RVU Services Limited and its group companies, which trades under the names of "RVU", "Confused.com", "Money.co.uk", "Tempcover.com", "Uswitch.com", ("we", "us" or "our") wants to protect your privacy.

Scope

This privacy notice tells you about the kinds of data we obtain about you, how we use it, and why, so please make sure you read it. When we talk about our "services", we mean all of the websites, apps, products, and services we provide through our brand(s) and by other means.

We may provide further disclosures for some services, and these should be read in addition to this notice.

Our services may contain links to external sites. We do not control these sites and encourage you to read their privacy notices.

About us

We are RVU Services Limited and we are a controller of the data that you share or that we collect about you. This means we oversee how your data is processed.

RVU Services Limited is part of the RVU Group, which also includes the following other businesses:

- Dot Zinc Limited. The Cooperage, 5 Copper Row, London, SE1 2LH
- Inspop Limited. Greyfriars House, Greyfriars Road, Cardiff, South Wales, CF10 3AL
- Tempcover Limited. Admiral House Harlington Way Fleet Hampshire GU51 4BB.
- Uswitch Limited. The Cooperage, 5 Copper Row, London, SE1 2LH

When we use your personal data, we will be a joint controller with one or more of these businesses, meaning that together we decide how and why to use your personal data. However, RVU Services Limited remains responsible for your personal data, and we should be your point of contact for any questions. You can read more below about how we share personal data within the RVU Group.

RVU Services Limited and other RVU group companies are a division of <u>ZPG Limited</u>. Any reference to the ZPG Group within this notice includes all or any of RVU Services Limited's direct or indirect parent or subsidiary undertakings.

You can contact our Group Data Protection Officer at <u>dpo@rvu.co.uk</u> or via our postal address below. Please mark your letter: 'RVU Data Protection Officer'.

From time to time, we change this notice. We will post any changes to this page, so please check it often.

What personal data do we collect?

When you use our services, we collect data. You give us data when using our services (such as your name or email address) and some data we collect automatically.

We collect only the data necessary for specific purposes that the law allows.

Data you provide to us.

To use our services, you must share some of your data with us. For example, you may provide data to enter into a contract or competition, to use our services, purchase a product, to make a complaint, or ask for help. Typically, you might share things like:

- Name or username
- Date of Birth
- Gender
- Email address
- Residential address
- Billing address
- Phone number
- Payment details
- Car make and model
- Driving licence

Where you provide us data you do so on your own behalf, or where providing us with someone else's data, that you have their consent to do so

We may need certain sensitive data to provide some services (like health data). When we need to use your sensitive data, we may need to ask for your consent. If you do not consent to this use, you may not be able to use that service.

You may also choose to share other data with us, such as comments, interests, likes and dislikes, and survey answers.

Data we collect about you.

When you use our services, we collect some data automatically. The data we collect will depend on the service you use, but it includes things like:

- Cookies and other online IDs
- Website visit length, clicks, page views, and other actions
- ISP and IP address
- Device and browser data
- Emails from us you have opened and / or clicked

Data from our other RVU services.

If you use any of Confused.com, Money.co.uk, Tempcover.com or Uswitch.com, we will combine your data from across these services for the purposes set out in this Privacy Notice.

Data we get from others.

If you use other ZPG services, we may get data about that use.

We work with third parties, who help us provide and market the services we offer. Some of these provide us with the data we need to operate our services (for example, we may obtain data about your credit status, estimated energy use, or likely interests).

Where our services allow you to look up data (for example, using house number and postcode to get property information), you may only use the service if all parties whose data you are searching agree. If you do not have this consent then you must not use the service.

For the purposes of short-term motor insurance, we may collect information about your driving licence in order to check your driving history, and any motoring convictions, with the DVLA.

Data we create.

We may combine the data we have to create new data. The data we create about you will depend on your use of our services, but it may include:

- Approximate location
- Inferences about your interests and product preferences
- Interest cohorts
- Linked devices

Please note: We do not use the data we collect to infer sensitive data about you.

How do we use your data?

We use data for purposes connected with serving you and operating our business.

Depending on your use of our services and the choices you make, we will use your data for the following.

Providing our services and carrying out your requests.

When providing our Services we may use your data (as applicable):

- To check your identity and eligibility for our services.
- To register and secure your account.
- To enable you to obtain your supplier and estimated use, to help make energy switching easier.
- To help you find our best pricing and products.
- To direct you to the websites of our partners.
- To process transactions between you and us, or our partners.
- To track sales and get paid by our partners.
- To build profiles of your use of ZPG services, and personalise your service.
- To keep your data updated.
- To ask for the cancellation of your products with third parties (where possible), when you have asked us to.

- To provide customer service and support.
- To enable you to use social sharing tools.
- To complete data rights requests you have made.

Improving and promoting the services of us and others.

To help improve and promote our services, and the services of our partners, we may use your data:

- To carry out analysis and market research.
- To help present our services clearly and in the most effective way.
- To run competitions, incentives, and surveys.
- To help us and our partners create better products for you.
- To process any rewards we may offer to you.
- To send updates and service messages about your products and services.
- To let you know about our services and promotions by email, social media (e.g., Facebook), SMS, and using push notifications (where you agree).
- To let you know about other RVU and wider ZPG services.
- To build, train, and augment models which help us understand your likely interests and those of others.
- To target advertising to you, on this and other websites, based on data we have collected or created.
- To help us understand if and how our and others marketing works.

Please note: We do not use profiling in a way that could have legal or similar effects (like deciding whether and how much credit you might get).

Operating our business.

In the course of running our business we may use your data:

- To do the things that are necessary for running our services and business.
- To help secure our business and prevent fraud.
- To create reports for internal or external purposes.
- To comply with the legal and regulatory obligations that apply to us.
- To audit our business and processes.
- To protect the interests of our business, and those of our partners.
- To help assess any assets we may buy or sell.
- For other purposes not described in this privacy policy that you consent to (from time to time) and as otherwise permitted by law.

Please note: We may combine your data with the data of others (e.g. a count of the total number of website users per day). This data we create by doing this cannot be used to single you out and is not personal.

Why can we use your data?

To use your data, we must have a valid reason (a "lawful basis").

Sometimes we ask for your consent (e.g., to use some cookies) and sometimes, where you would expect us to use your data, we do not need to ask.

Our reason for using your data is usually one of the following:

Contract

We must use your data to carry out a contract you are party to or take steps before you enter a contract.

Consent

You have given us consent to use your data for a certain reason (you can revoke your consent at any time).

Legal obligation

We (or another ZPG company) must use your data to follow the laws or regulations to which we are subject.

Legitimate interests

We have a legitimate interest in using your data. Usually this is to help us run, improve, promote, or protect our services and business.

Examples of these interests include:

- Sharing data with our suppliers so they can give you quotes.
- Sharing data with our suppliers, so you do not need to re-enter it.
- Sharing data with suppliers who help us offer our rewards and benefits.
- Providing you with energy data about your property.
- Providing email summaries of quote results, when you use our services.
- Contacting you to provide renewal quotes.
- Contacting you to do market research about our and other services.
- Auditing our processes to help keep our high standards.
- Market research, statistical analysis, and product development.
- Securing our services and keeping them online.
- Fraud prevention.

Sometimes, we may use your data when it is in the interest of another company, such as another ZPG brand, or the wider public good.

Who might we share your data with?

We share your data with third parties to provide our services. For example, we may share data with the partners whose products you have selected.

We also share data with third parties whose services we use to run our business. For example, we pay for a third party to host our databases. Where we use third party services to run our business, our suppliers cannot use the personal data we share with them for their own purposes.

• RVU and ZPG Companies

We work with other RVU Group businesses to provide our services to you. When we do this, we act as a joint controller of your data with these other RVU businesses.

We work with other companies in the ZPG group to store your data securely and efficiently. Other ZPG companies may use your data to provide services that you ask for, like home management, and recommend other services based on your interests.

We may also share your data with third parties for following reasons:

• Product suppliers: to get quotes and help you get products.

We may share your data with product suppliers to help them (or others) arrange your quotes, and to help you to get products. To help them work out your quote and decide if their products are right for you, these suppliers may use data from other sources. Examples of these data sources include the electoral roll, county court judgments, the DVLA and credit reference agencies.

Where our suppliers use credit reference agencies to help us provide you with prices, the checks may be logged in your file but they do not harm your credit score. However, if you apply for a product, the searches they do may be recorded and could affect your credit score. The privacy notices of suppliers set out their use of your data, and you should read them before you apply for their products.

• Product suppliers: to help stop fraud.

To help prevent and detect fraud we:

- Monitor the details on your application
- Work with partners, suppliers, other industry companies and fraud prevention agencies to share and receive relevant information

You must answer all questions honestly, accurately, and to the best of your knowledge. Failure to do so may result in you not being offered a product, incurring additional fees and charges, being left with an invalid policy, or seeing any future insurance claim being affected. You may also be liable for any third party costs in the event of a claim.

• Product suppliers: to help create better products for you.

We may share data with product suppliers to help them carry out market research and create better products for you.

• Our service providers: to help us run our business.

We may share your data with the business partners we use to provide our services. This could include using your address to get data about your property and help you find better products. For example, if you use our energy comparison, we share your address with industry partners to obtain your meter number(s) and estimated future energy use. We may also ask our survey partners to contact you, so that we can find out how to make our products better.

• Advertising partners: to target our adverts to you and others.

We may share some of your data to our partners who use it to help us target our advertising to you and others. This means we try to show you adverts that we think are relevant to you and we try to stop showing you adverts that are not.

• Analytics suppliers: to help us improve our services.

We may share data about your visit with analytics suppliers who help us improve our services for you and our business. This data is usually shared in a way that does not directly identify you.

We may also share your personal data with third parties:

• If we buy or sell any business or assets

If we buy or sell any business or assets, we may disclose your data to the prospective seller or buyer of that business or those assets, and its advisers. If we (or most of our assets) are bought, data held by it about its users will be one of the transferred assets.

• For client businesses

If we collect data on behalf of our clients, we will share your data with them and you will be informed when we are doing this.

• To obtain advice

We may disclose your data to obtain advice from lawyers and other professionals.

• For audience measurement

We may share your data with companies who help us to learn about who is using our services, and how they are used.

• To comply with the law

We may pass your data on when required to do so by law or in response to a request from law enforcement or another regulatory authority. We may disclose your data to enforce our agreements with you or to protect our rights, property, or safety, or that of our users or others. This includes sharing data for security and fraud prevention purposes.

• In emergencies

If we believe someone is in danger, we reserve the right to share data to help protect them.

• Anonymous data

We create and share general data about our consumers - you cannot be singled out within this data.

How do we store your personal data?

We take the protection of your data very seriously.

We follow best practices to secure your data, and we only keep it when the law allows and it is needed for the purposes it was collected. The periods we keep it for vary based on the type of data and the services you have used. However, we normally keep it while you are a customer or for up to 6 years from use of our services (or 7 years where we act as a broker for insurance). If necessary, we may retain data longer where such data is required for the resolution of a dispute.

We may store or process your data outside of the United Kingdom, where local privacy laws do not provide as much protection. When we do that, we use approved data transfer safeguards and legal frameworks (for example, Standard Contractual Clauses) to help ensure that your data is protected. By sharing your data, you agree to this transfer, storage, or processing.

Sending data over the internet is not completely secure. We will do our best to protect your data but we cannot guarantee its security, and sharing data with us is done at your own risk.

How do we use cookies?

Cookies are small text files and are widely used when you visit websites.

They help us identify you from other users of our websites and apps (including when you use other websites). They help us make your use of our services as good as possible (for example, saving your login details). We also use cookies to help target our advertising on this and on other websites.

You can adjust the settings in your browser to stop the use of cookies but some of our services may not work if you do so. To learn more about the cookies we use and why we use them, please read our Cookie Policy.

Opting out of collection of data by third party advertisers

Our third party advertising providers may target you on our websites and apps or in other places. To make those ads more relevant and help measure their effectiveness, they may use cookies and similar tools. They record your use (like the pages you have visited) to try to work out what interests you. They use this data in the ways described in their own privacy notices.

Your data rights.

You have data rights which are granted to you under data protection law which you can exercise at any time. We manage all rights requests raised to us as the law requires. This means there may be legal reasons why we cannot complete all requests.

Right to withdraw consent: Where you have given us consent to use your data, you may withdraw this at any time. For instance, you can ask us to stop using your data for email marketing by using the opt-out link in any marketing email we send you, or use our cookie preference centre to reject non-essential cookies

Right to delete: You can ask us to delete the data we have about you. We must comply with this request, unless using your data is necessary:

- to exercise the right of freedom of expression and information;
- to comply with a legal, regulatory, or contractual obligation which requires the use or retention of your data under UK law; or
- to exercise or defend legal claims.

Right to update: Although we make efforts to keep it correct, based on the latest data available to us, you can ask us to amend data that is incorrect or is not complete.

Right to limit data use: In some situations, you can ask us to limit the use of your data.

Right to portability: You can ask to share your data with another party when we use it because you have given us consent or when your data is used for the performance of a contract, and sharing your data does not affect the rights of others.

Right to object: You can object to our use of your data, when we use it based on our legitimate interests or those of a third party. If this happens, we will not use your data, unless we can show legitimate reasons and an overriding interest for its use, or for the exercise or defence of legal claims.

Right of access: You may ask us to give you a copy of the data that we hold about you. We will give you a copy of your data if you request it, once we have checked your identity (ID checks will vary based on the data we hold about you).

Right to complain: You can file a complaint with the ICO (Information Commissioner's Office), the United Kingdom's data protection authority. However, we'd prefer it if you first contact us to try and let us try to solve your problem – you can find our contact details below.

We have one month to complete a rights request, which can be increased for certain reasons where the law allows. If you want to use one of your data rights, please email us at privacy support@rvu.co.uk or contact us using the address below.

Facebook pages

When you visit our Facebook page, Facebook gets the data you create as you engage with our content. For this data, Facebook Ireland and we act as joint controllers under these terms.

Third party comparison and switching tools.

Some of our tools are provided by third party suppliers. We do not retain any of your data as part of your switch through these third party comparison and switching tools.

You can find details of the third party suppliers used to provide these services here.

Contact us.

If you have questions about this privacy notice or the way in which we collect and use your data, you can contact us using the details below:

Email: privacy support@rvu.co.uk

Address: Privacy Team, RVU Services Ltd, The Cooperage, 5 Copper Row, London, SE1 2LH.

We hope that we will be able to resolve any questions or concerns you have. However, you may at any time raise your issue with the UK Information Commissioner.

Changes to this notice

This privacy notice was updated on 21 February 2024. We reserve the right to update this notice and will post any changes on this page, so please check back frequently.