

PRIVACY POLICY – DAYINSURE.COM LTD

Introduction

Aviva 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 Aviva Insurance Limited (“Aviva”).

Dayinsure and Aviva are all data controllers of the personal information collected for Aviva Temporary & Learner driver car insurance.

This document provides details on how information about you, that you have provided to Dayinsure will be used and provides you with the link to the Aviva’s Privacy Policy so that you understand how they will use your personal information.

The security and privacy of your personal information is very important to us and we want to assure you that it will be properly managed and protected whilst in our hands.

Aviva Information

For more information on how Aviva will handle your personal data please refer to [Aviva’s Privacy Policy](#).

Dayinsure

By providing your personal data to us, you have agreed to the way we will process it as detailed below. If you have provided us with personal data about others, you have obtained permission from that individual to do so and understand that they also understand how we will use it.

We are unable to offer you any product or service that requires the processing of special category data as defined in all relevant UK data protection legislation including GDPR, Data Protection Act 2018 and PECR, unless you provide explicit consent for the collection and use of such data.

We use a combination of technical, organisational and physical security measures to protect your personal information in line with our obligations under the data protection law. Our employees receive regular training to help us comply with data protection law and safeguard your privacy.

Who are we?

Dayinsure.com Limited is a subsidiary of Ormiston Holdco Ltd, a company incorporated in Jersey No 130131. and is part of a group of limited liability companies who arrange and administer general insurance products.

We have partnerships with a number of insurers and other introducers.

Under data protection law, an organisation that decides how the personal information it collects and holds is used is called a ‘data controller’. We call this use of personal information ‘processing’.

If you are a Dayinsure.com Limited customer we will be the data controller of your personal information and when we say ‘Dayinsure’, ‘we’, ‘us’ or ‘our’, we mean Dayinsure.com Limited.

We use the following data processors to assist in your application for insurance, and for use of the Dayinsure platform:

- Adyen
- Paypal
- RAC
- Mulsanne
- Other Group Subsidiaries

At all times Dayinsure.com Limited will remain the data controller.

What data do we collect about you and hold?:

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

The data is collected from you, from external sources (both public and private) in order for us to provide you with our services. This data is then processed and stored.

Below is a list of the Personal Information we may collect and hold about you:

- Your name, address, contact details including telephone number and email address and your date of birth
- Information about your work or profession
- Your nationality
- Detail of the products you hold with us or previously held with us and how you use them

- Details of payments you have made to us
- Claims information you have made
- Personal information gathered when you've applied for a product, including where an application was declined
- Details of when you contact us and when we contact you and access certain services (e.g., Dayinsure Mobile apps)
- Medical information if its relevant to your policy or claim
- Accessibility details if we need to make reasonable adjustment to help
- Government identifiers such as driving licence number, passport numbers
- Machine identifiers including your IP address
- Information about others who will be or are detailed on your policy as the registered car owner
- Information on your car, some of which will be collected from external databases
- Information about how you interact with us, our website and our services
- Other information that you supply to us or that we obtain from our relationship with you. For example, Information relevant to an insurance claim you make or about your marketing preferences. This could include sensitive information (i.e., Claims history or criminal convictions or county court judgements), also known as Special Category Personal Data
- Credit/debit card details in order to complete your purchase

Where do we collect information from?

- **Information we collect directly from you**

Most of the information we hold about you comes directly from you. This includes information you give us when:

- You ask for a quote
- You purchase our products and services
- You verify and complete your profile
- You interact with us or make customer enquiries (we may record some calls for training and quality purposes)
- You register for information or other services
- You register a claim
- You respond to communications or surveys
- We require additional information from you for validation purposes
- You update your information (such as a change of address).
- You use technology such as cookies and your device.
- You've made public such as tweets or social media content too (e.g., when you interact with our social media profiles like @dayinsure on Twitter or you have left a rating on Trustpilot)

- **Information we gather from third parties**

We might collect or receive information from third parties too (both public and private) These include:

- Credit reference agencies
- Government bodies and agencies
- Law enforcement agencies
- Fraud prevention agencies
- Insurers
- The Electoral Roll and other sources of publicly available information
- Our service providers
- Companies and organisations that introduce you to us
- Comparison websites
- Market research providers
- Organisations providing data services to support us in managing our relationship with you and operating our business
- Claims

- **Information gathered from people acting on your behalf**

Sometimes, we may need to collect information from people acting on your behalf. This could be from a parent, guardian (NB: you will need to provide permission for this to happen) or someone who holds a Power of Attorney.

If someone acting on your behalf provides us with information, we'll record what's been provided and who gave it to us.

In the event you are providing information about another individual, we'll assume that you have told them that you are sharing their details and where they can find more information on how we may process their details.

How do we use your information?

We collect and use your information so we can arrange and administer your general insurance products and also operate our business. Examples of how we use your information include:

- To underwrite and calculate your insurance quotation
- To handle a claim under the policy for you or that someone else makes
- To administer your policy and deal with complaints
- To check your identity and confirm that it's you
- To manage your products and relationship with us
- To check your credit references (soft footprint only)
- To prevent and detect fraud and financial crime
- To analyse and research our products and services
- To enhance your experience of our products and services
- To provide relevant marketing about our products and services
- To meet our legal and regulatory obligations
- To training/test our systems and processes.

When we can use your information

We're able to use your information for the purposes outlined above, where one of the following applies:

- We use the information to carry out our obligations to you, as part of an agreement between you and Dayinsure
- We must use the information to comply with the law or in the public interest.
- We use the information to carry out our legitimate business interests.
- You have given us consent to use the information.
- We use your information to protect your vital interests (e.g., in very exceptional circumstances and when we believe it's in your best interests).

Checks to Credit Reference Agencies and Fraud and Other Financial Crime

• Credit Reference Agencies

When you request a quotation or an amendment to an existing policy from Dayinsure we may undertake some checks with a credit reference agency. Your personal information provided during the quotation process will be shared with them so that they will give us information about you.

These checks will provide us with:

- Publicly available information (e.g., electoral roll, county court judgments, bankruptcy orders or repossessions. Similar checks may be made when assessing claims
- The ability to verify your identity, prevent criminal activity and financial crime (including fraud and money laundering) and to carry our risk profiling which allows us to calculate your premium.

For further information about the credit reference agencies, we use and the ways they use and share Personal Information go to <https://www.experian.co.uk/legal/crain/> for more details.

Dayinsure only performs a soft credit search which may be recorded on your personal credit report so that there is a transparent record of which companies have been viewing your credit history, but this type of search will not affect your creditworthiness. You can get a copy of your credit report at any time from a Credit Referencing company.

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

• Fraud and Other Financial Crime

To meet our Fraud and Financial Crime stator and regulatory responsibilities, we use your Personal Information to detect and prevent fraud and other financial crime,

If you're making an application or submitting a claim, we may use profiling and other forms of automated processing to assess the probability that your application or claim may be fraudulent. This assessment may also involve the use of Sensitive Personal Information. (e.g., we may use your past motoring convictions information) To prevent and detect and investigate fraud, we:

- Check public registers (e.g., the electoral roll, county court judgements)

- Conduct online searches from websites, social media and other information sharing platforms.
- Use databases managed by credit reference agencies, insurance industry bodies, fraud detections agencies and other reputable organisations. This includes the Insurance Fraud Bureau.
- Share Personal Information and undertake searches with our Group members, other third parties, including other insurers, fraud prevention agencies, law enforcement agencies, public bodies and our regulators (which include FCA, MIB, ICO)

If you give us false or inaccurate information and we suspect fraud, we'll record this to prevent further fraud and money laundering and this may be shared between insurers.

How we store your personal data:

Dayinsure.com LTD use several data storage methods which include:

- Electronically on the Microsoft Azure environment
- On iCloud (for Word, Excel, Emails, PDF's)

Information held on the Microsoft Azure Environment is securely backed up and your data is encrypted to protect it from cyber-attacks and on-line hackers. Any manual records are stored in secure locked offices.

How may your information be shared:

To give you peace of mind Dayinsure will never sell your data. The information we collect will be passed to insurers to enable them to calculate a competitive insurance quotation to meet your requirements and/or handle a claim under the policy.

In order to obtain the most appropriate policy it may be necessary to pass your information to other insurance intermediaries who are authorised and regulated by the Financial Conduct Authority. Information provided by you may be put onto a register of claims and shared with other insurers to prevent fraud.

We may also share your data with other third parties in order to meet our legal or regulatory requirements. This includes statutory bodies and third parties who request information about you that they need to help prevent or detect crime or fraud.

We may also disclose your information to third party suppliers or service providers to conduct our business, for example, to help administer your policy, to help us manage and store data, provide data analytics, conduct market research and to communicate with you effectively. This may include any online or digital partners we work with, so we, or our online or digital partners on our behalf, can communicate with you through their platforms.

We may also share your information with other companies within the group that underwrites policies or provide claim handling administration or to prospective buyer or purchasers in the event Dayinsure is acquired by another business.

International Data Transfers

Sometimes we may need to share your personal information with companies located outside of the UK. If we have to do so our contracts with these organisations will require them to confirm that they will provide consistent and adequate protection which is equivalent to the UK's levels of protection for your personal data.

How long we keep your data for:

We will retain any information held electronically as outlined in our Data Retention policy which sets out the basic principles applied to the storage of data within Dayinsure.com LTD (a copy can be requested by contacting us). The aim of the policy is to ensure that data is kept only while it is required either for business processing or for legislative reasons. A summary of this data retention policy is below:

Data Status	Retention Period
Quotation Only (no insurance policy purchased)	3 Years
Policy Arranged	7 Years
Customer Account Information	1 Year (after last consent was obtained)

In all instances your personal data is processed by us by our staff in the UK. However, for the purposes of IT hosting and maintenance this information may be located on servers within the EEA.

Your information rights:

You have a number of rights when it comes to personal information. We want to make it as easy as possible for you to understand what these rights are:

Right to access You have the right to request a copy of the information we hold about you, free of charge. This is known as a 'Subject Access Request'	Right to rectify* If you believe that any information held is incorrect and/or incomplete you have the right to ask us to correct information about you.	Right to erase* In certain situations, you have the right to ask us to delete information that we hold about you.
Right to restrict* You have the right to restrict us from processing your information any further or deleting it.	Right to object* 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 feel that us processing your information is causing you distress and you'd like us to stop.	Right to data portability You have the right to request us to transmit your data directly to another organisation or to yourself which we will undertake if this is technically feasible.
Right to human intervention You have the right to request for a fully automated decision to be reviewed.	Right to withdraw consent You have the right to withdraw your consent to Dayinsure processing your information. By withdrawing your consent, it will not affect any use we have made of the information before this date.	Right to complain You have a right to complain to the Information Commissioners Office if you feel there is a problem with the way Dayinsure.com LTD is handling your data. Please contact: https://ico.org.uk/concerns/handling/

*We may not accept or comply with your 'Rights Request' as we have to balance your request against other factors such as legal and regulatory requirements, the purpose of a contract between us and you or if there is a compelling legitimate ground not to.

If you wish to make a subject access request, please email support@dayinsure.com with your request, we will acknowledge your request and prepare response within one month.

Marketing

We may, along with our trusted partners (Aviva, Mulsanne and our sister Group companies), provide you with updates and offers on services via marketing, but we will 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.

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements. You should regularly check this Privacy Policy for updates. If there will be any significant changes made to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our website.

Contact Details

If you need any further information or need to contact us please write, telephone or email us at:

Dayinsure. Com Ltd
Mara House
Nantwich Road
Tarpoley
CW6 9UY

ICO appointed Data Protection Officer –
Patrick O'Grady
E-Mail – support@dayinsure.com
Tel - 0333 005 0944*

*Important information

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