



## QUOTE BEATER LIMITED PRIVACY POLICY

### Introduction

Welcome to QuoteBeaters's Privacy Policy. QuoteBeater respects your privacy and is committed to protecting your personal data. This privacy policy is designed to inform you as to how we look after your personal data when you visit our website and use our services, what data we collect, how we will use it and to inform you about your privacy rights and how the law protects you. All personal information that We may use will be collected, processed, and held in accordance with the provisions of the Data Protection Legislation.

QuoteBeater Ltd is a limited company registered in England and Wales under company number 12588303. Our registered address is at 19-21 Crawford Street, London W1H 1PJ. QuoteBeater Ltd is registered with the Information Commissioners Office as a Controller under registration number: **ZA769276**.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary at the end of this policy document to understand the meaning of some of the terms used in this privacy policy.

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# **1. Important information and who we are**

## **Purpose of this privacy policy**

This privacy policy aims to give you information on how QuoteBeater collects and processes your personal data through your use of this website, including any data you may provide through this website or in the course of using our services via telephone or email communications with us when you make an enquiry.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

## **Controller**

QuoteBeater Limited is the controller and responsible for your personal data. QuoteBeater is referred to in this policy as "QuoteBeater", "we", "us" or "our".

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

## **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: QuoteBeater Ltd

Email address: [info@quotebeater.com](mailto:info@quotebeater.com)

Postal address: 19-21 Crawford Street, London, W1H 1PJ

You have the right to make a complaint to us at any time and to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. Updates will be published on this website: it is your responsibility to check from time to time to make sure there have not been any changes which affect you.

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.

## **Third-party links**

This website 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 data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include anonymous data which is data we hold in a way that does not allow an individual to be identified from the data.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, occupation, marital status, title, date of birth and gender for yourself and any authorised driver
- **Contact Data** includes your postal address, email address and telephone numbers
- **Insurance Data** includes details of your vehicle, your use of the vehicle, and your driving history (including any claims or losses and driving or other convictions) for yourself and any authorised driver
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses
- **Usage Data** includes information about how you use our website, products and services
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We may collect personal data falling with the **Special Categories of Personal Data** about you. This may include information about your health, medical history and any criminal convictions and offences relating to driving or use of a motor vehicle which we need in connection with answering your enquiry about motor insurance. We do not collect any other special categories of personal data about you (including details of your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or genetic and biometric data).

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that 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 answer your enquiry about the availability of insurance). In this case, we may not be able to provide you with a service but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, [and] Contact [and] Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - create an account on our website;
  - fill in the forms we ask you to complete; request marketing to be sent to you;
  - complete a survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We may verify personal data about you from our partners and from public sources as listed below:

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- search information providers [such as [NAME] based [inside **OR** outside] the EU].
- Identity, Insurance and Contact Data from publicly available sources such as the Driver and Vehicle Licensing Agency, Companies House and the Electoral Register based inside the EU

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To enable us to provide you with details of appropriate insurance brokers and estimates of premiums.
- 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.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will request your consent to pass your data over to our partners to enable them to provide you with insurance quotations.

If you have visited our site and have selected to obtain quotes from us by providing us with your personal data, we may contact you by telephone, email or SMS to discuss your quotes and the cover options available to you.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. For more information about the lawful basis for processing please see the explanation in the glossary at the end of this policy. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. 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 in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To provide you with Our services and to notify our Partners of your possible interest in an insurance policy they offer	(a) Identity (b) Contact (c) Insurance	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow

the effectiveness of the advertising we serve to you	(c) Profile (d) Usage (e) Marketing and Communications (f) Technical	our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences and for market research purposes	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Insurance (d) Technical (e) Usage (f) Profile (g) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to develop our products/services and grow our business)
To monitor against fraud detection and to help in fraud prevention	(a) Identity (b) Contact (c) Insurance (d) Technical (e) Usage	(a) Necessary for our legitimate interests (to protect ourselves and insurance businesses against fraud) (b) Legal obligation
to prevent or detect crime	(f) Identity (g) Contact (h) Insurance (i) Technical Usage	(a) Necessary for our legitimate interests (to protect ourselves and insurance businesses against crime) (b) Legal obligation
To provide you with insurance estimates around the renewal date	(a) Identity (b) Contact (c) Insurance	Necessary for our legitimate interests

## Marketing

We will provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## Promotional offers from us

We may use your Identity, Contact, Insurance, Technical, Usage and Profile Data to contact you by email, SMS or telephone to remind you that your insurance policy is due for renewal and to enable you to obtain further quotes from our Partners. If you would prefer not to be contacted for this purpose, then please contact us at [info@quotebeater.com](mailto:info@quotebeater.com).

### **Third-party marketing**

We will get your express consent before we share your personal data with any third party for marketing purposes. By providing your data and completing the forms on our website, we will assume that you consent to your data being passed to our Partners to enable them to contact you to discuss your insurance requirements.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by logging into the website and amending your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

### **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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- Our Partners – these will include the insurance providers that may choose to offer you an insurance quotation or policy of insurance
  - External Third Parties as set out in the Glossary below.
  - Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
  - In order to prevent and detect fraud we may share information about you with our group of companies or passed to fraud prevention agencies or law enforcement agencies.
6. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service 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. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We protect any data you have given us by providing you with a Login ID and password for your Account.

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

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: (see section Your legal rights below for further information).

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are explained more fully below (see “Your Legal Rights”).

### **No fee usually required**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This may include your full name, address and any photographic forms of identification. 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 to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We aim to respond to all legitimate requests within one month. Occasionally it could take us 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.

## **GLOSSARY**

### **Data Protection Legislation**

Data Protection Act 2018 and EU Regulation 2016/679 General Data Protection Regulation (“GDPR”) and your rights under the GDPR, or any legislation superseding or replacing that legislation.

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best possible service and the best and most secure experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## **EXTERNAL THIRD PARTIES**

- Service providers acting as processors based the EEA who provide IT and system administration services
- Professional advisers acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based in the EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## **YOUR LEGAL RIGHTS**

**You have the right to:**

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.

**Request correction** of the personal data that we hold about you. 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 data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that 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.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. 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 processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy
- where our use of the data is unlawful but you do not want us to erase it

- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on your consent to process your personal data. However, 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 or services to you. We will advise you if this is the case at the time you withdraw your consent.

This Privacy Policy was last updated on 30/06/2020