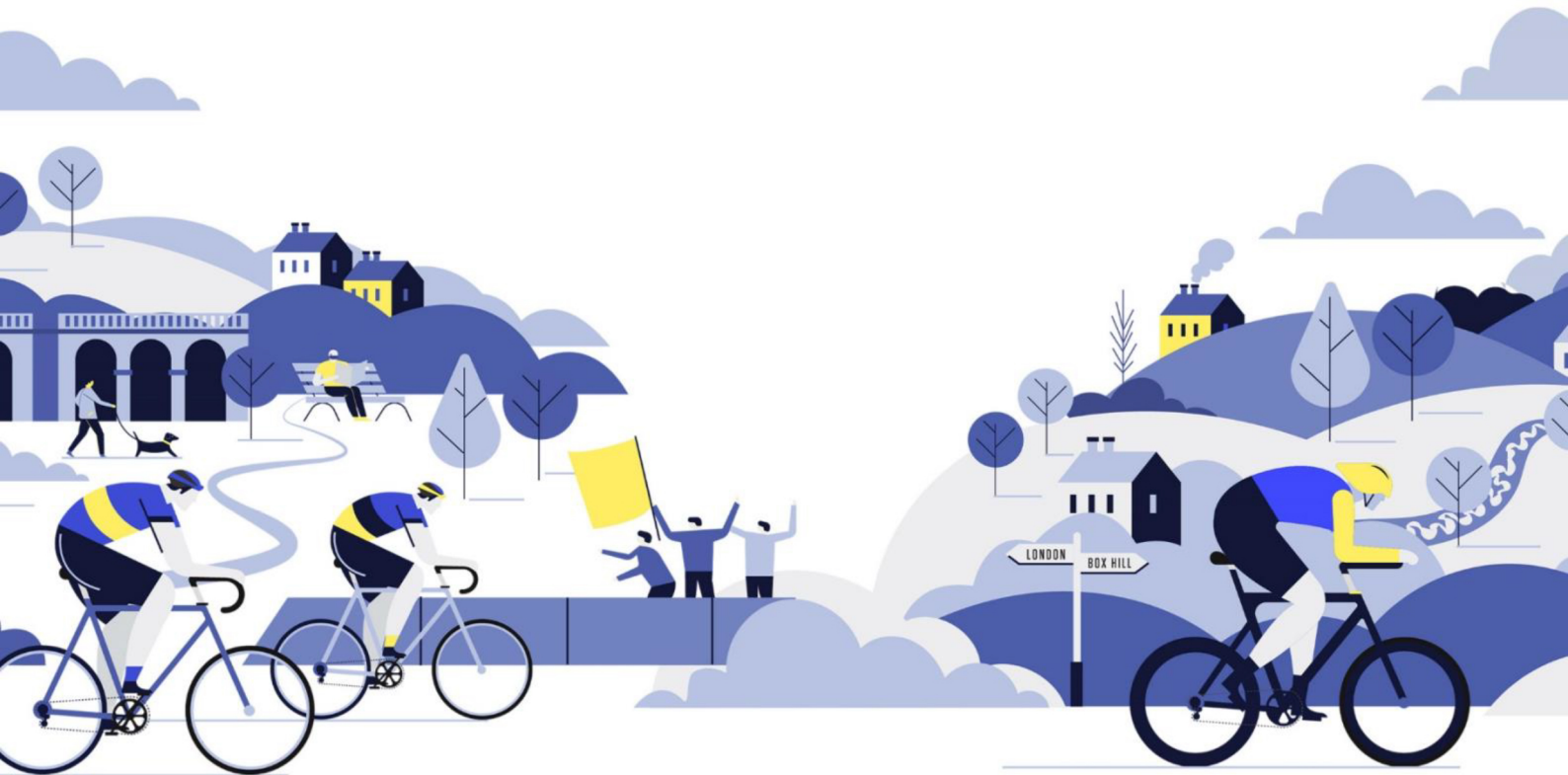


Pedalsure.

Privacy Policy



PRIVACY STATEMENT

Pedalsure No. 2 Limited trading as Pedalsure (firm Reference No. 844669) is an appointed representative of Independent Broking Solutions Limited which is authorised by the by the Financial Conduct Authority (firm reference no.312026). Dukes House Insurance Limited is a company registered in the Bailiwick of Guernsey under the Companies (Guernsey) Law 2008 (Company number 66539) and is authorised and regulated by the Guernsey Financial Services Commission. Registration Number 2522730

THE AGREEMENT

Use of the website confirms your agreement to these Terms and Conditions. If you do not agree, please refrain from using our website. If you are unsure about any aspect of these Terms and Conditions, or have any questions regarding our relationship with you, please contact us.

YOUR RIGHTS

The Data Protection Act 2018 gives you rights, for example: You can access personal data we have about you by emailing conditions@Pedalsure.com. You'll need to pay a fee for this.

You can ask us in writing to stop or not start processing personal data if this is causing or likely to cause unwarranted substantial damage or distress (unless it is allowed for by the Data Protection Act 2018).

You can tell us not to use information about you for direct marketing. Direct marketing means any advertising or marketing material that's sent to you. You can opt out of our direct marketing during the application process and at any time afterwards. We'll continue to send you information as necessary to comply with legislation or regulations – for example, notice of our AGM, account statements, changes to account terms and conditions or interest rates and account maturity letters. You can write to us asking us to make sure that no decision we take (or that's taken on our behalf) which significantly affects you is based only on the automated processing of your information to evaluate, for example, your creditworthiness, reliability or conduct.

COOKIE POLICY

This section has been designed to help you understand how we use cookies and if you need to, how you can clear them from your computer.

HOW COOKIES HELP US

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.

HOW COOKIES HELP YOU

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.

HOW TO CLEAR YOUR COOKIES

You may refuse or disable the use of cookies 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.

IF YOU TURN OFF COOKIES

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.

PRIVACY STATEMENT & DATA PROTECTION

Before we provide any details to you, we will need to verify your identity. To provide the insurance product we need to collect and process personal information about you and disclose that information to a number of third-party service providers. All personal information will be held in strictest confidence and used only for the purposes for providing you the service requested, subject to certain exceptions as described below.

ASKING FOR CONSENT

- We have checked that consent is the most appropriate lawful basis for processing.
- We have made the request for consent prominent and separate from our terms and conditions.
- We ask people to positively opt in.
- We don't use pre-ticked boxes or any other type of default consent.
- We use clear, plain language that is easy to understand.
- We specify why we want the data and what we're going to do with it.
- We give separate distinct ('granular') options to consent separately to different purposes and types of processing.
- We name our organisation and any third-party controllers who will be relying on the consent. - Insurers

- We tell individuals they can withdraw their consent.
- We ensure that individuals can refuse to consent without detriment.
- We avoid making consent a precondition of a service. N/A if they don't you cannot offer the insurance
- If we offer online services directly to children, we only seek consent if we have age-verification measures (and parental-consent measures for younger children) in place.

RECORDING CONSENT

- We keep a record of when and how we got consent from the individual.
- We keep a record of exactly what they were told at the time.

MANAGING CONSENT

- We regularly review consents to check that the relationship, the processing and the purposes have not changed.
- We have processes in place to refresh consent at appropriate intervals, including any parental consents.
- We consider using privacy dashboards or other preference-management tools as a matter of good practice.
- We make it easy for individuals to withdraw their consent at any time and publicise how to do so.
- We act on withdrawals of consent as soon as we can.
- We don't penalise individuals who wish to withdraw consent.

You can update your preferences by calling, emailing or the Pedalsure Data Protection Network page accessed from our website footer.

GENERAL DATA PROTECTION REGULATION ENQUIRIES

Dukes House Insurance Limited is registered with the Information Commissioners Office under reference 61926 and takes all reasonable care to prevent any unauthorised access to your personal data. Under the terms of the Data Protection Act 2018, you have a number of rights. If you require a copy of the information, we hold about you please write to:

Dukes House Insurance Limited,
 PO Box 155,
 Mill Court,
 La Charroterie,
 St Peter Port,
 Guernsey,
 GY1 4ET

We are Dukes House Insurance Limited, referred to as "we/us/our" in this notice. Our data controller registration number issued by the Information Commissioner's Officer is 61926. This privacy notice is relevant to anyone who uses our services, including policyholders, prospective policyholders, and any other individuals insured under a policy. We refer to these individuals as "you/your" in this notice. We are dedicated to being transparent about what we do with the information that we collect about you. We process your personal data in accordance with the relevant data protection legislation.

WHY DO WE PROCESS YOUR DATA?

The provision of your personal data is necessary for us to administer your insurance policy and meet our contractual requirements under the policy. You do not have to provide us with your personal data, but we may not be able to proceed appropriately or handle any claims if you decide not to do so.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

Where you have purchased an insurance policy through one of our agents, you will be aware of the information that you gave to them when taking out the insurance. The agent will pass your information to us so that we can administer your insurance policy. For specific types of insurance policies, for example when offering you a travel insurance policy, we may process some special categories of your personal data, such as information about your health.

We collect this data as we are required to use this information as part of your insurance quotation or insurance policy with us. We may also process the data where it is necessary for a legal obligation, or as part of the establishment or defence of a legal claim. We also process special categories of your personal data as it is in the substantial public interest and it is necessary: i) for administering your insurance policy; or ii) to prevent and detect an unlawful act (e.g. fraud).

DUKES HOUSE INSURANCE LIMITED'S FULL PRIVACY NOTICE

This notice explains the most important aspects of how we use your data. You can get more information about this by writing to us at:

Data Protection
Dukes House Insurance Limited,
PO Box 155,
Mill Court,
La Charroterie,
St Peter Port,
Guernsey,
GY1 4ET

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.

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.

HOW WE USE YOUR PERSONAL DATA

Your personal information is required to generate the insurance quote and will be forwarded to the insurance provider and their agents, for example for the presentation of premium, or in the event of a claim. Except as set out in this Privacy Statement, 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.

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. You may change your preferences on our website at any time.

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, to quote for, source, place and administer your insurances to perform underwriting activities and to process claims.

Some examples follow:

- Insurers;
- Underwriters;
- Premium finance providers;
- Credit reference agencies;
- Debt recovery agencies;
- Claims handling companies;
- Loss adjusters;
- Insurance brokers;
- Reinsurers;
- Regulators.

We will collect your personal data when you visit our website, where we will collect your unique online electronic identifier; this is commonly known as an IP address. We will also collect electronic personal data when you first visit our website where we will place a small text file that is commonly known as a cookie on your computer. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using features. For more information please see our Cookie Policy.

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

MARKETING

You will receive an email from us containing the quote and also a reminder when your renewal is due. You cannot opt out of receiving these emails. We may from time to time contact you by email, post, or telephone when provided to tell you about promotions and news about Pedalsure. 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.

COMMUNICATION MONITORING

Monitoring or recording of all communications may take place in accordance with UK law, and in particular 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.

CREDIT AND OTHER SEARCHES

We may under take 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.

GENERAL DATA PROTECTION REGULATION RIGHTS

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data.

These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

- 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.

Individuals can exercise their Individual Rights at any time. 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.

In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for taxation, prevention of crime and for regulatory and other statutory purposes. You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

You can update your preferences by calling, emailing or the Pedalsure Data Protection Network page accessed from our website footer.

CONTACT DETAILS OF 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 - Independent Broking Solutions Limited
Unit 2 Kildegaard Business Park,
Easthorpe Road,
Easthorpe,
Colchester,
Essex
CO5 9HE

or (DPO Pedalsure) P Lochner - info@Pedalsure.com

GENERAL DATA PROTECTION REGULATION 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 relevant Data Protection Authority. Our Lead Authority within the European Union is the UK Information Commissioner's Office <https://ico.org.uk/concerns/>, live chat or by calling their helpline on 0303 123 1113.