

Tempcover Limited ('Tempcover' and 'we/us/our') is committed to ensuring that your information is used and kept securely in line with the General Data Protection Regulations (GDPR).

Under the Data Protection Act (DPA) Tempcover Limited are the 'Data Controller' and we are responsible for, and control the processing of, your personal data.

Tempcover Limited are registered with the Information Commissioner's Office (ICO) under registration number ZA178918. Tempcover is part of the ZPG Limited group of companies, comprising ZPG Limited and its subsidiaries (the "ZPG Companies").

By submitting your information to the Tempcover Site ("Our Site") you are consenting to the processing of your information by us and our agents in accordance with this Privacy Policy.

### 1. Information We may collect about You

When you use our site or speak to one of our customer service agents to obtain an insurance quotation, we may collect and process the following information about you ('Your Information') to calculate the premium and understand your insurance needs including:

- Information that you provide when you visit our site, register for and use our online services, become
  a subscriber, request a quote or apply for any other product or service.
- o Information that you provide to our partners, brokers and affiliates where you have consented to that information being passed to us.
- Information you provide to us when you contact us by email, SMS, telephone, letter or via our live chat service.
- o Information from the electoral roll register, credit reference agencies, and fraud prevention agencies.
- o Information about Claims from the Claims Underwriting Exchange.
- Information about your Driving history from the DVLA.
- o Information you provide if you report a problem with our site or if you contact us and request assistance when using our site.
- Details of your visits to our site including but not limited to traffic data, location data, web logs, IP address (a unique identifier for your computer or other access device), as well as other communication data, whether this is required for our own purposes or otherwise and the resources that you access.

We do not collect sensitive personal data for the purpose of processing an insurance quote or policy.

#### 2. How We use Your Information

We use Your Information in the following ways:

- o To identify a product provider and arrange for the provision of products and services requested by
- To calculate an insurance quotation to meet your requirements.
- o To contact you and any person referred to by you in connection with your application or enquiry.
- o To process and respond to requests, enquiries and complaints received from you.
- To update our records.
- To communicate with you about products and services provided to or requested by you. Based on the interest you have shown and on the grounds of legitimate interest, we will send you details of your

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- quotation by email and/or SMS.
- o If you choose to receive Tempcover direct marketing communications we will keep you updated with our latest customer discounts and promotions. We will only ever contact you via the method you permit us to do so (via email and/or SMS). Should you choose to receive our marketing communications you will always be given the opportunity to change your mind and opt-out at any time by following the opt-out instruction within the email or SMS. Alternatively, we can do this for you. Simply email us at contactus@tempcover.com.
- To analyse trends and profile and carry out assessment and analysis (including credit and/or behaviour scoring, market and product analysis).
- For audit purposes.
- To carry out customer satisfaction research in order to improve our products and services.
- To prevent and detect fraudulent quotes, policies and claims.
- o To meet our regulatory compliance and reporting obligations.
- To ensure that content from our site is presented in the most effective manner for you and your device.
- To develop and improve our services to you and notify you about changes to our services.
- o To enable third parties to carry out any of the above purposes on our behalf.
- Your information may be shared with our partner claims management company who may access your information to validate your insurance policy for the purpose of handling your claim.

We may share Your Information with and obtain information about you from LexisNexis/Insurance Initiatives Ltd, a credit reference agency. Please note that any searches undertaken are soft searches and will not affect your credit rating.

We may use your personal data to make decisions about you using computerised technology to profile you, such as assessing which products and services might be of interest to you. We will retain any information we have collected about you for up to 7 years after our professional relationship has terminated, however, data held electronically may be retained for longer.

For more information about how we use your information please read our "Cookie policy".

Our legal basis for processing your personal data for the purposes described above will typically be one of the following:

### o Contract

It is necessary for us to process your personal data to perform a contract to which you are a party, or to take steps at your request prior to you entering into a contract. If no personal data has been received, we could not proceed a request or perform a contract with our customer.

## Consent

You have consented to us using your personal data for this purpose (for example, when you agree to our use of cookies for particular purposes). You can withdraw your consent at any time by updating your consent preferences in our App or website.

# Legitimate interests

There are certain circumstances where we process your personal data for our legitimate business Tempcover Privacy Policy – Direct v 1. Jan 2023

interests. These can be for commercial or societal reasons. In order for us to process your data, we'll always balance our interests against your own to ensure it's fair.

Sometimes, we may process your personal data when it is in the legitimate interests of another company, such as another ZPG Company.

Legal obligations

It is necessary for us to use your personal data for us or another ZPG Company to comply with a legal obligation.

### 3. Sharing of Your Information

We may share Your Information with third parties in the following ways:

- We sometimes use agents and service providers to process your information on our behalf. For example, we may use third parties to maintain our IT systems. Where we use agents and service providers to process your information, we will ensure that they have adequate security measures in place to safeguard your information.
- o If you have requested an annual car insurance quote from confused.com, then your information will be shared with confused.com. As part of the confused.com price comparison service, this information along with any data you previously shared with confused.com when obtaining your last quote (dated in the last 36 months) will be used by their partners in order to provide you with an updated personalised car insurance quote. We will release your personal information when we are required to do so for legal or regulatory purposes or as part of legal proceedings.
- We may give information we hold about you to third parties as part of the process of selling one or more of our businesses.
- We will never share your information with third parties for marketing purposes without first gaining your express consent.
- We may transfer your information to our partners, brokers or third parties (e.g. insurers) for the purposes of assessing and processing your application.
- We may also share your information with associated companies within our group.
- We may capture your data within a session replay tool, which provides us with valuable analytical data to enable us to improve the customer journey and investigate any issues that may arise. Full Story who provides this tool are based in the USA and safeguard your data to the standard required by GDPR.
- We use New Relic who are a software solutions company who help website and application owners track the performance of their services. Tempcover use this service for monitoring purposes such as debugging, testing and improving your user experience. We may capture your data within New Relic which helps us create a better customer experience and diagnose issues. By using Tempcover's products and services you consent to the use of New Relic for the purposes stated above.
- o If you contact us via our live chat platform, provided by Intercom, any information that you provide will be stored within the platform to enable us to fulfil the live chat service.

You confirm you have the consent of any other person whose details are provided by you in connection with your application or enquiry to provide that person's information to us and for us to use that person's Information in accordance with this Privacy Policy.

If false or inaccurate information is provided, including in relation to a person's identity and fraud is

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suspected or identified, details about this information, including customer Personal Data, will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent and detect crime, fraud and money laundering, for example when: recovering debt, checking details on proposals and claims for all types of insurance.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. For further details of the relevant fraud prevention agencies please contact us as described at the end of this Privacy Policy.

#### 4. Where We store Your Information

In some circumstances Your Information may be transferred to, stored and processed by us or a service provider, or third party with whom we share Your Information in another country including countries outside the European Economic Area such as the USA. Data protection safeguards may not be as high as they are in the UK, however we ensure, as far as possible, that adequate procedures are put into place to protect your Information.

Whenever we transfer personal data outside the EEA, we will ensure a similar degree of protection is afforded to it by ensuring appropriate safeguards, as required by law, are in place. This may include using standard contractual clauses which contain specific terms to make sure that the data is being used correctly when sent internationally.

All information you provide to us is stored on our secure servers which are hosted by an ISO Accredited Data Centre supplier. The Data Centre do not pass your data outside of the UK.

Where we have given you (or where you have chosen) a username, Personal Identification Number (PIN), and/or passcode which enables you to access certain parts of our site, you are responsible for keeping this username, PIN, and/or passcode confidential. You must not share these with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to our Site, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### 5. Your Rights

# Your Right to Access your Data:

You have the right to request access to the personal data that we hold for you. This formal request is made under the DPA and is referred to as a Subject Access Request. If you wish to exercise this right and make a Subject Access Request, you should:

- Put your request in writing, either by email to <u>contactus@tempcover.com</u> or letter with the subject heading: Subject Access Request.
- o Include proof of your identity and address (e.g. a copy of your driving licence or passport and a recent utility bill).
- Specify the personal data you want access to, including any reference numbers where applicable.

# Your Rights of Data Rectification:

You have the right to ask us to correct any inaccuracies in your data free of charge. If you wish to Tempcover Privacy Policy – Direct v 1. Jan 2023

exercise this right, you should:

- Put your request in writing, either by email to <u>contactus@tempcover.com</u> or letter with the subject heading: Data Rectification.
- o Include proof of your identity and address (e.g. a copy of your driving licence or passport and a recent utility bill).
- Specify the information that is incorrect and what it should be replaced with.

# Your Rights to Object to Direct Marketing:

We will always give you the opportunity to 'unsubscribe' from receiving marketing emails.

You have the right to ask us to stop processing your personal data for direct marketing purposes. Objecting to direct marketing will mean that we be unable to contact you about carefully selected offers and promotions on temporary insurance. If you wish to exercise this right, you should:

- o Follow the 'unsubscribe/opt-out' link in your email or SMS.
- Put your request in writing, either by email to <u>contactus@tempcover.com</u> or by letter with the subject heading, Unsubscribe.
- o If your objection is not to direct marketing in general, but to direct marketing by a particular channel (e.g. email or SMS), please specify the channel you are objecting to.

#### Your Rights to Data Portability:

You have the right to ask us to securely transmit your data to another provider, where possible, in a commonly used and machine-readable format.

- Put your request in writing, either by email to <u>contactus@tempcover.com</u> or letter with the subject heading: Data Portability.
- Include proof of your identity and address (e.g. a copy of your driving licence or passport and a recent utility bill).
- o Details of the Data Controller and where you would like your data ported to.

## Your Rights to Data Erasure:

You also have a right to "be forgotten", this means you can ask for the information which we hold about you to be deleted from our records. Proof of identification may be required to locate and confirm your details. If you wish to exercise this right, you should:

- Put your request in writing, either by email to <u>contactus@tempcover.com</u> or letter with the subject heading: Data Erasure.
- Include proof of your identity and address (e.g. a copy of your driving licence or passport and a recent utility bill).

Erasing your data will mean that we will be unable to continue to handle your insurance arrangements. Data erasure requests will be handled in line with our retention periods. For all data requests, we will respond within one month of receipt of your request.

# Your Rights to Complain:

You have a right to complain to the Information Commissioners Office (ICO) if you feel that Tempcover Ltd has not adhered to your rights or you have concerns about the way in which Tempcover Ltd has handled your data.

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More information can be found at <a href="https://ico.org.uk/your-data-matters/">https://ico.org.uk/your-data-matters/</a>

#### **Contact Us**

If you wish to query any of the information provided in this privacy policy or how to exercise your rights, please contact our Data Protection Officer by email at: <a href="mailto:dpo@tempcover.com">dpo@tempcover.com</a> or write to us at:

2<sup>nd</sup> Floor Admiral House Harlington Way Fleet Hampshire GU51 4BB

# 6. Accessing Other Sites

Our Site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

# 7. Updates

We may update this Privacy Policy from time to time. Please ensure that you check Our Privacy Policy regularly for updates. Last updated 26 January 2023.

If you still have any concerns about privacy, please contact us via our online contact service.

## 8. Security

Tempcover.com uses Secure Server Certificates to ensure that all information submitted with your application, including credit or debit card details, is secure. We do not store your credit or debit card details.