

Setoo Limited - Privacy Notice

Summary

Setoo Limited is committed to protecting your personal data and respecting your privacy. We want to maintain the trust and confidence of each of our customers.

This Privacy Notice gives you detailed information on when and why we collect your personal data, what personal data we collect, how we use it, and how we keep it secure. It also sets out some information about your rights and how you can complain, either to us or to the Information Commissioner's Office.

1. Who are we and how can you contact us?

1.1 Setoo Limited ("**Setoo**") is a private limited company incorporated in England and Wales (Company number 11187028). We are registered with the Information Commissioner's Office as a data controller in the United Kingdom¹.

Any questions regarding this Privacy Notice, our privacy practices, or any information we hold about you can be sent to us by:

- email: Dataprivacy@setoo.com; or
- telephone: + (44) 7340822602.

2. When do we collect information about you?

2.1 Some of the information we collect about you can be used to identify you. This type of information is defined as "Personal Data" under the UK Data Protection Act 1998 and, from 25 May 2018, the EU General Data Protection Regulation (EU) 2016/679 ("**GDPR**") as amended or replaced by legislation applicable in the UK ("**Data Protection Laws**"). In this Privacy Notice we use the words "**Personal Information**" to talk about your Personal Data.

2.2 We collect your Personal Information:

- (a) when you email, call us or write to us or provide us with information in any other way, including by interacting with us via social media such as Facebook, Twitter, Pinterest, YouTube, Google+ or Disqus;
- (b) when you visit, or make enquiries, register, send any messages and/or purchase products from us through the Setoo Website ("**Website**");
- (c) when you visit our Website and cookies are placed on your computer; and
- (d) when you provide information to us in connection with any provision of any goods or services to you, though whatever means.

3. What types of Personal Information do we collect and process?

3.1 We process the following kinds of Personal Information if you provide it to us:

- (a) Information about you, including your name, title, postal address, telephone number and email address (including sensitive/special category personal data where relevant and where we have your permission).
- (b) Information about you which we need to collect in order to assess the risk to be insured and provide a quote.
- (c) Information you provide as part of purchasing a policy (or any other service) from us.
- (d) Information you provide to us during communications you have with us and with our staff, whether by email, post, telephone, in person or through our Website, for example comments or queries or other information concerning the products and services we provide.
- (e) Financial information if relevant to the services we provide including if applicable, payment details.
- (f) Credit and anti-fraud data including credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you.
- (g) Information about your use of our Website and any other means of communication you use to contact us.

4. **Why do we collect your Personal Information, how do we use it, and what are our lawful grounds for collection and use?**

4.1 We collect and use your Personal Information for the following purposes:

- (a) To provide our services in accordance with our contractual obligations (and/or in anticipation of them) or where it is in our legitimate interest to do so in order to provide insurance services, including:
 - (i) to provide quotes, to set you up as a client and to process premiums; and
 - (ii) to process and to manage claims.
- (b) To communicate with you via email and to answer your questions and enquiries, in accordance with our legitimate interest to provide insurance services.
- (c) To update our records and for audit purposes, in accordance with our legitimate interest to provide insurance services and other services.
- (d) To prevent or detect fraud, in accordance with our legitimate interest to provide insurance services and other services.
- (e) Where legally required or where it is in our legitimate interests to provide insurance services, and also to comply with requests from law enforcement and regulatory authorities.

4.2 If you do not provide your Personal Information to us, we may be unable to provide you with our services.

5. **Profiling**

5.1 When calculating insurance premiums, we may compare your Personal Information against industry averages. Your Personal Information may also be used to create the industry averages going forward. This is known as profiling and is used to ensure premiums reflect risk.

5.2 Profiling may also be used to assess information you provide to understand fraud patterns.

6. **How do we share your Personal Information?**

6.1 For the purposes specified above, the Personal Information that you provide to us (including any sensitive personal data as appropriate and permitted by you) may be shared with:

- (a) our employees;
- (b) insurers, reinsurers and claims investigators;
- (c) credit or checking agencies;
- (d) our service providers
- (e) organisations such as the Prudential Regulation Authority, the Financial Conduct Authority and other regulatory authorities where we are required to do so by law;
- (f) prospective buyers in the event Setoo wishes to sell all or part of its business; and
- (g) other companies within the Setoo group of companies, for the purposes of (i) developing our services and enhancing them; (ii) reporting, management control, audit and accounting purposes and (iii) for corporate governance purposes.

7. **Where do we store your Personal information?**

7.1 We store your Personal Information on our servers, which are managed by us², and are located within the EEA.

8. **How long do we retain your Personal Information?**

8.1 We will keep your Personal Information only for so long as is necessary and for the purpose for which it was originally collected. In particular, we will keep your Personal Information for so long as there is any possibility that either you or we may wish to bring a legal claim under a policy, or where we are required to keep your Personal Information due to legal or regulatory reasons.

8.2 Depending on the record types and our relationship with you, retention periods range from 3 months to seven years, or for the period during which you request our services.

8.3 If you would like more detailed information about our retention policy, please email us at Dataprivacy@setoo.com.

9. **How do we protect your data?**

9.1 We aim to keep your Personal Information secure. In order to prevent unauthorised access or disclosure, we use appropriate physical, technical and organisational measures to keep the Personal Information we collect secure. Our service providers are required to do the same.

9.2 Unfortunately, transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information once we receive it, we cannot guarantee the security of your Personal Information transmitted to our Website; any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features to try to prevent unauthorised access or loss in accordance with Data Protection Laws.

9.3 We may need to transfer your data to Setoo Group, affiliates or sub-contractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance

with the relevant legislation. If you would like further details of how your personal data would be protected if transferred outside the EEA, please email us at Dataprivacy@setoo.com.

10. **Your rights**

10.1 You have a right to access your Personal Information to check that the information we hold about you is accurate and that it is being processed lawfully, and to request that it is corrected if you think it is inaccurate (see "**How you can access and update your Personal Information**" below).

10.2 You have the following rights:

- (a) to ask us to restrict the processing of your data (meaning that we could store it but not use it);
- (b) to object to how we use your data; and
- (c) to request that we delete your data.

Our response will depend on the circumstances and our legal obligations, including our obligations under Data Protection Laws.

10.3 You also have the right to ask us to "port" (transfer in an electronic format) personal data to another service provider if it is stored electronically, we received it from you, and if we are processing it on the grounds of your consent or for the performance of a contract.

10.4 For more information about your rights please see: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/> .

11. **How can you access and update your Personal Information?**

11.1 The accuracy of your Personal Information is important to us. You have the right to get information held about you by us corrected or removed if you think it is inaccurate.

11.2 If you have any concerns about the accuracy of your Personal Information, or if you would like us to remove the Personal Information we hold about you, please let us know using the below contact details.

11.3 You can request full details of Personal Information we hold about you, including a copy of it by contacting Dataprivacy@setoo.com. Please include a description of the information you would like to see, together with proof of your identity (a copy of your driving licence or passport and a recent utility bill). Please confirm in your email to us that you consent to us using your identity documents in order to check your identity, since in some cases it is possible that identity documents could reveal racial or ethnic origin or religion. We will delete your identification information after we have completed responding to your request and you have confirmed that you are satisfied with our answers.

12. **Complaints to the ICO**

12.1 If you are unhappy with us, our service, or with the way that we treat your Personal Information please contact us and we will work with you to resolve your issue.

12.2 You also have the right to contact the UK data protection authority, the Information Commissioner's Office ("**ICO**"). You can contact the ICO through its website: <https://ico.org.uk/global/contact-us/>. You can also call the ICO helpline from the UK on 0303 123 1113, or +44 1625 545 700 if calling from outside of the UK.

13. **Changes to this Privacy Notice**

13.1 Any changes we may make to our Privacy Notice in the future will be posted on our Website.