

Privacy Notice

In accordance with the General Data Protection Regulation and related UK data protection legislation, we are committed to protecting the confidentiality and security of the information that you provide to us. This Privacy Notice is designed to help you understand how we collect and use your information. We may collect information from you about other people, for example, family members who may drive your car or who may be included on a travel or household insurance policy. If you give us information about another person it is your responsibility to ensure and confirm that:

- you have told the individual who we are and how we use personal information, as set out in this Privacy Policy; and
- you have permission from the individual to provide that personal information to us and for us to use it, as set out in this Privacy Notice.

If you have any questions or queries about this policy please contact us.

Who we are

"2Gether" (also referred to in this Notice as "we", "us", or "our") means 2Gether Insurance Ltd.

How to contact us:

For any questions or concerns relating to this Privacy Policy or our data protection practices, or to make a subject access or any other request regarding the information we hold, please contact us at:

2Gether Insurance Ltd
Exchange Square
Wisbech
Cambridgeshire
PE13 1RA

Tel: 01945 465508
Email: 2g.privacy@2gi.co.uk
Website: www.2getherinsurance.co.uk

Why we need and how we use your personal information

We only collect, use and store your information where we have lawful grounds and legitimate business reasons to do so.

We collect, use and store your personal information in order to fulfil requests for quotes, products and services as part our breakdown membership, claims handling and risk management businesses. It may also be used to verify your identity, to administer payments and to enable us to carry out anti-money laundering and other financial crime checks where required. If you pay by instalments your information may also be used to arrange credit.

The use of your data is essential for us to check your identity, to enable you to enter into a service contract and for the service to operate (in the event of a service request, for example). We may also use it keep our records up to date, to notify you about changes to our service and to help us in develop new products and services.

If you do not provide the information required we are unlikely to be able to arrange your membership and may not be able to provide certain services to you.

We may monitor calls, emails, text messages and other communications with you. When you contact us we may keep a record of that correspondence and any information provided to us during that or any subsequent communication.

Marketing

We would like to keep you updated about our relevant products and services by email, SMS and/or telephone. If we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes we will only do so with your consent. Your consent will be obtained specifically at the appropriate time. This does not apply to, however, motor vehicle insurance breakdown quotations, by where obtaining a quotation allows Us to confirm said quotation by email and for no other purpose.

If you have already consented and wish us to stop using your information for this purpose or any other purpose then please contact us.

Nature of personal information

Personal data is any information that may identify a living individual.

We collect personal information such as name, contact details, date of birth, gender, marital status, financial details, employment details and other personal details depending on the nature of the services we offer.

As a customer purchasing a motor breakdown product via our online portal, there is a question asking you, 'if you wish to inform us of anything further which would help assist us in your liaisons throughout your customer journey with us'. You are required to respond either yes or no to this question and whichever response you give does not impact on the cost nor the ease of you purchasing our products.

If you respond, 'yes' you will be asked to provide additional information which under UKGDPR is classed as 'special category data' and requires us to provide additional protection. By giving us this information, you are consenting to us sharing this information with the product underwriter and the recovery agents in event of a claim. You have the right to withdraw consent at any time.

The purpose of obtaining this data is for us, the product underwriter and the recover agents to be aware of personal circumstances that may require us to handle with sensitivity and extra consideration so that we provide good customer outcomes to you and we can assess that we are meeting our FCA regulatory obligations under Consumer Duty. If you require more information about our obligations, please contact 2g.privacy@2gi.co.uk

Sharing information

We will only supply your personal information to other parties where such a transfer is a necessary part of the activities that we undertake, where you give us consent or where we are required to do so by law or regulation (e.g. where the disclosure is necessary for the purposes of the prevention and/or detection of crime).

As a claims handler we may disclose personal information to insurance companies, underwriting agencies, business partners and other parties in order to provide our products and services. Examples of other parties include insurance intermediaries, loss adjusters, regulatory bodies, legal and accountancy firms involved in the claims handling process.

We may also disclose your information to service providers engaged to perform services on our behalf. Such service providers are contractually restricted from using or disclosing the information we give them except as necessary to perform services on our behalf or to comply with legal requirements.

We only share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We may also disclose personal information to new owners of our business in the event that we are subject to a merger or acquisition. Disclosure may also be made to enable company audits, regulatory inspections or to investigate a complaint, suspicion of fraud or a security threat.

We never share your information outside our organisation for marketing purposes.

You understand that we may disclose the information you provide to relevant other parties for the purposes described in this Notice.

Transfer of personal data outside the UK

Certain personal information held on our Information Technology systems may be transferred across geographical borders in accordance with applicable law.

By providing us with your information, you consent to the collection, international transfer, storage, and processing of your information. These transfers are governed by European Union (EU) standard contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

How long we keep information about you

We will keep your information for as long as it is required to enable us to provide quotations, administer your memberships, offer renewal and respond to any service requests or complaints (which may arise after the period of membership has expired). This will usually be a minimum period of seven years or otherwise as determined by law or regulation. Once we decide that we no longer need your information it will be securely and confidentially destroyed.

Your data protection rights

You have certain legal rights under UK data protection law and regulations, summarised as follows:

- **The right to be informed** about our data processing activities, including through Privacy Notices such as this.
- **The right of access** to the personal information we hold about you. To request a copy of this information you must make a subject access request in writing to us.
- **The right of rectification.** You may ask us to correct any inaccurate or incomplete data within one month.
- **The right to erasure and to restrict processing.** You have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide products and services.
- **The right to data portability.** On your request, we will provide you with your personal data in a structured format.
- **The right to object.** You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing or research purposes.

If you want to invoke any of these rights please write to us:

2gether Insurance Ltd, Exchange Square, Wisbech, Cambridgeshire, PE13 1RA
or email: 2g.privacy@2getherinsurance.co.uk

Withdrawal of consent

Where you have provided your specific consent to the use of personal data, you may withdraw that consent by contacting us:

2Gether Insurance Ltd
Exchange Square
Wisbech
Cambridgeshire
PE13 1RA

Tel: 01945 465508
Email: 2g.privacy@2getherinsurance.co.uk

How to make a complaint

If you wish to make a complaint about how we hold or use your data, please contact us:

2Gether Insurance Ltd
Exchange Square
Wisbech
Cambridgeshire
PE13 1RA

Tel: 01945 465508
Email: 2g.privacy@2getherinsurance.co.uk

If you are dissatisfied with how we deal with your complaint, you may contact the Information Commissioner's Office:

The Information Commissioner,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Tel: 08456 30 60 60
Website: www.ico.gov.uk

Information from other sources

We may use legal public sources such as the electoral roll and other third party sources such as credit reference agencies to obtain information about you, for example to verify your identity or check your credit history.

We also obtain information about you from credit reference agencies and similar third parties. Some personal information may be provided to us by third parties such as insurance companies, other insurance intermediaries and motor vehicle licensing authorities. In some cases you will have previously submitted your personal information to them and given them approval to pass this information on for certain purposes.

Such information will only be obtained from reputable sources which operate in accordance with the General Data Protection Regulation.

We and/or other parties may use your information for purposes such as statistical and trend research and analysis which may include computerised processes which profile you. Automatic profiling helps us understand, predict and forecast customer preferences and to improve the products and services we offer and to assess which products might be most suitable for you.

We may amend this Privacy Policy from time to time for example, to keep it up to date or to comply with legal requirements. The latest version of this policy can be found at www.2getherinsurance.co.uk