## **PRIVACY**

# How your personal information is used by Homesure

#### **Last updated March 2018**

Your information will be held by Homesure Support Ltd.

#### How we use your personal information

This privacy notice is to let you know how we look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

## **Our Privacy Promise**

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to review your marketing choices at any time.

# Data Protection law will change on 25 May 2018

This notice sets out most of your rights under the new laws. We'll update it again between now and 25 May 2018 when changes come into effect.

#### Who we are

Homesure Support is an Independent Limted company based in Sussex.

If you have any questions, or want more details about how we use your personal information, you can ask us using our secure online <u>contact form</u>.

### How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside of Homesure Support Ltd. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

Our reasons	Our legitimate interests
<ul> <li>Your consent.</li> <li>Fulfilling agreements.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul> <li>Keeping our records up to date, working out which of our services may interest you and telling you about them.</li> <li>Developing products and services, and what we charge for them.</li> <li>Defining types of customers for new products or services.</li> <li>Seeking your consent when we need it to contact you.</li> <li>Being efficient about how we fulfil our legal duties.</li> </ul>
<ul> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul> <li>Developing services, and what we charge for them.</li> <li>Defining types of customers for new products or services.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> <li>Complying with laws that apply to us.</li> </ul>
<ul><li>Fulfilling contracts.</li><li>Our legitimate interests.</li><li>Our legal duty.</li></ul>	<ul> <li>Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect.</li> <li>Complying with laws that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul><li>Our legitimate interests.</li><li>Our legal duty.</li><li>Fulfilling agreements.</li></ul>	<ul> <li>Complying with laws that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
	<ul> <li>Your consent.</li> <li>Fulfilling agreements.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul> <ul> <li>Fulfilling contracts.</li> <li>Our legal duty.</li> </ul> <ul> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul> <ul> <li>Fulfilling contracts.</li> <li>Our legal duty.</li> </ul> <ul> <li>Fulfilling contracts.</li> <li>Our legal duty.</li> </ul> <ul> <li>Fulfilling contracts.</li> <li>Our legal duty.</li> </ul> <ul> <li>Our legal duty.</li> </ul>

# **Groups of Personal Information**

We use many different kinds of personal information, and group them together like this.

Contact	Where you live and how to contact you.
Transactional	Details about payments to and from your
	accounts with us, and repairs you have.
Agreements	Details about the products or services we provide
	to you.
Locational	Data we get about where you live from data
	marketing companies, where you have opted in.
Technical	Details on the appliances and technology you use.
Communications	What we learn about you from letters, emails, and
	conversations between us.
Open Data and Public Records	Details about you that are in public records such
	as the Electoral Register, and information about
	you that is openly available on the internet.
Usage Data	Other data about feedback of our services.
Documentary Data	Details about you that are stored in documents in
	different formats, or copies of them. This could
	include things like death certificates and certified
	power of attorney documents.
Consents	Any permissions, consents, or preferences that
	you give us. This includes things like how you
	want us to contact you, whether you get paper
	statements, or prefer large-print formats.

# Where we collect personal information from

We may collect personal information about you from other third party companies and from these sources:

Data you give to us:

- When you apply for our services
- When you talk to us on the phone
- When you use our website
- In emails and letters
- In repairs or other documents
- In customer surveys
- If you take part in our competitions or promotions.

Data we collect when you use our services. This includes the amount, frequency, type, location, origin and recipients:

• Payment and transaction data.

Data from third parties we work with:

- Companies that introduce you to us
- Card associations, payment gateway solution companies

- Retailers
- Direct debit bureaus
- Public information sources such as Companies House
- Agents working on our behalf
- Market researchers
- Law enforcement agencies.

### Who we share your personal information with

- Agents who we use to help run your repairs, collect what you owe, and explore new ways of doing business
- Any party linked with your product or service
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Companies you ask us to share your data with.

We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you use a debit or credit card, we will share transaction details with companies which help us to provide this payment service.
- If you use direct debits, we will share your data with the Direct Debit scheme.
- If you are in need of a repair, information you give to us may be shared to third party appliance maintenance companies.

#### **Detecting fraud**

If we think there is a risk of fraud, we may cancel the agreement and stop any direct debits and card payments, and alert the authorities. .

# If you choose not to give personal information

We may need to collect personal information under the terms of an agreement we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to fulfil our agreement. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

#### Marketing

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We can only use your personal information to send you marketing letters if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing letters by contacting us at any time.

Whatever you choose, you'll still receive other important information such as changes to your existing products and services.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

### How long we keep your personal information

We will keep your personal information for as long as you are a customer of Homesure Support Ltd.

After you stop being a customer, we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

#### How to get a copy of your personal information

You can access your personal information we hold by writing to us at this address:

HOMESURE Queensbury House 106 Queens Road Brighton BN1 3XF

#### Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

# What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

#### How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

# How to complain

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

Please let us know if you are unhappy with how we have used your personal information. You can contact us using our <u>contact form</u>.

You also have the right to complain to the Information Commissioner's Office.

## Future formats for sharing data

The Data Privacy laws will change on 25 May 2018. From that date you will have the right to get your personal information from us in a format that can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations.