

PRIVACY POLICY – CLEMENTCOVER.COM LTD

1 Who we are and our approach to privacy

In this Privacy Policy, when we say ‘ClementCover’, ‘we’, ‘us’ or ‘our’, we mean ClementCover.com Limited, an insurance intermediary providing short-term and learner car insurance. We are a subsidiary of Ormiston Holdco Ltd and part of the Abacai Group (“The Group”).

The security and privacy of your personal information is very important to us. We want to assure you it will be properly managed and protected while in our hands. This Privacy Policy explains how, why, and when we use your personal information.

We are a data controller. This means we decide the purpose for which we use your personal information and how it is used. We have partnerships with a number of insurers and other introducers.

When you take out an insurance policy, a third-party insurer or ‘underwriter’ will also be a data controller.

When a third party is a data controller, we strongly recommend you review their privacy policy so you can understand how they will collect, store, use, and share your information.

We have appointed a Data Protection Officer who is responsible for the way we handle personal data. If you wish to know more or get in touch, you can do so by using the details in the “How to contact us about your requests or concerns” section below.

Temporary & Learner driver car insurance underwritten by ClementCover

ClementCover Temporary & Learner driver car insurance policies offer a flexible way to insure a vehicle for the exact amount of time you require. All policies are underwritten by ClementCover Insurance Limited (“ClementCover”).

ClementCover and its partners are both independent data controllers of the personal information collected for ClementCover Temporary & Learner driver car insurance.

This Privacy Policy explains how, why, and when ClementCover uses your personal information. A link to ClementCover’s privacy policy is also provided below. We encourage you to review both documents so that you can understand how, why, and when your personal information will be used.

For more information on how ClementCover will handle your personal data, please refer to ClementCover’s privacy policy.

2 What personal information do we collect and from where?

To provide you with our services, we collect, process, and hold only the personal data we need.

What information we collect about you will depend on the service involved and your personal circumstances, but includes:

- Basic personal information including name, address, contact details, and date of birth
- Information about your work or profession
- Your nationality
- Details of the products you hold with us and how you use them
- Financial information such as credit/debit card details and details of payments you have made to us
- Information on claims you have made
- Personal information gathered when you’ve applied for a product, including if we declined an application
- Information about how you interact with us, our website, and our services (e.g., ClementCover Mobile apps)
- Medical information, criminal offences, and other such sensitive information*
- Accessibility details if we need to make reasonable adjustments to help
- Government identifiers such as driving licence number, passport numbers
- Machine identifiers including your IP address
- Information about others regarding registered car ownership
- Information on the vehicle you are seeking to insure, some of which we’ll collect from external databases

This could include highly sensitive information also known as ‘special category’ personal data or criminal-offence information. We always minimise the use of such data. We’ll only use your more sensitive types of data when absolutely necessary.

Our website may include links to and from the websites of our partner networks, advertisers, and affiliates, or to social-media platforms. If you follow a link to any of these websites, please note they have their own privacy policies, and we do not accept any responsibility or liability for them. You should check how an organisation processes data before you submit any personal data to its website.

We collect information about:

- Previous, current, and prospective customers/policyholders
- Previous, current, and prospective parties covered under an insurance policy we arrange
- People authorised to speak to us on behalf of a customer or policyholder
- Users of our websites

If you provide personal information to us about other individuals, you should:

- Make sure you only share an individual’s personal information with us if you have their permission to do so
- Share this Privacy Policy with all individuals whose information you give us

We may obtain personal information in various ways:

- From you or someone connected to you
- Companies and organisations that introduce you to us
- Comparison websites
- From third-party databases used by the insurance industry (e.g., DVLA, Motor Insurers’ Bureau, Claims Underwriting Exchange)
- Credit-reference agencies
- Government bodies and agencies
- Law-enforcement agencies
- Fraud-prevention agencies
- Insurers and insurance underwriters (claims information)
- The electoral roll and other sources of publicly available information
- Our service providers
- Market-research providers
- Organisations providing data services to support us in managing our relationship with you and operating our business
- From other companies in the Abacai Group
- Social media (if you have made information publicly available)

If someone acting on your behalf gives us information, we’ll always record who gave it and what it said.

Our product and application contains public-sector information licensed under the Open Government Licence v3.0. For further information about the full terms of the Open Government Licence, please refer to URL:

<http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

3 Why do we collect personal information and how is it used?

We collect and use your information so we can arrange and administer your general insurance products and to operate our business. We only collect personal information that is necessary. We’ll only use that information when it is appropriate to do so.

UK data protection law requires that we have a reason to process your personal information. The most likely reasons for us to collect and use personal information are as follows:

Providing services that relate to a quote and/or insurance policy as part of a contractual relationship, including:

- Applying for and arranging insurance
- Referring to relevant databases to verify information provided
- Evaluating your application and ability to pay for your policy by instalments. This may involve sharing your personal information with credit-reference agencies. (See section “our use of credit reference agencies” for more detail.)

- The processing is a requirement that contributes to the wider public benefit resulting from the UK insurance industry.

We'll always minimize the use of this type of information.

4 Who We Share Your Personal Information With and Why

We take the privacy and security of personal data very seriously. We'll only ever share your personal data in ways consistent with UK data protection law. To give you peace of mind, ClementCover will never sell your data.

As part of operating our business, we may share your personal data with the following:

- Other brands or companies within the Abacai Group of companies (see the About Us section of our website for more information).
- Other insurers, partners, agents, or carefully selected third parties – this is usually when we use a third party to fulfill a service on your behalf (e.g., breakdown cover) or when a third party provides us with a service (e.g., professional advisers such as legal firms).
- Third parties that assist us in identifying and maintaining accurate information, detecting financial crime, preventing fraud, updating us on UK sanctions, or helping with investigations in cases of suspected fraud.
- Companies we partner with to provide you with insurance (e.g., introducers, insurance underwriters). You will be notified of who your insurer is both when you take out a policy and in your policy documents. We strongly recommend you also review your underwriter's privacy policy so you understand how they will collect, store, and use your information.
- We share information with credit reference agencies to assess your credit history. You can find more information on this in our section on the use of credit reference agencies.
- Statutory, regulatory, supervisory, or otherwise authorized public bodies to provide necessary information (such as the Financial Conduct Authority and the Information Commissioner's Office).
- Organizations to which we are legally required to disclose your personal information under applicable law (e.g., a UK police force or court).
- Insurance industry bodies such as the Motor Insurers' Bureau (MIB) and the Association of British Insurers (ABI).
- Third parties with whom you have given us permission to share your information, and it is reasonable for us to believe they are acting on your behalf or when you have agreed to benefit from an offer of service they fulfill (e.g., promotions associated with a purchase).
- We may pass information to third parties to fulfill marketing communications. We'll only do this if we have appropriate permission to do so. More information on this is available in our section on Marketing.
- Another company, where part or all of our business is being sold to them. To ensure cover continues uninterrupted, and as part of any potential sale, we may share personal information with the purchasing party. Any prospective purchaser would be under a strict duty of confidentiality that covers all personal information we share with them.
- Transfer of your information after the sale of your policy to another insurer. If this happens, we would specifically notify you of this. You will be able to exercise your right to object (see the Your Information Rights section for more details on this right).
- Piloting improved systems and services. Third parties may assist with this.

5 Will We Transfer Your Personal Information Overseas?

UK data law includes standards of data protection designed to keep your personal information safe.

We always aim to keep your personal information within the UK. If we do need to transfer, store, or use personal information outside the UK, we will either confirm that the location where your information is being processed is one that the UK Government has deemed equivalent to the UK's own standards (known as 'adequacy'), or we will implement additional protections to ensure it remains suitably secure and compliant with UK law.

This means your information should maintain a similar level of protection at all times.

Please contact us if you want further information on the countries to which we may transfer personal data and the specific mechanisms we use when transferring your personal data outside the UK.

6 How Long Will We Keep Your Personal Information For?

We only retain your personal information for as long as is necessary, as outlined in this Privacy Policy, and to fulfill our legal, regulatory, and contractual obligations.

At ClementCover, we have a Data Retention Policy in place that specifies how long different types of personal information should be retained. We regularly review this policy to ensure it aligns with current legal and regulatory requirements.

It is important for you to know that retention periods may vary depending on the specific circumstances of an individual case. However, in general, our retention periods for customer-related documents are as follows:

Information type	Retention period
Quotation only (no insurance policy purchased)	3 years
Purchased policy Information	7 years
Information about claims	7 years (longer in exceptional circumstances)
Customer account Information	1 year (after last consent was obtained)

7 Marketing (Communications Promoting Products and Services)

We, along with our trusted partners (including companies in the Abacai Group), may provide you with marketing offers for products and services. When we do so, we'll always give you the opportunity to opt out of direct marketing when you request an online quote, purchase a product online, or receive any email, text, or other direct marketing communication.

In addition, you can always ask us to stop contacting you about products and services directly. You can do this:

- By getting in touch through the channels identified in your product documents, or
- By using our contact details in the "How to Contact Us About Your Requests or Concerns" section of this Privacy Policy.

Although opting out will mean we stop all promotional communications, we will, of course, continue to send you service-related communications when necessary.

8 When Do We Use Your Personal Information to Make Automated Decisions About You?

At ClementCover, we use computers to make automated decisions about you, meaning that some decisions are not made by our employees. This is known as 'automated decision-making.'

When we assess your insurance application, we'll use an automated decision to apply our pricing and business-acceptance rules. This will determine whether we can provide a quotation and, if so, at what price. We'll use the information you provide about yourself and any other relevant individuals to make this decision.

As part of our assessment, we'll use information sourced from third-party companies, such as credit reference agencies. This assessment will involve driving-license checks and the review of relevant information, including verification of residence at the address provided, historic payment behavior on financial products, prior insolvency, and any relevant county court judgments. For more information, please see the section in this notice on Our Use of Credit Reference Agencies.

You have the right not to be subjected to automated decision-making without human intervention. However, you should be aware that some of the automated decisions we make are necessary to provide you with an insurance quotation. Objecting to their use may result in us being unable to offer you a policy. For more information on your right to human intervention, please see the section on Your Information Rights.

- Ongoing Management of Your Policy This includes amendments, claims, complaints, and notifying you of changes to your policy.
- Providing you with the services we have committed to in your policy documents, and allowing you to participate in interactive features of our services/websites. This may include transferring your information to third parties if necessary to provide a service or product feature.

Making Automated Decisions

When we assess an application, we use computer systems to make what are known as ‘automated decisions.’ You can find more information on this below in the section “When do we use your personal information to make automated decisions about you?” We need to use your personal information to assess your application, give you a quote, and offer you insurance. Without it, we’ll be unable to provide you with cover.

If Our Business Interests Mean It Is Reasonable and Justifiable for Us to Do So (Known as a Legitimate Interest), Including:

- Collecting information about you from databases as described in this notice and verifying information you provide against them.
- Strictly necessary website cookies, such as those that allow you to navigate and use essential website features, or for website maintenance and improvement. More information can be found in our Cookie Policy.
- Giving you a quote.
- Sharing information with other firms, industry bodies, and public organizations necessary to the conduct of our business.
- Recovering payments due to us.
- Data analysis to support, review, and improve our products and services.
- For the development of our business operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes.
- Audit and quality control to improve our customer service, training, and to run our business effectively. This includes call recording or monitoring, which may involve the use of voice analytics.

If We Have Your Permission to Do So, For Example:

- To give you information about products or services we feel may interest you (see our section on Marketing for more information).
- Where personal information is supplied by an individual who holds no contractual relationship with us but gives us permission to collect, store, and use their personal data (e.g., a learner driver’s parent or guardian).
- The collection, storage, and use of children’s personal information if this is necessary for the work being done (e.g., for learner drivers under the age of 18).
- If you have given your consent to our use of certain types of optional website cookies, such as those that personalize your repeat visits to our websites or allow third parties to conduct web analytics. More information can be found in our Cookie Policy.

If There Is a Legal Requirement to Share Personal Information:

- To assist with preventing, detecting, or investigating criminal offenses (e.g., fraud, money laundering, or organized crime). This includes sharing information in line with a legitimate request from a UK law enforcement agency.

Our Approach to Using Particularly Sensitive Types of Personal Information This includes criminal offense and special category information:

- When we collect, store, and use certain types of sensitive information, such as special category (e.g., health or medical records) or criminal offense data, data protection law includes additional safeguards.
- When we use personal information that relates to a criminal offense, we’ll usually do so for an insurance purpose.
- Similarly, if we have cause to use your special category information, we’ll normally do so with an extra justification. This will usually be when:
The processing is necessary to establish, exercise, or defend legal claims.

9 Our Use of Credit Reference Agencies

To assess applications and amendments, we conduct checks with credit reference agencies. We'll share the personal information you've provided with them so they can supply us with relevant information about you in relation to your application. This process is commonly referred to as a 'credit check.'

At ClementCover, we only perform a soft credit search, which may be recorded on your personal credit report. This creates a transparent record of which companies have viewed your credit history. Importantly, this type of search does not impact your ability to apply for credit. You can obtain a copy of your credit report at any time from a credit reference agency.

Please note: Not every soft credit search will result in a visible 'footprint' being left on your report.

For further information about how credit reference agencies use and share personal information, visit: <https://www.experian.co.uk/legal/crain/>

10 Your Information Rights

You have several rights regarding your personal information. We aim to make it as easy as possible for you to understand what these rights are:

Right to access	Right to rectify*	Right to erase*
You have the right to request a copy of the information we hold about you. This is usually free of charge and is called a data subject access request.	If you believe that any personal information held about you is incorrect or incomplete, you have the right to ask us to correct it.	In certain situations, you have the right to ask us to delete personal information we hold about you.
Right to restrict*	Right to object*	Right to data portability
You have the right to restrict us from processing your personal information any further or from deleting it.	You have the right to ask us to stop processing your personal information – for example, when we're using it for direct marketing or if you believe our processing of your information is causing you harm.	In limited circumstances, you have the right to request us to transmit your data directly to another organisation. We review all such requests on a case-by-case basis to see if they are feasible.
Right to human intervention	Right to withdraw consent	Right to complain
You have the right to request that a fully automated decision that used your personal information is reviewed by a person employed by Dayinsure.	You have the right to withdraw your consent to Dayinsure processing your information. Please note this can result in your policy being cancelled. Withdrawing your consent does not affect any use we have made of the information before this date.	You have a right to complain to the Information Commissioner's Office (ICO) if you feel there is a problem with the way Dayinsure is handling your data. The ICO will usually ask you to try to resolve your concerns with us directly before you refer your complaint to them.

Whether or not we fulfill a rights request depends on balancing your request against other factors, such as legal and regulatory requirements, the purpose of the contract between you and us, or if there is a compelling legitimate reason not to comply. However, if we are unable to meet your request in part or in full, we will always inform you of our decision and the reasons for it.

If you wish to make a data rights request, please email support@clementcover.com. We will acknowledge your request and prepare a response within one month.

For more information on the ICO's approach to complaints, visit www.ico.org.uk/concerns. Filing a complaint does not affect your other legal rights or remedies.

11 How to Contact Us About Your Requests or Concerns

If you wish to exercise an information right or have a complaint about how we gather, store, or use your information, you can contact us:

By post

clementcover . Com Ltd
Mara House
Nantwich Road
Tarporley
CW6 9UY

ICO -registered Data Protection Officer
Alexander Peters

Email – support@clementcover.com

***Important information**

For our joint protection, telephone calls may be recorded and/or monitored and will be kept for at least five years. Calls to 0800 numbers from UK landlines and mobiles are free. Calls to 03-prefixed numbers are charged at national call rates (charges may vary depending on your network provider) and are usually included in inclusive minute plans for landlines and mobiles.

11 How to Contact Us About Your Requests or Concerns

We may update this Privacy Policy occasionally to reflect significant changes in how we collect, store, or use personal information. Updates are typically in response to changes in data protection laws or their application.

You should visit our website regularly to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on 19/07/2023.