

V1.0 - 27/07/2020

1. INTRODUCTION

The purpose of this Addendum is to describe the additional personal data that we collect about you when you use the InzuraGo mobile application software (**App**) and how we use that data.

The App is provided and administered by Inzura Ltd (Inzura) and they act as our data processor in providing the App to you. We remain responsible to you for the personal data collected and processed by the App as we are the data controller. However, we have put in place arrangements with Inzura to ensure that your privacy is respected in accordance with applicable law.

This Addendum is in addition to our main Privacy Policy and does not replace it. This Addendum does not apply to any personal data provided other than in connection with the App. If there is a conflict between the terms of our main Privacy Policy and this Addendum in relation to the personal data collected in connection with the App then the terms of this Addendum shall take priority.

2. THE ADDITIONAL DATA WE COLLECT ABOUT YOU USING THE APP

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

- **Identity Data** includes your title, first name, last name, date of birth, username or similar identifier.
- **Contact Data** includes postal address, email address and telephone/mobile numbers.
- **Insurance Policy Data** data required by us to provide you with a quotation for your insurance, or to administer your insurance policy. This includes: written information, photographs, video, and audio data that we ask you to input to the App.
- **Technical Data** we collect technical data which is included in the information that you provide to us through the App. This includes logging of App usage, phone sensor data (including accelerometer, gyroscope and magnetic compass), GPS location data, and time and date information. GPS location data is limited specifically to information that you have provided using the App.
- **Profile Data** includes your activation pin and password used on our App. We also record the configuration of your phone including Bluetooth and wifi settings status to help direct communications and assist with technical support.
- **Communications Data** includes your history of messages sent by the Inzura service to you in relation to the App.

Inzura uses and shares anonymous **Aggregated Data**. The Aggregated Data we use is always anonymised. It could be derived from your personal data but will **not** directly or indirectly reveal your identity. Examples of this include photographs you have taken, but only after all personally identifiable information is removed using text, face and number plate pixelation algorithms. Inzura uses Aggregated Data for its own business purposes.

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 policy.

Special Category Personal Data

We collect information relating to driving offences, such as failure to obtain insurance, drink or drug driving. We collect this information on the lawful basis described in our main Privacy Policy.

We do not collect any other **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

IF YOU FAIL TO PROVIDE PERSONAL DATA THROUGH THE APP

If you fail to provide personal data through the App, or wish to stop using the App after you have provided your data then we will arrange a manual process to collect the same information. This may take longer than using the App and it may cause delays.

3. HOW PERSONAL DATA IS COLLECTED THROUGH THE APP

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

- **Direct interactions.** You may give us your Identity and Contact Data directly via the App:
- **Automated technologies.** As you interact with the App and provide the required information, we will automatically collect Technical Data about the information you provide to us.
- **Third parties sources.** The App helps you interact directly with the DVLA website to retrieve your personal MyLicence check information.

4. HOW WE USE YOUR PERSONAL DATA COLLECTED THROUGH THE APP

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 into or have entered into 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 obligation.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of all the ways we plan to use your personal data collected through the App:

- To provide and facilitate access to our products and services to you as a customer and to deliver products and services, process payment, communicate with you about products, and services, update our records and generally maintain your accounts with us. In particular to check the information you provide to us in connection with your insurance policy is complete and accurate.
- To manage our relationship with you, including notifying you about changes to our privacy policy and asking you to leave a review or take a survey.
- To administer and protect our business, including for our internal records and references.
- To use data analytics to improve our products and/or services, marketing, customer relationships and experience.
- To make suggestions and recommendations to you about products and/or services that may be of interest to you.
- To prevent or detect fraud.
- To comply with legal or regulatory obligations or in for use in legal proceedings.
- To enable third party suppliers (including Inzura) to carry out services to us or other functions on our behalf when providing products or services to you.

5. DISCLOSURES OF PERSONAL DATA COLLECTED THROUGH THE APP

In addition to any other disclosures we have notified you of under the main Privacy Policy, we will share your personal data with the parties set out below for the purposes set out in section 4 above (under the heading *Purposes for which we will use your personal data*).

- Inzura for the purposes of providing the App.
- Inzura's IT service providers acting as processors who provide; data storage and system administration services to Inzura.

- Inzura shares images with Google Vision to provide services in connection with images provided through the App.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

All personal data collected by the App and processed by Inzura in connection with the App is either processed in the UK or by third parties within the European Economic Area. Where there is a transfer of your data between the UK and the EEA we will comply with the applicable data protection legislation.

7. DATA SECURITY

Inzura has 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, including through the use of appropriate levels of encryption.

We have put in place procedures with Inzura 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

Inzura retains your policy data and documents for as long as is necessary to validate your policy details and operate the features of the App in support of the active policy.

Inzura retains your policy data and documents for a period of 60 days after your policy has expired for the purposes of audit and fraud prevention.

We may keep your personal data for longer periods, please refer to the relevant part of the main Privacy Policy for more information.