

Privacy Policy

This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

By clicking on "Continue", I confirm that I have read the Privacy Policy of Getsafe UK Limited and that I have read and accepted the initial information provided by Getsafe UK Limited.

Who we are

This privacy policy tells you about how and why we, Getsafe, use personal data of the users of the Getsafe App (the **App**), the users of the website www.hellogetsafe.com/en-gb (the **Site**), the owners of the vehicles our users are seeking to insure and any personal data provided by you when you make an enquiry through email or over the telephone.

Getsafe is the trading name of Getsafe UK Limited. Our company number is 12334612.

We are a 'controller' of your personal data which means we are responsible for deciding how and why we use the personal data we hold about you.

It is important that you read this privacy policy together with any other privacy notice we may provide you when we collect or process your personal data so that you are fully aware of how and why we are using your personal data.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The personal information we collect and use

Information collected by us

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where your identity has been removed (anonymous data).

Personal information we collect includes the following individual details:

- Name and title
- Home address, personal email address, telephone numbers
- Username, passwords or similar identifier
- Date of birth
- Nationality
- Gender

Identification details:

- National Insurance number
- Passport details

Financial Information / Risk details:

- Credit history and credit score
- Criminal convictions or fraudulent activity
- Directors' disqualification orders and undertakings
- Details about payments to and from you and other details of products you have purchased from us.

Anti-fraud information:

- Information obtained through sanctions checks
- Information received from various anti-fraud databases

Other:

- IP address and domain name, location data and other information collected if you visit our Site
- Information about how you use the App or the Site
- Information about your preferences in receiving marketing from us and our third parties and your communication preferences
- Information obtained by other electronic means if you visit our offices, such as door access cards and CCTV footage

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health or genetic or biometric data).

You may provide us with your personal data by corresponding with us by post, phone, email or otherwise or by using the App or filling in forms through the Site. This personal data may be collected when you register as a user of the App, use the Site, contact us about our products or services or you request marketing to be sent to you.

Where we need personal data by law, or under the terms of any contract we enter into with you, and you fail to provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide insurance products to you). In this case, we may have to cancel an insurance product you have with us, but we will notify you if this is the case at the time.

Information collected from and shared with other sources

The App and the Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the App or our Site, we encourage you to read the privacy statement of every website you visit.

ID verification, anti-fraud databases and credit score checks

We use the personal data we hold about you (a) to check that you are eligible to be insured (based on criteria provided by the insurance provider); (b) to generate a quotation for your insurance policy (based on criteria and premium pricing provided by the insurance provider); and (c) as part of our ID verification checks to prevent fraud and identify potential fraud by checking that you are who you say you are.

We use automated processing, including profiling, to do this, although if our system flags up potential fraud, there is human oversight at that stage. If you disagree with any automated decision we make you may have a right to object to that decision. As part of this process we share data you provide to us with specialist third parties who run identity, address and location verification checks, anti-money laundering checks, document authenticity checks, credit fraud checks, checks on the vehicle you are seeking insurance for and checks on your driving licence (**Verification Checks**). They compare the data we provide to them with data from their own or third party sources.

If you'd like details of the relevant fraud prevention agencies and databases we access or contribute to, please contact us by email help@hellogetsafe.com or phone +44 20 2036084144.

In connection with this insurance application, we will review your credit report or obtain or use a credit-based insurance assessment based on the information contained in your credit report. We obtain this information from TransUnion International UK Limited, One Park Lane, Leeds, West Yorkshire, LS3 1EP, United Kingdom.

More information can be found at <https://www.transunion.co.uk/>

Privacy Policy - <https://www.transunion.co.uk/legal/privacy-centre?#pc-bureau>

Payments:

To purchase an insurance policy you will be asked to input your card details. We do not hold this data. We use a third party payment services provider, Stripe, who is PCI compliant, to process this data. You can find out more about Stripe's privacy practices [here](#).

We may also obtain personal information from other sources as follows:

- broker and other insurance market participants such as coverholders, insurance agents, service providers, reinsurers, other insurers, third party agents, legal advisers, loss adjusters and claims handlers
- credit reference agencies and background reference agencies
- antifraud databases, sanctions lists, court judgements and other databases
- government agencies and regulators
- publicly available information such as the electoral register and social media websites
- in the event of a claim, third parties including any other party to the claim (such as a claimant/defendant), witnesses, experts, medical experts, hospitals and other healthcare providers, loss adjusters, lawyers and solicitors, and third party claims handlers.

All personal information collected from these other sources will be processed in accordance with this privacy policy.

How we use your personal information

We will only use your personal information when the law allows us to, which we have more particularly described below. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract, we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal obligation; or

- where you have consented to our processing.

We have set out below a description of the ways we plan to use, or use your personal data, and which of the legal bases we rely on to do so. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out below.

We use your personal information:

- to register you as a new user of the App or customer and to provide insurance services to you (this is necessary for performance of a contract with you)
- to monitor our compliance with the laws and regulations that affect us (necessary to comply with our legal obligations)

We also use your personal information for our own analysis so we can improve our business and ensure we are offering appropriate insurance products which is necessary for our legitimate interests, to:

- better understand our customer make-up and how our customers use the App, the Site and the insurance products purchased via the App;
- measure and analyse the effectiveness of the features of the App and the effectiveness of our customer engagement, advertising and marketing campaigns; and
- improve the services we offer to you and to develop new features and functionality for the App, the Site and related products and to help encourage more effective customer engagement.

Our other uses of your personal information:

In addition to the uses already described above, we will use personal data we hold about you for the following purposes:

- to deal with complaints you make (it is in our legitimate interests, for good customer services, and in order to ensure compliance with legal and regulatory obligations applicable to the insurance industry);
- if you are not a customer to send you marketing and push notifications if you have consented to receiving these or where you are an existing customer we will send you marketing and push notifications about similar goods and services, for our legitimate interests to develop our products and promote our business, unless you opted out of receiving such messages or push notifications at the time we first collected your data or at any subsequent time we contacted you. You can unsubscribe to email marketing by

using the unsubscribe link within the marketing email itself (this is necessary for our legitimate interests to develop our products and grow our business);

- to manage our relationship with you and communicate with you by email, phone, SMS or in-App, where this is necessary for performance of the contract with you or is in our or your legitimate interests (for example, notifying you your policy is coming to an end; or sending you other essential service messages; or responding to queries you sent to us; or collecting feedback; or informing you about special rates and discounts);
- as part of our efforts to keep the App and the Site safe and secure (necessary for our legitimate interests for network security and for the provision of administration and IT services);
- to administer the App and the Site and for internal operations, including troubleshooting, data analysis, testing, research, pricing, statistical and survey purposes (necessary for our legitimate interests for the running of our business, provision of administration and IT services, network security, to prevent fraud);
- to allow you to participate in interactive features of our service, when you choose to do so (consent);
- to create targeted advertising campaigns; (necessary for our legitimate interests to study how customers use our products, to develop our services and to grow our business and to inform our marketing strategy);
- for record keeping purposes (necessary to comply with legal and regulatory requirements and necessary for our legitimate interests to keep our records up to date); and
- to bring or defend legal claims (which is necessary to comply with a legal obligation or is in our legitimate interests to protect and grow our business).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We will process your personal data without your knowledge or consent, in compliance with this privacy policy and data protection laws, where this is required or permitted by law.

Who we share your personal data with

We may share your personal data with the parties, and for the purposes, set out below.

Insurance Provider

The type of personal data we share with the insurance provider is: your full name, age, date of birth, residential address, driving licence details, whether you have any claims or

convictions, policy documents, your Selfie image, vehicle images, your email address and phone number, the car owner's name and telephone number, and the results of the Verification Checks.

When you purchase insurance you are entering into a contact with the insurance provider. We share this information because we need to do so in order for you to enter into a contract for insurance and the insurance provider may use it in connection with any claim you make under your policy.

The insurance provider is a data controller of your personal data and is separately and independently responsible for its use of your personal data. You can find out more about how the Insurance Providers use your personal information by visiting their privacy policy.

Our Principal

We act as an Authorised Representative of Ambant Underwriting Services Limited (Ambant). This means that Ambant, who is authorised by the Financial Conduct Authority (FCA) to provide insurance distribution services, has appointed us to act on their behalf, which enables us to facilitate your purchase of insurance products via the App.

We will share your personal data with Ambant where necessary to allow Ambant to comply with legal obligations it is under (such as FCA regulations) and to deal with complaints.

Ambant also provides services to us to ensure that our practices are FCA compliant. We will share personal data with Ambant to the extent necessary for them to provide those services.

Ambant is separately and independently responsible for its use of your personal data. You can find out more about how Ambant will use your personal data in its privacy notice [here](#).

Complaints and claims

If you make a complaint to Ambant or the insurance provider related to insurance purchased through the App, those parties may share personal information relating to that complaint with us to help resolve the complaint. Similarly if you make a complaint to us, we may share information relating to that complaint with them.

Similarly, if you make a claim under your insurance policy, the insurance provider may share information related to that claim with us.

This is in our legitimate interests to ensure complaints and claims are dealt with properly and to understand how insurance policies purchased via the App are used.

Other data sharing:

We use third party service providers in connection with the fraud and security checks and eligibility and quotation generation processes as described above.

We also use a number of other service providers to help us run our App as efficiently and effectively as possible, which is in our legitimate interests. This includes data hosting providers, customer communications providers, marketing and analytics providers, software developers and branding agencies. We disclose your personal data to them where this is necessary for them to provide those services to us. We require these third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third-party services providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may occasionally be required by law, court order or governmental authority to disclose certain types of personal data. Examples of the type of situation where this would occur would be:

- in the administration of justice;
- at the request of a regulator; or
- where we have to defend ourselves legally.

In the event of a reorganisation, sale or takeover we may need to disclose personal data to new entities within the group or potential or actual acquirers and their advisers. If a change of this kind happens to our business, then the new entities may use your personal data in the same way as set out in this privacy policy.

We may also disclose anonymised data (such as aggregated statistics) about the users of the App and the Site in order to describe sales, customers, traffic patterns and other site information to prospective partners, advertisers, investors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifying information.

We may also need to share data with your personal data with solicitors and professional service firms who act on our or your behalf, or who represent a third-party claimant.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You will receive marketing communications from us if you have requested information from us, registered through the App or purchased products from us and have not opted out of

receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing messages sent to you or by contacting us at any time using the details in the section 'How to contact us' below.

How long your personal information will be kept

We will only hold personal information we collect for as long as reasonably necessary to fulfil the purpose we collected it for, including to satisfy all applicable legal, tax, accounting and regulatory provisions or reporting requirements. We will keep your personal data for a period of 6 years from the date you cease to be a customer, or where you are not a customer, from the date you first provide us with personal data.

In some circumstances you can ask us to delete your personal data: see 'your rights' below for further information.

Reasons we can collect and use your personal information

Under the GDPR, we must always have a legal basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it (legal basis). You can ask us to stop processing your personal data at any time, please see 'your rights' below. However, if you do ask us to stop processing your personal information, there are some situations where we will need to retain some information, but if this is the case we will only keep the minimum information.

Transfer of your information out of the EEA

We may need to transfer your data to insurance market participants or their affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the GDPR. If you would like further details of how your personal data would be protected if transferred outside the EEA, please contact the data protection contact at Getsafe (see 'How to contact us' below).

Your rights

Under certain circumstances, you have a number of important rights under data protection laws in relation to your personal data. In summary, those include rights to:

- access to your personal information to enable you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- require us to correct any mistakes in your information which we hold. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we

may need to verify the accuracy of the new personal data you provide to us.

- require the erasure of your personal information in certain situations. This right enables you to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local laws. We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations. This right only applies to automated information which you initially provided consent for us to use or where we used the personal information to perform a contract with you.
- object at any time to processing of personal information concerning you for direct marketing.
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- object to our continued processing of your personal information where we are relying on legitimate interests and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- request restriction of our processing of your personal information in certain circumstances. This enables you to ask us to suspend the processing of your personal data in the following circumstances (i) if you want us to establish the data's accuracy, (ii) where our use of the personal data is unlawful but you do not want us to erase it, (iii) where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- Withdraw your consent at any time where we are relying on consent to process your personal data. It should be noted that this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products to you. We will advise you if this is the case at the time you withdraw your consent.

If you would like to exercise any of those rights, please:

- email us using the details in 'How to contact us' below;
- write to us using the details in 'How to contact us' below;

- get in touch with us through the App

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). We may however charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

When you exercise any of these rights, we may need to request specific information from you to help us to confirm your identity to ensure your right to exercise any of the rights noted above. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you for further information in relation to your request where necessary to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally, it could take longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data and we appreciate the chance to deal with your concerns before you approach the Information Commissioners Office, so please contact us in the first instance.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioners Office who may be contacted at <https://ico.org.uk/concerns/>.

Changes to this privacy notice

We may change this privacy notice from time to time, whenever you make any material

changes, we will let you know, either through the App, by email or on the Site. This version was last updated on 18 December 2019.

How to contact us

If you have any questions about this privacy notice or the personal data we hold about you then you can contact us:

by email to: help@hellogetsafe.com

OR

by letter to:

Getsafe c/o Ambant
Underwriting Services

7th Floor, 1 Minster Court, Mincing Lane, EC3R 7AA, London

Cookies

The App and the Site uses cookies to distinguish you from other users of the App or the Site. This helps us to provide you with a good experience when you browse the App and the Site and also allows us to improve its performance, by understanding how users use the App and the Site. For detailed information on the cookies we use, the purposes for which we use them and to learn about how to manage cookies, please see below.

Cookies are small files that are saved to your hard disk or to your browser's memory. The cookies used on the App and/or the Site are listed below.

Most Internet browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies or to notify you when a cookie is being placed on your computer or mobile device. If you choose to decline cookies, you may not be able to fully experience the features of the App and the Site or other apps or websites that you visit. Please also note that it may not be technically possible to disable cookies in the App.

Do you need extra help?

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).