**About this Privacy Policy**

WECOVERED is a trading name of QI Group LTD which is registered in England and Wales the company number 12607417 and has its registered office at The HQ Dell Road Rochdale OL12 6BZ. We are authorised and regulated by the Financial Conduct Authority (FCA) and our firm reference number is 930773. Information Commissioner’s Office ICO Date Protection Officer Reference Number ZA840919. We respect the privacy of visitors to our website and app. When we refer to, we, us, WECOVERED, or QI Group LTD we are referring to this company.

This policy applies to all users of our website and our app services.

**1 What this Privacy Policy applies to**

This policy applies to the information which we may hold about you. This includes:

* information you provide during any quote process, such as your name, your age, and your contact details.
* information you provided when you enter prize draws, competitions or provide reviews.

information which we may obtain about you from third parties (for example, because you have given third parties permission to share that information with us). For instance, this might be from our providers or partners if you decide to proceed to purchase a policy after obtaining a quote on our website or app.

* information we collect about how you use the website or app, such as traffic and usage data. We use cookies and similar technologies to collect this information as detailed further below.

**2 Our obligations**

We will comply with data protection law in the way we use and share your personal data. Among other things, this means that we will only use your personal data:

* fairly and lawfully,
* as set out in the legislation and this policy,
* to the extent necessary for these purposes.

We will take every reasonable precaution to safeguard the personal information that you supply.

If you have any queries relating to our use of your personal information, or any other related data protection questions, please contact us at info@wecovered.com

**3 Our services and the personal information we collect**

If you provide us with your information through this website or app, for instance by filling in one of the forms requesting us to compare insurance quotes, we shall use your information as set out in this Privacy Policy and in the notices we provide when you submit your information. By submitting your personal information, you consent to our use of the information as set out in this Privacy Policy and such notices. You will be able to withdraw that consent at any time by the methods described in this Privacy Policy. We may need to collect your special categories data to allow us to provide you with quotes, as set out below.

If you give us your personal information, we will use it to provide you with the quote information you request (including the annual renewal service - see section 4). If you request a quote through our website or app, we will forward the personal information you submit to providers or partners to enable us to obtain a quote for you. The providers or partners may use your personal information for their own purposes, as set out further below. We cannot provide a quote to you unless we are able to share your personal information in this way.

Please note that we can offer both online, app and offline insurance services depending upon the product you wish to receive a quote on.

Note that it is your responsibility to check and ensure that all information, content, material or data you provide on our website or app is correct, complete, accurate and not misleading and that you disclose all relevant facts.

We make sure that we have appropriate security measures to protect your information (see section 14 Security below).We will periodically review your personal information to ensure that we do not keep it for longer than is permitted by law (see section 9 below which details how long we keep your personal information for).

*Special Categories Data*

To provide you with a quote we may need to collect personal information which data protection legislation defines as special categories data, such as medical history or criminal convictions. We may also need to share this data with providers or partners to enable them to generate their quotes for you. We may process this data because it is in the substantial public interest to do so for the purposes of arranging and/or advising on contracts of insurance.

*Providing data about other people*

If you are providing us with another person’s information you should first ask them to read this Privacy Policy and our Terms and Conditions. By giving us information about another person you are confirming that they have given you consent to provide the information to us and that they understand how their details will be used.

**4 How we use your data and communications from us**

We will use your data in the following ways:

1. use of our services - we will use your personal data to provide you with the service you request. See Section 3 above in relation to our services.
2. for research, such as analysing market trends and gathering information on how you use our website or app you have viewed.
3. to process a transaction between you and a third party (where applicable).
4. to track sales, which may involve us sharing data with your providers or partners relating to the product(s) you have purchased. The providers or partners may also send us information they hold relating to the product(s) you have purchased for this purpose.
5. to communicate with you as follows:

**Quote Confirmation**

When you obtain (or request) a quote with us, or a confirmation of your quote (or confirmation of your quote request when using our offline insurance service) you can request email so that you have a record of it.

**Being kept up to date by us**

Where you tell us, you are happy to receive information from us we may send you communications which may include the following: -

* Further information about the services we offer
* New product launches
* Newsletters
* Any interesting competitions or promotions run by us
* Opportunities to participate in market research or provide reviews about wecovered.com

Depending on the contact preferences you select, we may communicate with you by email, SMS, post, and telephone.

**Annual renewal service**

As part of our services, we may also contact you by email and/or SMS around the anniversary of when you completed your quote in order to remind you to carry out a new quote for the forthcoming year. We believe that this is an important part of the service to help ensure you do not forget to renew your insurance. As part of this service we may also resubmit your quote details to give you an idea of what your quotes could be for your next renewal. To provide this service to you, we may send that information to our insurance providers or partners so that they can calculate their quotes. When they do this, our insurance providers or partners may carry out “soft” credit checks on you with credit reference agencies, and these checks may be performed ahead of the renewal date. You may see these “soft” credit checks on your credit report, but they will have no impact on your credit rating (please see section 7 for more details on soft credit checks).

If you do not want to receive communications from us, you can let us know at any time by emailing us at info@wecovered.com.

**5 The legal basis for processing your personal information**

Data protection law says that we can use personal information only if we have a proper reason to do so such as consent or legitimate interests.

Our grounds for processing your personal information are as follows:

**1. Consent** – Where we rely on this legal basis, we will collect and process your personal information only if you have given your consent for us to do so, for example, we will only send you certain marketing emails where you have agreed to this.

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

**2. Legitimate Interests** - 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. We may use and process some of your personal information where we have legitimate business grounds for doing so. We have carried out a legitimate interest assessment in respect of each processing activity for which legitimate interest is our lawful basis. Our legitimate interests for processing your personal information are:

* 2.1in relation to certain aspects of our services: the use of data processors in respect to the provision of the services (as described at section 6); processing any transaction between you and a third party; and tracking sales. Using your information in this way is an essential part of us being able to provide the services to you.
* 2.2service communications: we need to keep you informed about your use of the services for example and in respect to the annual renewal service (see section 4 for more information); and
* 2.3 to monitor and improve our service: we may use your personal information for research, such as analysing market trends and gathering information on how you use our website or app.

You have a right to object to our use of your personal information for these legitimate interests (please see section 13 below).

**3. Contract** – It may be necessary for us to process your personal information to perform a contract to which you are party (e.g. providing you with a service), or to take steps at your request to you entering into a contract.

**6 Who do we share your personal information with**

When you use any of our services, we may disclose your personal information to the following parties:

* **1. Providers and Partners**
This includes companies whose products or services are included on our website or app, with a view to them providing you with a quote. When these companies use your personal information in this way, they will be acting as data controllers of your information and therefore we advise you to read your chosen provider’s or partners privacy policy. Some providers or partners with whom we share your information may use it for analytical purposes.
* **2. Data Processors**
In order to provide the services, we may use third parties to process personal information on our behalf for tasks such as vehicle look up, house rebuild value, post code look up, host service provider and facilitating email communications with you. Also, for some products we may use quote facilities used by the providers or partners to help facilitate the provision of a quote for you. The companies that provide these quote facilities act as data processors for us and/or the providers or partners.

We may also use certain data processors for analytical purposes, for example, to help us understand how well our website or app is performing and how you use our website and app.

Where third parties process your personal information on our behalf, we will ensure that they have the necessary high standards of security in place so that your data is kept secure and only used in accordance with this Privacy Policy.
* **3. Regulatory or governing bodies**
We may need to pass information including personal data such ASTO regulatory bodies such as the Financial Conduct Authority for the purposes of compliance monitoring. This is a legal or regulatory obligation on us.
* **4. Introducer websites**
Where you have been introduced to our website from another independent website (introducer website), and where you have provided the necessary consent on our quote form, we may send that introducer website certain personal information relating to you for reasons which you have agreed to. We are not responsible or liable for the use or processing by the introducer of that data.

Where permitted by data protection and privacy law, we may also disclose information about you (including electronic identifiers such as IP addresses):

* if required or permitted to do so by law.
* if required to do so by any court, the Financial Conduct Authority, the Competition and Markets Authority or any other applicable regulatory, compliance, Governmental or law enforcement agency.
* if necessary, in connection with legal proceedings or potential legal proceedings; and/or
* in connection with the sale or potential sale of all or part of our business.

If we reasonably believe false or inaccurate information has been provided and fraud is suspected, details may be passed to fraud prevention agencies to prevent fraud and money laundering.

**7 How do providers and partners use your personal data**

If we transfer personal data about you to providers or partners, it will be solely to enable them to provide a quote for you. Providers or partners will be acting as data controllers in respect to any use by them of personal data transferred by us to them. You should read your chosen provider’s or partners privacy policy when given the opportunity to do so.

To ensure providers or partners have the necessary facts to assess your insurance risk, verify your identity, to help prevent fraud and to provide you with their best premium and payment options, they may obtain information from third parties at quotation and renewal and in certain circumstances where policy amendments are requested. The checks may be against both public data (such as information from the electoral roll) and private data (such as your credit history).

This information may include a quotation search from a credit referencing agency. This search will appear on your credit report and will be visible to other credit providers. It will be clear that this is a quotation rather than a credit application by you to pay by monthly instalments. This may happen regardless of whether you get a quote via the internet, app, or phone for any of these services.

Some providers or partners may use the personal data you provide to obtain a quote for their own internal purposes such as fraud prevention or for internal analysis (such as monitoring customer demographics, market trends or pricing analysis). Some of the providers or partners may also use personal data they hold about you (or which is held by other members of their group or in some instances the company whose brand is administered by them) from loyalty schemes and other account information. Some providers or partners may pass this personal data to their insurance underwriters.

Providers or partners may also exchange information about you through various databases, such as the Claims and Underwriting Exchange (CUE), which holds a record of incidents reported to providers or partners by policyholders and third party claimants, as a way to help prevent fraud. Providers or partners may also exchange information with other databases such as the No Claims Discount Database, the Motor Insurance Anti-Fraud and Theft Register, run by the Association of British Insurers (ABI), and the Hunter Database (a central insurance and claims checking system). Providers or partners may also share information with insurance underwriters. As mentioned above, the exchange of your information in this way allows providers or partners to verify the information that is provided during the quote process and helps detect fraudulent claims.

If you provide us with your driving licence number (‘DLN’) via our quote form the providers or partners may pass this information to the DVLA in order for a search to be carried out to confirm your (or any named driver’s) licence status, entitlement and relevant restriction information and endorsement/conviction data. Carrying out these searches help providers or partners to validate your information, preventing fraud and reducing incidents of negligent misrepresentation and non-disclosure. DLN searches may be carried out as part of your quote or at any point throughout the duration of your insurance policy. These searches will not appear on your (or the named driver’s) driving licence record information. For details of the information about you that the DVLA may hold, please see <https://www.gov.uk/government/organisations/driver-and-vehicle-licensing-agency> or <http://www.mylicence.org.uk/>.

Some providers or partners who offer products designed for students or graduates may also undertake additional checks against higher education sources to verify your student or graduate status.

If you decide to enter into a contract with a provider or partner through this website or app, the information you have provided to us, together with any further information requested by, and supplied by you or us to the provider or partner, will be held by the provider or partner for the purposes set out in that provider’s or partners privacy policy. Therefore, **you are strongly advised to read your chosen provider’s or partners privacy policy** and satisfy yourself as to the purposes for which the provider or partner will use your personal information before entering the contract. We have no responsibility for the uses to which a provider or partner puts your personal information.

**8 Contact from Providers or Partners**

In relation to our online insurance service, if during the quote process you tell us that you are happy to be contacted by providers or partners, you agree that your personal data may be used by the top three competing providers or partners who provided you with the cheapest quotes to contact you with a view to seeing if you are interested in purchasing the quoted product.

Please note that the companies contacting you are solely based on the cheapest price retrieved not exclusively based on the cover you selected.

Where our offline insurance service is used, providers or partners will contact you directly to provide a quote by telephone and where you have provided consent, by email and/or SMS.

If you click through to a third-party website from our website or app, we cannot guarantee you will not be contacted by those parties. We are not responsible for the privacy policies and practices of other websites or app. Whenever possible we will only partner with other websites or app which maintain the same standards as are present on our own website or app but we cannot guarantee this. If you click through to any providers or partners to their own website, you will be subject to that provider’s or partners website terms and conditions and privacy policy which we would recommend you read carefully. By using that service, you will need to review and agree to their own Privacy Policy and Terms and Conditions.

If you no longer wish to be contacted by providers or partners for marketing purposes, please follow the instructions in their marketing communications, or consult their privacy policies for further information about unsubscribing.

**9 How long do we retain your personal information**

Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy or until you request it is deleted. Even if we delete your personal information it may persist on backup or archival media for legal, tax or regulatory purposes.

QI Group LTD is regulated and authorised by the Financial Conduct Authority (FCA) for non-investment insurance mediation and credit broking. As part of our FCA authorisation we must comply with certain requirements in respect of the Financial Ombudsman Service and the Financial Services Compensation Scheme. All these obligations places certain recording keeping requirements and the need to co-operate and share information with these legal entities where requested to do so.

We also handle the above data for our own legitimate business interests including but not limited to, the keeping of records and accounts, staff training and monitoring, recording sales or quotation requests generated, communicating with providers or partners and in marketing out other similar services to you or reminding you if a renewal comes up.

**10. Do we pass data to third parties**

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

**11. Transferring your data outside of the European Economic Area (EEA)**

From time to time there may be a requirement to process your personal data in other countries outside of the European Economic Area where data protection safeguards differ to those of the UK. Where this is necessary, we will ensure that your data is kept securely and only processed in accordance with the data protection legislation. Your use of our services will be an indication of your consent to this transfer.

Please note that some providers or partners may carry out some of their administrative services from outside of the EEA. Where this is the case it will be set out in their terms and conditions and privacy policy.

**12. Cookies and IP logging**

This website uses cookies. A cookie is a piece of data that may be stored on your computer while you visit a website. The cookie stored by this website will be used to identify your computer. You may disable the use of cookies in your internet browser, but this will restrict your use of our website. You will not be able to use our quote service.

When you visit our website, our server will automatically record your IP address and the time and duration of your visit. We may also use the records of the pages you visit on this website to analyse trends, administer the site and track your movements through the website so that we can improve the usability of and access to the website.

This website also uses Google Analytics to allow us to monitor how users use our website.

Please see our cookie policy for more information including how you can stop or manage cookies.

*Advertisements*

The advertisements that you see displayed on our website are delivered by certain third-party advertising companies. No information which identifies you, for example your name, address, email address or telephone number, is used to provide this advertising. Sometimes we may use cookies to show you wecovered.com adverts while you are online. You can find out more about this and how to turn off cookies by reading our cookie policy.

**13. Privacy Rights**

We respect the fact that your personal information is your information so we want to be clear about what rights you have under data protection legislation and how you can exercise them.

* **1. The right to opt out of having your information used for marketing**
Please see section 4 “How we use your data and communications from us”.
* **2. The right to have any inaccuracies in your personal information corrected**
Please help us to help you by keeping your contact details up to date and letting us know if you spot any errors in the information we hold about you. If it is something you cannot correct yourself online or when carrying out another quote, you should contact us at info@wecovered.com. We will update inaccuracies promptly, and within a month where possible if you are requesting a more complex change. If we take the decision not to make a change you have requested, we will explain why. If you disagree with our decision, you have the right to complain to the privacy regulator (details set out below).
* **3. Your ‘right of objection’ to certain activities**
Data protection law gives you the right to express an objection to activities detailed in section 5 regarding legitimate interests. You may believe your privacy rights outweigh the legitimate interest we have as a business in doing those things. **Please read that section carefully before getting in touch with us and note that exercising your right of objection may mean that the service will not be available to you.**

In relation to our offline insurance service, some automated decision making may take place in relation to the way we pass your details to providers or partners. This is necessary for providing the service to you. Please do not use our service if you object to the use of your information in this way.

If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we are continuing to process your personal information. If you disagree with our decision on this, you have the right to complain to the privacy regulator.
* **4. Your right to erasure**
You have the right to request that we delete or remove your personal information from our systems.

Please see section 9 “How long do we retain your personal information” before contacting us.

If you still wish to exercise your right, you should contact us at compliance@wecovered.com and we will respond to your request within a month.
* **5. The right to access the data we hold about you**

You have the right to request copies of the personal information we hold about you.

Once we’ve received your request we will provide our response within one month. If your request is unusually complex and likely to take longer than a month, we will let you know as soon as we can and tell you how long we think it will take.
* **6. Your right to restrict our use of your information**
You have the right to “block” us from using your personal information or limit the way in which we can use it.
* **7.Your right to ‘Data Portability’**
The right to ‘data portability’ aims to enable consumers to re-use some of their personal information online by making it available in a commonly-used, machine-readable format that can be passed to and used by other organisations.
* **8.Exercising your rights**
If you wish to exercise any of your rights set out in this Privacy Policy, make an enquiry or make a complaint then please contact: compliance@wecovered.com or contact via post at:

The Data Protection Officer
QI Group LTD

The HQ,

Dell Road,

Rochdale

OL12 6BZ

We reserve the right, where applicable, to request confirmation of your identity before acting.

**14 Security**

We do our best to keep the information you disclose to us secure. We place a high priority on protecting and managing data in accordance with accepted standards.

We will also, where it is appropriate, ensure that our website uses https to help keep information about you secure.

However, we cannot guarantee or warrant the security of any information which you send to us, and you do so at your own risk. By using our website or app you accept the inherent risks of providing information online and will not hold us responsible for any breach of security.

**15. Changes to this Privacy Policy**

We reserve the right to change this Privacy Policy from time to time. You should therefore check this Privacy Policy each time you visit our website. Where required by law we will obtain your consent to make these changes. If you do not agree with any changes, please do not continue to use this website or app.

**Updated December 2020**