

# Pedalsure.

## Privacy Policy

How we collect, store and use  
the information we collect from you.

### Contact Us

 0800 888 6745

 [cservice@pedalsure.com](mailto:cservice@pedalsure.com)

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## **1. Your Acceptance of This Privacy Policy**

When you use our website, ask us to obtain a quotation for, arrange, or handle your insurance you confirm your agreement to this Privacy Policy and our Terms and Conditions which can be found on our website. For your own benefit you should read both documents carefully. If you are unsure about any aspect of this Privacy Policy or our Terms and Conditions, or have any questions regarding our relationship with you, please contact us.

## **2. Who We Are**

Pedalsure No3 Limited is a company registered in England (company no. 1345479). Our registered address is Suite 3, Dukes House, 4-6 High Street, Windsor, SL4 1LD. We are an Appointed Representative of Pro MGA Solutions Ltd which is authorised and regulated by the Financial Conduct Authority under reference 770419.

You may contact us by emailing: [cservice@pedalsure.com](mailto:cservice@pedalsure.com).

## **3. How We Collect Data**

When you get a quote for insurance from us or take out a policy we collect your personal data. By using our website we also use cookies and other tracking data to collect information from your computer or portable electronic devices.

### *What is personal data?*

Personal data is information relating to an identified or identifiable natural person. Examples include an individual's name, age, address, date of birth, their gender and contact details, including email address.

Personal data may contain information which is known as special categories of personal data. This may be information relating to an individual's health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to or sexual orientation.

Personal data may also contain data relating to criminal convictions and offences. For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

### *What are cookies and tracking data?*

A cookie is a small file of data that we store via your browser. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Cookies help us track where a sale has come from. They enable us to verify sales that have come through specific sources such as cash back websites or emails. We also use cookies to track the performance of our website, we can use the data we collect to see how useful the information we display is and help us understand what on our website could be improved.

The cookies on our website are all there to help your experience, whether it is to assist you to get your cashback from a third party, or to make sure you find the information you want on our website as quickly as possible.

In addition to cookies, our website uses other tracking technologies such as web beacons, pixels, and mobile identifiers. We use such tracking data to deliver relevant online advertising, including on websites and on social media.

## **4. How And Why We Use Your Personal Data**

### *A. To provide insurance services*

#### **How we use your personal data for this purpose**

Your personal information is required to generate the insurance quote and will be forwarded to the insurance provider and their agents for the presentation of your premium. When you purchase an insurance policy through us, we use your personal information to administer your policy, including for the purpose of contacting you from time to time about your policy (e.g. for billing or administrative purposes) and in the event of a claim.

Except as set out in this Privacy Policy, we will not disclose any of your information to other parties without your permission unless we are legally required to do so by, for example, a court order or for the purposes of prevention of fraud or other crime.

We may also use your data for our own research, which may include but is not limited to tracking any purchased policies or for the purpose of detecting and investigating potential fraud.

We will share your personal data within our firm, group of companies, business and with business partners. This is normal practice within the insurance industry where it is necessary to share information in order to place, quantify and underwrite risks, to assess overall risk exposure and to process claims. It is also necessary to determine the premium payable and to administer our business.

We also share personal data with authorised third parties, this is necessary where we are required to do so by law, where we need to administer our business or to quote for, source, place and administer your insurances.

We may undertake a credit check with credit reference agencies, fraud prevention agencies, and other public and privately available sources of information. These checks will include electoral roll and credit information. These insurance credit checks are registered as general insurance searches and may be viewed by other companies when you apply for credit or insurance. These searches won't harm your credit profile or adversely affect your credit profile.

Some examples of third parties we may share your data with include:

- Insurers
- Underwriters
- Premium finance providers
- Credit reference agencies
- Consumer and market research agencies
- Debt recovery agencies
- Claims handling companies
- Loss adjusters
- Insurance brokers
- Reinsurers
- Regulators

By continuing to use our website you confirm that you give us permission to store and process your data and that you have permission from all individuals named under the policy for their data to be used in this way.

#### **Why we use your personal data for this purpose**

We use your personal data in the ways described above for several reasons depending on how it is used. Such reasons include that we would be unable to provide insurance services to you unless we use the information in such a way, because we are required to do so by law, or otherwise because it is in our legitimate interests to improve the product and service we offer our customers or detect and reduce the likelihood of fraud occurring.

#### *B. For marketing and communication purposes*

##### **How we use your personal data for this purpose**

If you purchased a policy through us you will receive an email reminder from us when your renewal is due. You cannot opt out of receiving this email.

When you purchased a policy through us, created an account with us, or when you took advantage of a promotion or competition of ours, we asked you to indicate your marketing preferences. Where you opted-in to receive marketing communications from us or, alternatively, where you did not opt-out despite being given the opportunity to do so, you gave us permission to contact you through the channels specified about promotions and news about Pedalsure from time to time. At the end of your policy if you do not renew, we will only contact you if you have given us permission to by opting in on our website.

Where you consented to marketing from us, we may share your personal data, for example email address (in hashed non-identifiable form) with, for example, Facebook or Google in order to show you advertising on those platforms or for the purposes of creating audiences of users who may be similar to you. Alternatively, we may use this data to exclude you from seeing our advertising on those platforms.

You are free to change your marketing preferences at any time by contacting:  
cservice@pedalsure.com.

We use cookies and other tracking technologies such as web beacons, pixels, and mobile identifiers. We use such tracking data to deliver relevant online advertising, including on

websites and on social media. Such advertising includes retargeting where our adverts are displayed to users who have recently visited our website, and advertising to groups of users who may be similar to those who have recently visited our website or made a purchase on our website.

You may refuse or disable the use of cookies and tracking data by adjusting your preferences in the cookie consent banner displayed when you visit our website or by changing your internet browser settings. Each browser has a different procedure for doing this. Please note that a refusal to accept cookies may result in a loss of functionality of the website.

You may disable cookies and you can still obtain a quotation, but it will be necessary to call the office on 0800 888 6745 to complete your sale.

#### **Why we use your personal data for this purpose**

We use your personal data in this way because it is in our legitimate interests to provide you with the right information about our products and services at the right time, so that we may look at ways of extending our relationship that we have with you.

Where we use cookies and tracking data, or otherwise share hashed non-identifiable data with advertising platforms, for the purpose of own advertising, we use your personal data in such a way because it is in our legitimate interests to deliver relevant advertising to persons who may be interested in our products and services from time to time, or to exclude them from seeing our advertising on those platforms.

#### *C. For communication monitoring purposes*

#### **How we use your personal data for this purpose**

We may monitor or record your communications with us when contacting our customer care, complaints and other customer focused functions.

#### **Why we use your personal data for this purpose**

We use your personal data in this way for business purposes, such as for quality control and training, processing necessary for the entering into or the performance of a contract, to prevent unauthorised use of our telecommunication systems and websites, to ensure effective systems operation, to meet any legal obligation, in order to prevent or detect crime, and for the purposes of the legitimate interests of the data controller.

## 5. Retention of Your Personal Data

### *A. Control of your data*

Where we collect data directly from you, we are considered to be the controller of that data i.e. we are the data controller. Where we use third parties to process your data, these parties are known as processors of your personal data. Where there are other parties involved in underwriting or administering your insurance, they may also process your data in which circumstance we will be a joint data controller of your personal data.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation which processes personal data on behalf of the controller.

As a provider of insurance services, we will process the following categories of data:

- Personal data such as an individual's name, address, date of birth, gender, contact details and details of historic claims
- Special categories of personal data such as health and details on historic claims resulting in injury (physical and physiological)
- Data relating to criminal convictions and offences such as details of driving offences or insurance fraud

If you object to the collection, sharing and use of your personal data, we may be unable to provide you with our products and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

If you require more information about our insurance processes or further details on how we collect personal data and with whom we share data with, please contact our data privacy representative by e-mailing [philip.lochner@Pedalsure.com](mailto:philip.lochner@Pedalsure.com).



### *B. How long we retain your personal data for*

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Once the purpose for using your data has been fulfilled, we will securely delete that data or anonymise your information (so that we, or anyone else, can no longer tell that data relates to you) unless we are required to retain the data longer for legal, tax or accounting reasons. For example, we may keep some of your personal data for up to six (6) years following the date on which we last provided our products or services for tax purposes.

## **6. Your Rights**

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights or otherwise update your marketing preferences at any time by contacting us using the details set out in section 2 above.

Such rights include:

- The right to be informed about the personal data being processed;
- The right of access to your personal data;
- The right to object to the processing of your personal data;
- The right to restrict the processing of your personal data;
- The right to rectification of your personal data;
- The right to erasure of your personal data;
- The right to data portability (to receive an electronic copy of your personal data);
- Rights relating to automated decision-making including profiling.

Please note:

- The rights set out above do not apply in all circumstances.
- In some cases we may not be able to comply with your request (for example, where there is a conflict with our own obligations to comply with other legal or regulatory requirements).

However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

- In some circumstances exercising some of these rights (such as the right to erasure or the right to restrict processing) will mean we are unable to continue providing you with insurance and may therefore result in its cancellation. You will therefore lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled

As mandated by law we will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

## **7. The Data Protection Officer**

If you have any questions relating to data protection that you believe we will be able to answer, please contact our Data Protection Officer:

Data Protection Officer  
Pedalsure No 3 Limited  
Suite 3 Dukes House  
4-6 High Street  
Windsor  
SL4 1LD  
United Kingdom  
or (DPO Pedalsure) P Lochner - [info@Pedalsure.com](mailto:info@Pedalsure.com)

## **8. Complaints**

If you are not satisfied with our response or believe we are not processing your personal data in accordance with legal requirements, you can make a complaint to the Information Commissioner's Office (ICO) by visiting the following URL: <https://ico.org.uk/concerns/>, by live chat or by calling their helpline on 0303 123 1113.