# **Privacy Policy**

This is a generic Privacy Policy which applies to both QDOS Accident Assistance Limited (Company number 5179995) and QDOS Insurance Services Limited (Company Number 5650475). These companies may be referred to as "we" or "us" below.

We take your privacy seriously. This Privacy Policy explains how we will use information about you and the steps we take to ensure your information is kept secure and confidential.

Please read this Privacy Policy carefully. If you use our Website or any of our services, you will be regarded as having read and accepted this Privacy Policy. You must not use this Website or our Services if you do not accept this Privacy Policy. Please be aware that this only applies to our website and not any websites that can be accessed from our website including but not limited to any links we may provide to social media websites.

QDOS Insurance Services Limited is the data controller under the Data Protection Act 1998 in relation to the processing of your personal data in connection with Insurance Services. Qdos Accident Assistance Limited is the data controller under the Data Protection Act 1998 in relation to the processing of your personal data in connection with anything else. The registered office of both companies is Higsons Chartered Accountants, Offices 1 and 2, 1A King Street, Farnworth, Bolton, BL4 7AB.

If you have any queries relating to our use of your personal data or any other related data protection questions for any Company in the Group, please contact our Data Protection Officer at <a href="mailto:dpo@qdosassist.co.uk">dpo@qdosassist.co.uk</a>

#### 1) The information we collect

We collect personal information about you when you give this to us in the course of registering for and/or using our Website or services. In the course of providing our services to you, we may also store information about how you use our Website, for example, the pages viewed, the website from which you came to visit our Website, changes you make to information you supply to us, details of the quotes you request and your transactions, together with details of your financial information, for example, bank account or payment details.

Telephone calls that you make to our customer services help line on 0800 440 2417 (QDOS Insurance Services Limited) or 0800 093 0892 (QDOS Accident Assistance) may be monitored and/or recorded.

We will periodically review your personal information to ensure that we do not keep it for longer than necessary and that is permitted by law.

## 2) Purposes for which we use information about you

We may use your personal information for the following purposes:

- 2.1 to enable you to access and use our services; and/or
- 2.2 to personalise and improve aspects of our overall service to you and our other users, as well as carrying out research such as analysing market trends and customer demographics; and/or
- 2.3 to communicate with you, including sending you information about products and services which we think may be of interest to you, and sending you annual insurance renewal quotes based on information you previously provided to us if you have requested insurance quotes; and/or 2.4 to process a transaction between you and a third party.

2.5 We may share aggregated information that contains no personal information to third parties.

### 3) Passing on information about you

In connection with the services that we offer, your personal information may be disclosed to the following parties:

- 3.1 Third parties whose products or services are included on our website with a view to providing you with an online quotation for the product and/or service requested by you. We ensure that when third parties assist us in processing your personal information that they comply with this privacy policy and any other terms we specify to protect you. Some third parties with which we share your information may use it to carry out research such as analysis of market trends and customer demographics and to customise and develop the product/service which they offer to you or other individuals in the future.
- 3.2 The Financial Conduct Authority and/or other regulatory/governing bodies for the purposes of compliance monitoring;
- 3.3 Selected other third parties whose products, services or other offers we believe may interest you (provided you have opted in to give the necessary consent);
- 3.4 If you use our services to search for and compare insurance products, the information you provide may be used to carry out certain credit checks through licensed credit-referencing agencies. This is used as part of the underwriting process for some of the insurance providers and a record of this search will be made although this will not adversely affect your credit profile.
- 3.5 Where permitted by data protection and privacy law, we may also disclose information about you, or access your account:
- 3.5.1 if required or permitted to do so by law; and/or
- 3.5.2 if required to do so by any court, the Financial Conduct Authority, the Office of Fair Trading or any other applicable regulatory, compliance, Governmental or law enforcement agency; and/or
- 3.5.3 if necessary in connection with legal proceedings or potential legal proceedings; and/or
- 3.5.4 in connection with the sale or potential sale of all or part of our business or the company.
- 3.6 If we reasonably believe false or inaccurate information has been provided and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering.

## 4) Keeping you informed of offers and services

By giving your opted in consent, you agree that we and other trusted third parties shall be entitled to advise you via e-mail, post, telephone or by text of products, services and other offers we think may interest you. For example, we may e-mail you letting you know how you could save money by changing products and services.

Whenever you provide us with personal information, we will give you an opportunity to tell us whether or not you give consent to us and other trusted third parties using and sharing your information for marketing purposes.

Any electronic marketing communications we send you will include clear and concise instructions to follow should you wish to unsubscribe at any time.

Should you no longer wish to be contacted by us, you can advise us at any time by contacting our Customer Services team on 0800 440 2417 (lines are open Monday to Friday 8.00 to 6.00) or by

sending an email to enquiries@qdosinsurance.co.uk

# 5) Third party providers and data privacy

If you decide to enter into a contract with a third party provider through this Website, the information you have provided to us together with any further information requested by, and supplied by you or us to the third party provider will be held by the provider for the purposes set out in that provider's privacy policy and in accordance with GDPR regulations. If however you click on a link on our website to another parties website we have no control over this and you are strongly advised to read their privacy policy or statement prior to using them.

#### 6) Cookies

A cookie is a very small text file placed on your computer. Cookies help us to:

- 7.1 understand browsing habits on this Website;
- 7.2 understand the number of visitors to this Website and the pages visited; and
- 7.3 remember you when you return to this Website so we can provide you with access to previously saved quotes.

Most cookies are deleted as soon as you close your browser, these are known as session cookies. Others, known as persistent cookies, are stored on your computer either until you delete them or they expire. By using this Service, you consent to us using cookies.

You can choose to block or delete cookies through your browser settings. If you decide to block or delete our cookies, you will not be able to benefit from the full range of our Services and this may affect the performance of our website on your system.

## 7) Security

Keeping information about you secure is very important to us. However, no data transmission over the internet can be guaranteed to be totally secure. Therefore, whilst we strive to protect your personal information, we cannot ensure or warrant the security of any information which you send to us, and you do so at your own risk. In addition, you must keep secure any username and password which you create when registering for the Services, we suggest you change your password the first time you log in.

## 8) Transferring your information abroad

Information supplied by you to us will only be transferred outside the European Economic Area by us or our agents where this is necessary for the purpose of performing obligations to you, or when you have given your prior consent to such transfer.

## 9) Your Rights

The GDPR provides the following rights for individuals:

9.1 The Right to be informed – you have the right to be informed about how we use the information you have provided us with. This is covered within this privacy policy and is available upon request.

- 9.2 The Right of access you have the right to access all personal data that we hold about you. To access such information, we request that you provide us with a Subject Access Request.
- 9.3 The Right to rectification you are entitled to have personal data rectified if it is inaccurate or incomplete. We will respond within one month.
- 9.4 The Right to erasure you have the right to erasure in certain circumstances.
  - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
  - When you withdraw consent.
  - When you object to the processing and there is no overriding legitimate interest for continuing the processing.
  - Your personal data must be erased in order to comply with a legal obligation.

We may refuse to comply with a request for erasure in rare circumstances such as in the event of exercise or defence of legal claims.

- 9.5 The Right to restrict processing you have the right to block or suppress processing of your personal data. When processing is restricted we are permitted to store your personal data but not further process it. We will retain just enough information about you to enable that the restriction, as directed by you, is respected in the future.
- 9.6 The Right to data portability you have the right to request the movement, copy or transfer of your personal data easily from us to you or your requested destination in a safe and secure manner.
- 9.7 The Right to object to processing based on legitimate interest or direct marketing.
- 9.8 The Right to complain you have the right to complain to us if you feel your data has been processed incorrectly, been misused or we have not met your data processing expectations. How to complain? Please see our complaints policy on this website.

### 10) Your responsibility for the information you provide

You may complete a registration process as part of your use of this Website which may include the creation of a username, password and/or other identification information. Any username, password and/or other identification information must be kept confidential by you and must not be disclosed to, or shared with, anyone. Where you do disclose to or share with anyone your username, or password and/or other identification information, (or someone other than you discovers your password and/or identification information other than through a breach by us of this Privacy Policy) you are solely responsible for all activities undertaken on this Website using your username, password and/or other identification information.

You must check and ensure that all information, content, material or data you provide on this Website is correct, complete, accurate and not misleading and that you disclose all relevant facts.

We may also need to collect information from you about other individuals, e.g. additional named drivers if you request a car insurance quotation. By submitting another person's details you are confirming to us that you have their permission to do so and that they understand how their details will be used.