries outside the UK and the European Economic Area (EEA) by us or our suppliers, steps will be taken to make sure appropriate security measures are in place with the aim of ensuring your privacy rights continue to be protected.

## **The Industry Databases and Institutions we check and exchange information with**

### **Financial crime & fraud prevention agencies**

The personal information, about any customer or third party or representative, we have collected will be shared with crime and fraud prevention agencies, including their members, law enforcement, sanctions lists and other relevant organisations. These organisations use various techniques to assess and validate claims and will use personal information to prevent financial crime and fraud and to verify your identity. If financial crime or fraud is detected, you could be refused certain services.

Where we suspect financial crime or fraud through information obtained because of our investigations, we may cancel any policies you may have with us, retain any premiums paid, be unable to pay any claim or offer you the requested product or service.

### **Regulatory bodies**

Personal information will be used or disclosed as required to regulators, for example the Financial Conduct Authority (FCA), Information Commissioner's Office (ICO) and Financial Ombudsman Service (FOS), to monitor and enforce our compliance with any regulation.

## **No Claims and other databases**

You must tell us about any claim or incident, even if it wasn't your fault. We'll search databases such as the No Claims Discount (NCD) database when you apply for insurance or renew your policy, to validate your no claims discount and claims history (or that of any other person or property likely to be involved in the insurance or claim). We also search and share personal information onto industry fraud databases.

## **Credit reference agencies (CRA)**

To process your application or renewal, we'll supply personal information about you or anyone on the policy to credit reference agencies (CRAs). We do this to assess creditworthiness, and check identity, make pricing and underwriting decisions, manage policies, and prevent fraud and other financial crime. This data will also be linked to the data of any joint applicants or other financial associates.

## **Partner or affinity associations**

If you get a quote or buy through one of our partner or affinity associations, we may pass some of the personal information back to them (e.g. policy details and suspected or proven fraud and other financial crime information).

## **Price comparison or other introductory services**

If you request a quote on a price comparison website or other introductory service, the information you give them is passed to us. We'll also pass personal information (e.g. policy details and suspected or proven fraud and other financial crime information) back to them.

## **Marketing**

We'll use personal information to identify appropriate audiences for our advertisements.

We will send you marketing information by email, post, phone and/or SMS about our products, services, discounts and business updates from Pikl if you've given us permission.

We use your home address, phone numbers and email address to contact you according to your marketing preferences. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email or post.

If you opt out of marketing, this won't stop you from receiving important service-related information that we need to tell you about, for example information relating to your claim, quote or renewal.

## **Communications**

When you contact us, personal information you give us will be recorded and stored on our systems. All calls are recorded. This helps us improve our customer service, train our staff, respond to complaints, and prevent fraud and other financial crime. All communications will be in English. You can get documents in writing by contacting us.

## **Storage and Security**

We use and store the personal data collected for as long as reasonably necessary to provide services, to fulfil our obligations under the Insurance contract and to meet legal requirements. The timeline depends on the relevant service, but generally we will not retain personal data for more than 6 years.