Privacy

Introduction

Acorn Insurance and Financial Services Limited respects your privacy and is committed to protecting your personal data in line with the UK GDPR. This privacy notice tells you how we look after your personal data and tells you about your privacy rights and how the law protects you.

Acorn Insurance and Financial Services Limited trade as, or are branded as: Acorn Insurance, Acorn Insurance Group, Haven Claims, Acorn Claims, Acorn Protect, Granite Underwriting, Ladies First, Motorcade Insurance, Briefly, Brieflycover, Street Cover, Pay how you Drive, Carrot Insurance Service, Flag Insurance (Brokers), MyPolicy, Jurny and TaxiMaster Insurance.

Your personal data is handled with the utmost care and security. We only collect and use your information for legitimate purposes, ensuring it is protected against unauthorised access. You have full control over your data, with rights to access, correct, or delete it at any time. Rest assured, your privacy is our priority, and we are dedicated to safeguarding your personal information.

We have layered this privacy notice to make it easier to navigate.

Section 1 - provides background information about our company and how to contact us with any data protection requests or queries.

Section 2 - describes the type of data we collect and what happens if you do not provide us with the data needed to provide our services to you.

Section 3 - explains how we collect the data we process.

Section 4 - describes the purposes and lawful basis on which we process your data. This includes information about automated decision making, call recordings and telematics devices.

Section 5 - describes the circumstances we may use your data for marketing purposes, our use of cookies and the social media companies we engage with.

Section 6 - explains who we share your data with. Please note we do not sell or share data with companies outside of our group for marketing other companies' products. This section also includes links to the privacy notices of credit reference agencies.

Section 7 - describes the security measures we have in place to protect your data.

Section 8 - provides assurances about the retention of your data.

Section 9 - includes a glossary of data protection terms.

Section 10 - details your rights under data protection law.

1 Important information

- **Purpose**

  This privacy notice aims to give you information about how Acorn Insurance and Financial Services Limited, collects and processes your personal data as a customer, and/or through your use of this website, in accordance with the Data Protection Act 2018 and the United Kingdom General Data Protection Regulation.

  It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

- **Controller/Processor**

  Acorn Insurance and Financial Services Limited, authorised and regulated by the Financial Conduct Authority, acts as the Data Controller registered with the Information Commissioner's Officer (ICO) with registration number Z6512233. We are responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice). We also act as a Data Processor, however the information in this notice reflects our use as a controller.

  We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise any of the legal rights detailed in section 10, please contact our Data Protection team using the details set out below.

- **Contact details**

Acorn Insurance and Financial Services Limited 98 Liverpool Road, Formby, Liverpool, L37 6BS
dataprotection@theacorngroup.com

- **Third-party links**

  This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. Please also be aware that we are not responsible for the security or content of these external sites or services. Accessing them is at your own risk and subject to their respective terms and policies.

2 The data we collect and process about you

- **What this means**

  Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

  We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

a) Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth.

b) Contact Data includes billing address, delivery address, email address and telephone numbers.

c) Financial Data includes bank account, credit history and payment card details.

d) Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

e) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

f) Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

g) Usage Data includes information about how you use our website, products and services.

h) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

i) Policy Data includes information on quotes, vehicle(s) / property, your current policy as well as lapsed and cancelled policies you might have had with us.

j) Claims Data includes information about non-fault and fault claims you have made with us and other insurers. This includes data sent to us by 3rd parties where we act as a controller.

k) Telematics Data includes information collected on your location, mileage, speed related data, date/time, data that indicates commercial use, overnight parking, journey data and other driving characteristics as part of any policy that you purchase from us that requires you to have a telematics tracking device installed.

l) Vulnerability Data includes information on any characteristics of vulnerability that you disclose to us, which enables us to provide the appropriate level of support your circumstances dictate. This may include Health Data which is defined as Special Category data (see below). We also limit the data retained on our systems in line with best practice.

m) Images recorded on our CCTV systems or taken of you by photo or video with your consent.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not intentionally collect the following Special Categories of Personal Data about you (except where detailed immediately below): details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership and information about genetic and biometric data.

We do collect details about your vehicle, health and criminal convictions for the purposes

of calculating the risk of providing you with insurance (and insuring the vehicle and/or your property). We may also collect health data when discussing any vulnerabilities you may have so that we can assist and support you. Finally, we may collect details about your health for the purposes of personal injury assessment when administering and handling claims.

- **Children's personal data**
  We may collect and process personal data of children for the purpose of administering and handling claims involving children under the age of 18. All correspondence in relation to a claim will be sent to the adult who has parental responsibility for the child or a litigation representative.

  We may collect and process personal data of young drivers aged 17 years, for the purposes of obtaining insurance quotes and to administer insurance policies, from insurers in relation to our products designed for young drivers.

  We acknowledge children have the same rights as adults over their personal data.

- **If you fail to provide personal data**

  Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3 How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, webchat, email or otherwise. This includes personal data you provide when you:

  ✓ apply for our products;

  ✓ create an account on our website;

  ✓ request marketing to be sent to you; or

  ✓ give us some feedback or submit messages to us.

- **Automated technologies or interactions.** As you interact with our website or mobile applications, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also collect your data on our CCTV systems if you visit any of our offices. We also deploy AI systems in different parts of the business, and these collect Identity, Contact, Policy and Claims data. For more information on our use of AI systems, see Section 4.

- **Technical Data** from use of the telematics tracking device (as further described in this notice).

- **Third parties or publicly available sources**. We may receive personal data about you

from various third parties and public sources as set out below:

a) Insurance Brokers/Financial advisers

b) Card associations

c) Credit reference agencies

d) Insurers

e) Taxi operators

f) Comparison websites

g) Social networks

h) Fraud prevention agencies

i) Payroll service providers

j) Land agents

k) Public information sources such as Companies House

l) Agents working on our behalf

m) Government and law enforcement agencies.

n) 3rd Parties that provide evidence in relation to claims

o) Your employer (Fleet Policies only)

p) The Motor Insurers' Bureau (MIB) via their MyLicence online service

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

✓ Where we need to perform the contract we are about to enter in to or have entered in to with you.

✓ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

✓ Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data however if we do, you have the right to withdraw consent at any time by contacting us, using the email address in section 1 of this notice.

We may also collect your data when our policyholder nominates you to act on their behalf, or where you are identified as a named driver on one of our policies. If you are the Policy Holder, you must have the named driver's permission to share their data.

4 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new customer and/or to process your insurance quote and/or policy	(a) Identity (b) Contact (i) Policy (k) Telematics (l) Vulnerability	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to verify insurance with taxi operators)
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Validation, Credit checks and fraud prevention	(a) Identity (b) Contact (c) Financial (d) Transaction (h) Marketing and Communications (l) Vulnerability	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To administer and handle claims including validation, collecting evidence	(a) Identity (b) Contact (j) Claims (l) Vulnerability	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary to comply with a legal obligation
To manage and administer our relationship with you which may include: (a) Notifying you about changes to our terms or privacy policy (b) Managing complaints (c) Asking you to leave a review or take a survey	(a) Identity (b) Contact (f) Profile (h) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products)

(d) Responding to requests made under Data Protection Legislation		
To process information on any characteristics of vulnerability that you disclose to us.	(l) Vulnerability	(l) Necessary for our legitimate interests (to provide appropriate support to customers with additional needs)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, development, support, reporting and hosting of data)	(a) Identity (b) Contact (e) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud, for security and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To validate your taxi Insurance with your taxi operator	(a) Identity (j) Policy	Necessary for our legitimate interests in supporting you, our customer, to demonstrate valid insurance
To deliver communications required to meet our compliance obligations	(a) Identity (b) Contact (j) Policy (l) Vulnerability	Necessary for our legal obligation to deliver regulatory regulation messages and to support you
To conduct in-house training of our staff	(a) Identity (b) Contact (c) Financial (d) Transaction (f) Profile (h) Marketing (i) Policy (j) claims (k) Telematics	Necessary for our legal obligation to train staff to suitably support customers
To deliver relevant website content and advertisements to you, measure or understand the effectiveness of the advertising we serve to you, and elicit nominations for award schemes.	(a) Identity (b) Contact (e) Technical (f) Profile (g) Usage (h) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(e) Technical (g) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To market to you and make suggestions and explain the options available to you to you about goods or services that may be of interest to you	(a) Identity (b) Contact (e) Technical (f) Profile (g) Usage (h) Marketing and Communications	Necessary for our legitimate interests (to develop our products and grow our business)
To contact you via email SMS and phone regarding outstanding documentation and to inform you of our office opening times over holiday periods etc. and about your renewals and as required by the FCA (Financial Conduct Authority)	(a) Identity (b) Contact (h) Marketing and Communications	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To protect Physical Security of our offices	(m) Recorded Images	Necessary for our legitimate interests of security.
To promote our products using photos and videos taken of you	(m) Recorded Images	Consent

Please note we reserve the right under legitimate interests to share your data for the purposes of sale, transfer or merging of our group of companies.

- **Fraud Prevention**

Before and during the provision of services or goods to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. We process your personal data on the basis that we need to take steps to prevent fraud and money laundering, and to verify identity, in order to perform our contract with you and to protect our business and comply with laws that apply to us. Such processing is a contractual requirement of the services you have requested. We conduct some of these checks using an AI system, as described in Section 4.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you have requested, or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you.

- **Telephone Calls**

We may record telephone calls for training and monitoring purposes, to comply with regulatory obligations, to demonstrate services levels are being achieved or identify improvements, and to assist with the resolution of enquiries and complaints. Wherever possible, on our main telephone numbers, an automated message will notify you that calls are being recorded however please note it may not always be possible to notify you.

- **Telematics tracking device**

Where you purchase a policy from us that requires you to install a telematics tracking device in your vehicle, we will (at the time of usage) collect information on use of your vehicle and how it is driven, including: the speed of your vehicle, acceleration, braking, cornering, time of usage and mileage.

The above information will be used to build a profile of how, where and when your vehicle is driven. We will use this information to identify extreme driving events which could result in an additional fee being charged to you or, the cancellation of your policy.

We will also monitor the data collected from the telematics tracking device to calculate your total mileage. Where this exceeds the amounts stated on the schedule of your total driving mileage (as set out in your policy), your Insurer reserves the right to cancel your policy.

The GPS location data obtained from the telematics tracking device assists us in assessing the types of roads you use and may also help the police recover your vehicle if it is stolen. We may release your data to the police or to a civil authority where we have a lawful basis for doing so, where we suspect fraud (or attempted fraud) or, if we are required to do so by law.

Where your policy is cancelled due to extreme driving, this information will be shared with other insurers and may lead third party insurance providers to refuse your application for motor insurance.

Your device is installed in your vehicle by you, or by our suppliers, HPC (Hyde Park Corner) They also maintain the device and monitor it for faults. Data from the tracking device is collected by our suppliers, IMS, Thing Co, Howdens or Trakm8, via a mobile data link.

IMS, Thing Co, Howden and Trakm8 may use certain data collected to improve their product and services. This will be carried out in an aggregated format using anonymisation techniques.

It is important that you read their Privacy Notices available on their websites to understand how your data will be processed. If you have any questions regarding the data collected by our partners as part of the services they provide to you and us, you can contact them via their websites as follows:

Trakm8 - www.trakm8.com/driver-privacy-policy

IMS - https://ims.tech/privacy-policy/

Thing Co - https://thingco.com/privacy-policy

Howden - http://www.howdengroup.com/uk-en/privacy-data-protection-policy

How we use your information to make automated decisions and predictions

We sometimes use AI systems to make automated decisions, predictions, or to answer your queries based on personal data we have - or can collect from others - about you or your business. This helps us to make sure our decisions are quick, fair, efficient, and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the price that we charge you for them.

Here are the types of decision, prediction and task we use AI systems to assist with:

1. **Quotes and pricing**

When you ask for a quote from us, we use AI systems to check the market to get the best price and product for you. This may include checking age, residency or financial position. Based on what we know, we use AI systems to generate prices for products and services. The prices generated are based on our internal pricing policy, which means the AI systems execute our internal decisions but do not make decision on their own.

2. Detecting fraud

We use AI systems to predict if your insurance policy is being used for fraud or money-laundering. The systems may detect that a policy is being used in ways that fraudsters work, or that a policy is being used in a way that is unusual for you. Where the AI system identifies potential fraud, a member of staff reviews the prediction to determine if further investigation is needed. If we think there is a risk of fraud, we may stop activity on your policy or cancel it.

3. Determining liability

We use an AI system to predict which party is likely to be responsible for an incident. A member of staff always makes the final decision and communicates it to the relevant parties. You may dispute any decision made and submit evidence to support your appeal.

4. Answering queries and directing calls
Our live chat function uses an AI system commonly known as a 'virtual assistant' (VA). The VA answers your questions using information that members of staff have identified as most likely to be the answer you are looking for. The VA looks for common queries or key words and makes suggestions to staff members for ways to improve future answers. The final decision on what information the VA can use to answer your query always lies with a member of staff. We also use an AI system to direct calls to the correct department based on the reason you give for calling.

5. Approving credit
If you apply for credit with us, we use an AI system to decide whether to lend money to you - this is called credit scoring. The system uses past data to assess how you are likely to act when paying back any money you borrow. This includes data about similar accounts you may have had before.
Credit scoring uses data from three sources:

- Your application form
- Credit reference agencies
- Data we may already hold.

It gives an overall assessment based on the above. Banks and other lenders use this to help us make responsible lending decisions that are fair and informed. Credit scoring methods are tested regularly to make sure they are fair and unbiased.

Our right to make automated decisions about you
Where we make automated decisions about you that have a legal, or similarly significant, effect, we only do so when the decision is necessary to enter into or perform a contract with you, or when a member of staff has reviewed the decision. This applies to scenarios 2, 3 and 5 above. Scenario 1 does not constitute automated decision *making* for the reasons explained above, whilst scenario 4 does not result in legal or similarly significant effects. If you want to know more about this, please contact us using the contact details in Section 1 of this notice.

How we use your information for profiling

We sometimes use information about you, such as age, residency type or financial situation, to make predictions about products you might be interested in, or about how you might act when paying back any money you borrow. We also use this information to make decisions about what price to charge for our products and services. This is called 'profiling', a type of automated processing that uses your personal data to analyse you or make predictions about you. We use AI systems to carry out the profiling, as described in the section above.

Where we carry out profiling to predict how you might act when paying back any money you borrow, or what price to charge for our products, we need to do this to decide whether we can enter into a contract with you.

5 Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data 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 call this marketing).

- **Direct marketing**

Where you have contacted us about one or more of our products or services, we, and affiliated companies in our group, may send you further direct marketing communications about similar products and services unless you opt-out as directed in our telephone automated message system. We may contact you by email, text message or by phone based on your marketing preferences. We will ensure that you are given the option to update your marketing preferences when you first contact us and whenever we send marketing communications.

We, and affiliated companies in our group are Acorn Insurance and Financial Services Limited, Rapid Vehicle Management Limited, MyPolicy, and Granite Finance Limited.

To ensure our online advertising is better targeted, we provide hashed versions of your email address and mobile phone number to Google Ads. See Section 6 O) for more information.

It is important to note that you have the right to ask us to stop directly marketing to you at any time by contacting our data protection team on dataprotection@theacorngroup.com or by telephone with our customer service department, using 01704 339000 Option 3

- **Cookies**

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 allows us to improve our website, products and services. For detailed information on the cookies we use and the purposes for which we use them please see paragraph (b) below.

We may use them for:

a) per-session cookies are used while you are logged on to our website to record temporary data relating to your visit to our website, to manage the delivery of web pages to; you and any registration and ordering processes, and to help us monitor traffic through the Website; and

b) logon and usage cookies store some data between visits to our Website in order to allow you to log on to your account more easily, and using them we are able to personalise your experience and create a database of your previous choices and preferences, and in situations where those choices or preferences need to be collected again, they can be supplied by us automatically, saving you time and effort. For example, after you purchase a product once, if you need to purchase it again your previous selection of options will be retained and can be re-entered more quickly.

c) performance cookies that allow us to understand how visitors use our websites and where appropriate help us to provide marketing communications that we think may be of interest to you (where we have a lawful basis to do so).

If you do not want to use cookies most internet browser programs have extensions that will allow you to block them . Should you do this you will still be able to access most of our

website as normal but some processes that depend on cookies may not work properly. We also provide the choice as to which cookies to accept.

6 Disclosures of your personal data

- **Purposes of disclosure and recipients**

We do not share personal data with any third parties except as provided below or as required by law. For information, when you provide us with any information about other people, such as named drivers, please ensure you have their permission as we may also share their data with the third party agencies listed below:

a) Motor Insurers Bureau (MIB)

Where you take out an insurance policy with us, information about your policy will be added to the Motor Insurance Database (MID). The MID is managed by the MIB and data which is stored on it may be used by certain statutory and/or authorised bodies (including the police, DVLA, DVLNI and the Insurance Fraud Bureau).

This information may be used for various purposes permitted by law, which include but are not limited to:

- ✓ Electronic Licensing
- ✓ Continuous insurance enforcement
- ✓ Law enforcement (prevention, detection, apprehension and/or prosecution of offenders)
- ✓ The provision of government services and/or other services aimed at reducing the level and incidence of uninsured driving.

If you are involved in a road traffic accident (either in the UK, the European Economic Area or certain other territories), insurers and/or the MIB may search the MID to obtain relevant information.

Persons (including his or her appointed representative) pursuing a claim in respect of a road traffic accident (including citizens of other countries) may also obtain relevant information which is held on the MID.

Information which is supplied to fraud prevention agencies and databases such as MID can include details such as your name, address and date of birth together with details of any injury arising from a claim. Your data may be supplied to an industry database in order to facilitate automatic no claim discount validation checks.

We may use the information supplied to fraud prevention agencies and industry databases such as the MID for fraud prevention purposes.

b) DVLA and Claims Management

We may share your driving licence number with the DVLA to confirm the status of your driving licence, entitlement and any information relating to restrictions/endorsements/convictions. We may carry out these searches before issuing you with an insurance policy and/or at any point during the term of your policy.

In the event of a claim, where necessary we may share your personal data with Claims Investigators, Engineers, Medical Assessors/Providers, Hire Vehicle Providers, Repairers, Solicitors, Reinsurers, Salvage Agents, Windscreen Repairers. We may need to disclose information with any other party involved in that claim such as third parties involved in the incident, their insurer, solicitor or representative and medical teams, the police or other investigators. We also may have to investigate your claims and conviction history. We may also have to share your personal data where necessary with the Compensation Recovery Unit, Department for Work and Pensions, and National Health Service in relation to a claim.

c) Payment processing

Your personal data may be processed by third parties who provide other processing services to us and we may transfer personal data to third party payment processors in order to process payments for orders (such as credit and debit card processing companies). If we use a third-party order processing service, they will collect and send your data to us securely, which will then be incorporated into our databases.

d) Insurers / Brokers

We will use your personal data to obtain quotes from insurance underwriters to provide you with an insurance quote. As part of the quote process, we may exchange information with various industry databases to verify that you have provided all information required and that it is accurate, such as the Claims and Underwriting Exchange (CUE), the Hunter Database, the Motor Insurance Anti-Fraud and Theft Register or the No Claims Discount Database. We may also carry out checks against data we already hold on you such as data from existing products or account data. We may use this data to help assess and rate your application for a quote and determine your premiums.

We may also disclose your data to any Insurance Brokers operating on your behalf.

We will also share your data with your Insurer.

e) Third party service providers

In addition to the third parties we have already mentioned in this privacy notice, we may have your personal data processed by other third parties throughout the world who act for or on our behalf; for example, we may use cloud computing or remote database hosting services which may be located anywhere in the world and we may engage contractors anywhere in the world for the purposes of providing back-office services to us,

including website hosting, order processing, order fulfilment, application and database hosting, data processing services, or that help us market out products and services. We also engage contractors to provide vehicle recovery and repair services. Where necessary, we provide these contractors with information on support needs you have disclosed to us. We only do this if we believe our contractor needs to know your support need to be able to provide the vehicle recovery or repair service you require. These companies will process and hold information about you in order to perform their functions. These companies are not authorised to use the information they process for us for any other purpose than those to which we have notified you under this privacy notice. Please see 'International Transfers' in section 6.

f) Group companies

For operational efficiency and to ensure you are provided with the best possible service, certain services and operational activities may be carried out on our behalf by other companies in our Group. We ensure strict measures are in place between the companies in our Group to ensure your personal data is processed in accordance with this privacy notice.

g) Taxi Operators

We may share certain personal data to verify the status/terms of your motor insurance policy ("insurance verification") with your designated taxi operator. We do this to assist you in verifying your insurance documents, and, to support the operator in ensuring their drivers maintain the required insurance in accordance with regulatory requirements. Your taxi operator will have communicated with you about your participation in such verification service if this arrangement is in place. Your operator will not be authorised to use the information for any other purpose.

h) Legal requirements and Regulators

We may share or transfer your personal data to a government authority where required to comply with a legal requirement, for the administration of justice, or where reasonably required to protect you or your company's vital interests.

We may share your personal data with the Financial Ombudsman Service, if you make a complaint about the service we have provided. We may also share your data with other industry regulators who monitor and enforce our compliance with any applicable regulations.

i) Corporate Transfer

We may transfer your personal data to any company that purchases or otherwise acquires our business in the event of a corporate sale, merger, reorganisation, dissolution or similar event.

j) Statistics

We may use your personal data along with other data to provide statistics on an anonymous basis to our contractors, marketing partners (including banks and other institutions who may promote our products to their customers), and other companies and organisations we deal with, for a range of purposes, including assessing and reporting on the overall performance of our products and website, assessing and reporting on overall product take-up and usage, assessment and reporting on malware and unsafe websites and associated threats and risks in general or for any group of customers.

k) Credit Reference Agencies

We carry out credit and identity checks when you apply for finance or other services from us. We may use Credit Reference Agencies (CRAs) to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal data with CRAs, and they will give us information about you. The data we exchange may include:

- ✓ Name, address and date of birth
- ✓ Credit application
- ✓ Details of any shared credit
- ✓ Financial situation and history
- ✓ Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- ✓ Assess whether you can afford to make repayments
- ✓ Make sure what you've told us is true and correct
- ✓ Help detect and prevent financial crime
- ✓ Manage accounts with us
- ✓ Trace and recover debts
- ✓ Make sure that we tell you about relevant offers.

When we ask CRAs about you, they will note it on your credit file. This is called a credit search. Other lenders may see this, and we may see credit searches from other lenders.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice (CRAIN). This includes details about:

- ✓ Who they are
- ✓ Their role as fraud prevention agencies
- ✓ The data they hold and how they use it
- ✓ How they share personal data
- ✓ How long they can keep data
- ✓ Your data protection rights.

If you'd like to know about the information the credit-reference agencies hold about you, you should contact them directly – but please note, they may charge you a fee for this service (unless they are prevented from doing so by relevant laws). Not every agency will hold the same information, so you should consider contacting them all. You can contact:

TransUnion International UK Limited
CRAIN: www.transunion.co.uk/legal/privacy-centre
0330 024 7574
One Park Lane, Leeds, West Yorkshire, LS3 1EP
www.transunion.co.uk/contact-us

Equifax Limited
CRAIN: www.equifax.co.uk/crain/
0800 014 2955
Customer Service Centre, PO Box 10036, Leicester, LE3 4FS
www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html

Experian Limited
CRAIN: www.experian.co.uk/legal/crain/
0344 481 0800 or 0800 013 8888
Experian, PO BOX 9000, Nottingham, NG80 7WP
www.experian.co.uk/consumer/contact-us/index.html

L) Social Media Companies

We also use various social media channels to allow you to share claims information, provide support and answers for you and/or as part of our marketing activities. The social media companies act as joint controllers with us with respect to cookies and separate controllers if you contact us via the social media channel. This is on the basis that they determine how your data is managed after you engage with us.

WhatsApp privacy notice (Meta)
Facebook privacy notice (Meta)
Instagram privacy notice (Meta)
X privacy notice
Youtube (Google)
LinkedIn

M) Aggregators

Where we receive your data from an aggregator (such as a Price Comparison website), and if you become a customer, our contractual obligation requires us to share some customer data with that aggregator, for quality assurance purposes. Please consult the aggregators' Privacy Notices to understand how they manage your data.

N) General Suppliers

We have partners providing risk management, validation and telematics services, and we share your data with them in order to provide you with services or a quote. We use a company called Lexis Nexis to provide some these services and their privacy notice can be found here - https://risk.lexisnexis.co.uk/processing-notices/insurance-services.

O) Internet Service Companies

We provide hashed versions of your email address and mobile phone number to Google Ads. This ensures that you receive appropriate adverts in relation to our products and services when you browse whilst logged into your Google account.

Privacy Policy – Privacy & Terms – Google

We also offer optional add-ons for your Insurance Policy, and we share your data in order for them to be able to provide these services. With these suppliers they act as data controllers for your data which means they determine the means and purpose for processing your data.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

- **International Transfers**

Where we transfer personal data outside the UK or European Economic Area (EEA), we will work with our service providers and partners to ensure appropriate safeguards are in place to protect your personal data and your privacy rights, meeting the standards required to make such a transfer lawful.

7 Information security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 Data retention

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we are required to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for the term of their policy and for a period of seven years after they cease being customers.

In some circumstances you can ask us to delete your data. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9 Glossary

Customer means any person (including individuals, firms and companies and other organisations) who is a customer of Acorn Insurance, including persons who browse, register on or otherwise use our website, or who purchase our products.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure

experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

10 Your legal rights

You have the right to:

a) **Request access to your personal data (commonly known as a "subject access request").** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

b) **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

c) **Request erasure of your personal data. This enables you to ask us to delete or remove personal data** where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

d) **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. This right applies where we process information on any characteristics of vulnerability that you disclose to us. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

e) **Request restriction of processing of your personal data**. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

f) **Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

g) **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

h) **Right not to be subject to automated decision making** where we are using your data using solely automated means that has legal or similarly significant effects. Please see

section 4 of this Privacy Notice for instructions on how to exercise your rights.

i) **Right to be Informed** about the collection and use of your data. This Privacy Notice provides a comprehensive guide to how we use your data, if you have any questions not answered on here, please do not hesitate to contact us using the contact details in section 1.

- **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

- **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a formal complaint about how we handle your personal data at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance at dataprotection@theacorngroup.com.

Alternatively, you can contact the ICO:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 03303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We may amend this privacy notice at any time.

This privacy notice was last updated in September 2026.