

## 1 Who we are and our approach to privacy

In this Privacy Policy when we say 'Dayinsure', 'we', 'us' or 'our', we mean Dayinsure.com Limited, an insurance intermediary providing short-term and learner car insurance. We are a subsidiary of Ormiston Holdco Ltd and part of the Abacai Group ("The Group").

The security and privacy of your personal information is very important to us. We want to assure you it will be properly managed and protected while in our hands. This Privacy Policy explains how, why and when we use your personal information.

We are a data controller. This means we decide the purpose for which we use your personal information and how it is used. We have partnerships with a number of insurers and other introducers.

When you take out an insurance policy, a third-party insurer or 'underwriter' will also be a data controller.

When a third party is a data controller, we strongly recommend you review their privacy policy so you can understand how they will collect, store, use and share your information.

We have appointed a Data Protection Officer who is responsible for the way we handle personal data. If you wish to know more or get in touch, you can do so by using the details in the "How to contact us about your requests or concerns" section below.

## 2 What personal information do we collect and from where?

To provide you with our services, we collect, process and hold only the personal data we need.

What information we collect about you will depend on the service involved and your personal circumstances, but includes:

- basic personal information including name, address, contact details and date of birth
- information about your work or profession
- your nationality
- details of the products you hold with us and how you use them
- financial information such as credit/debit card details and details of payments you have made to us
- information on claims you have made
- personal information gathered when you've applied for a product, including if we declined an application
- information about how you interact with us, our website and our services (e.g. Dayinsure Mobile apps)
- medical information, criminal offences and other such sensitive information\*
- accessibility details if we need to make reasonable adjustments to help
- government identifiers such as driving licence number, passport numbers
- machine identifiers including your IP address
- information about others regarding registered car ownership
- information on the vehicle you are seeking to insure, some of which we'll collect from external databases.

\*This could include highly sensitive information also known as 'special category' personal data or criminal-offence information. We always minimise the use of such data. We'll only use your more sensitive types of data when absolutely necessary.

Our website may include links to and from the websites of our partner networks, advertisers, and affiliates, or to social-media platforms. If you follow a link to any of these websites, please note they have their own privacy policies and we do not accept any responsibility or liability for them. You should check how an organisation processes data before you submit any personal data to its website.

We collect information about:

- previous, current and prospective customers/policyholders
- previous, current and prospective parties covered under an insurance policy we arrange
- people authorised to speak to us on behalf of a customer or policyholder
- users of our websites.

If you provide personal information to us about other individuals, you should:

- make sure you only share an individual's personal information with us if you have their permission to do so
- share this Privacy Policy with all individuals whose information you give us.

We may obtain personal information in various ways:

- From you or someone connected to you.\*
- Companies and organisations that introduce you to us.
- Comparison websites.
- From third-party databases used by the insurance industry (e.g. DVLA, Motor Insurers' Bureau, Claims Underwriting Exchange).
- Credit-reference agencies.
- Government bodies and agencies.
- Law-enforcement agencies.
- Fraud-prevention agencies.
- Insurers and insurance underwriters (claims information).
- The electoral roll and other sources of publicly available information.\*\*
- Our service providers.
- Market-research providers.
- Organisations providing data services to support us in managing our relationship with you and operating our business.
- From other companies in the Abacai Group.
- Social media (if you have made information publicly available).

\*If someone acting on your behalf gives us information, we'll always record who gave it and what it said.

\*\*Our product and application contains public-sector information licensed under the Open Government Licence v3.0. For further information about the full terms of the Open Government Licence, please refer to URL: <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

### 3 Why do we collect personal information and how is it used?

We collect and use your information so we can arrange and administer your general insurance products and to operate our business. We only collect personal information that is necessary. We'll only use that information when it is appropriate to do so.

UK data protection law requires that we have a reason to process your personal information. The most likely reasons for us to collect and use personal information are as follows.

#### **Providing services that relate to a quote and/or insurance policy as part of a contractual relationship, including:**

- applying for and arranging insurance
- referring to relevant databases to verify information provided
- evaluating your application and ability to pay for your policy by instalments. This may involve sharing your personal information with credit-reference agencies. (See section "our use of credit reference agencies" for more detail.)
- ongoing management of your policy including amendment, claims, complaints and notifying you of changes to your policy
- providing you with the services we have committed to in your policy documents, and allowing you to participate in interactive features of our services/websites. This may include the transfer of your information to third parties, if this is necessary to provide a service or product feature.

#### **Making automated decisions:**

When we assess an application we use computer systems to make what are known as 'automated decisions'. You can find more information on this below in the section "When do we use your personal information to make automated decisions about you?". We need to use your personal information to assess your application, give you a quote and offer you insurance. Without it, we'll be unable to provide you with cover.

**If our business interests mean it is reasonable and justifiable for us to do so (known as a legitimate interest), including:**

- collecting information about you from databases as described in this notice and verifying information you provide against them
- strictly necessary website cookies such as those that allow you to navigate and use essential website features, or for website maintenance and improvement. More information can be found in our [Cookie Policy](#)
- giving you a quote
- sharing information with other firms, industry and public bodies necessary to the conduct of our business
- recovering payments due to us
- data analysis to support, review and improve our products and services
- for development of our business operations, including for troubleshooting, data analysis, testing, research, statistical and survey purposes
- audit and quality control to improve our customer service and training and to run our business well. This includes call recording or monitoring. It may include the use of voice analytics.

**If we have your permission to do so, for example:**

- to give you information about products or services we feel may interest you (see our section on Marketing for more information)
- where personal information is supplied by an individual who holds no contractual relationship with us but gives us permission to collect, store and use their personal data (e.g., a learner driver's parent or guardian)
- the collection, storage and use of children's personal information if this is necessary for the work being done (e.g., for learner drivers under the age of 18)
- if you have given your consent to our use of certain types of optional website cookies, such as those that personalise your repeat visits to our websites or allow third parties to conduct web analytics. More information can be found in our [Cookie Policy](#).

**If there is a legal requirement to share personal information:**

- To assist with preventing, detecting or investigating criminal offences (e.g. fraud, money laundering or organised crime). This includes sharing information in line with a legitimate request from a UK law-enforcement agency.

This is our approach to using particularly sensitive types of personal information such as criminal offence and special category information):

- When we collect, store and use certain types of sensitive information such as special category (e.g. health or medical records) or criminal offence data, data protection law includes additional safeguards.
- When we use personal information that relates to a criminal offence, we'll usually do so for an insurance purpose.
- Similarly, if we have cause to use your special category information, we'll normally do so with an extra justification. This will usually be when:
  - the processing is necessary to establish, exercise or defend legal claims, or
  - there is a substantial public interest in processing it for insurance purposes (i.e., the processing is a requirement which contributes to the wider public benefit that results from the UK insurance industry).

We'll always minimise the use of this type of information.

## 4 Who we share your personal information with and why

We take the privacy and security of personal data very seriously. We'll only ever share your personal data in ways consistent with UK data protection law. To give you peace of mind, Dayinsure will never sell your data.

As part of operating our business, we may share your personal data with the following:

- Other brands or companies in the Abacai Group of companies (see the About Us section of our website for more information).

- Other insurers, partners, agents or carefully selected third parties – this is usually when we use a third party to fulfil a service to you on our behalf (e.g., breakdown cover) or when a third party is giving us a service (e.g., professional advisers such as legal firms).
- Third parties that we use to help us identify and maintain accurate information, detect financial crime, detect fraud, update us on UK sanctions, or help with investigation in cases of suspected fraud.
- Companies we partner with to provide you with insurance (e.g., introducers, insurance underwriters). You will be notified who your insurer is both when you take out a policy and in your policy documents. We strongly recommend you also review your underwriter's privacy policy so you understand how they will collect, store and use your information.
- We share information with credit reference agencies to assess your credit history. You can find more information on this in our use of credit reference agencies section.
- Statutory, regulatory, supervisory or otherwise authorised public bodies to provide necessary information (such as the Financial Conduct Authority and the Information Commissioner's Office).
- Organisations to which we have a duty to disclose your personal information under applicable law (e.g., a UK police force or court).
- Insurance industry bodies such as the Motor Insurers' Bureau (MIB) and the Association of British Insurers (ABI).
- Third parties with whom you have given us permission to share your information, and it is reasonable for us to believe they are acting on your behalf or when you have agreed to benefit from an offer of service they fulfil (e.g., promotions associated with a purchase).
- We may pass information to third parties to fulfil marketing communications. We'll only do this if we have appropriate permission to do so. More information on this is available in our section on Marketing.
- Another company, where part or all of our business is being sold to them. To ensure cover continues uninterrupted and, as part of any potential sale, we may share personal information with the purchasing party. Any prospective purchaser would be under a strict duty of confidentiality that covers all personal information we share with them.
- Transfer of your information after sale of your policy to another insurer. If this happens, we would specifically notify you of this. You will be able to exercise your right to object (see the your information rights section for more details on this right).
- Piloting improved systems and services. Third parties may help with this.

## 5 Will we transfer your personal information overseas?

UK data law includes standards of data protection designed to keep your personal information safe.

We always seek to keep your personal information within the UK. If we do need to transfer, store or use personal information we hold outside the UK, we will either confirm that the location your information is being processed is one that the UK Government has decided equates to the UK's own standards (known as 'adequacy'), or we will put in place additional protections to make sure it remains suitably secure and compliant with UK law.

This means your information should keep a similar level of protection at all times.

Please contact us if you want further information on the countries to which we may transfer personal data and the specific mechanism we use when transferring your personal data outside the UK.

## 6 How long will we keep your personal information for?

We only keep your personal information for as long as is necessary, as set out in this Privacy Policy and to meet our legal, regulatory and contractual obligations.

We have in place a Data Retention Policy that governs how long we should keep different types of personal information. We regularly review the policy to ensure it follows current legal and regulatory requirements.

It is important that you are aware that retention periods vary depending on the circumstances of an individual matter, but in general our retention periods for customer-facing documents are as follows:

Information type	Retention period
Quotation only (no insurance policy purchased)	3 years
Purchased policy Information	7 years
Information about claims	7 years (longer in exceptional circumstances)
Customer account Information	1 year (after last consent was obtained)

## 7 Marketing (communications promoting products and services)

We may, along with our trusted partners (Aviva and companies in the Abacai Group), we may provide you with marketing offers on products and services. When we do so, we'll always give you the opportunity to opt out of direct marketing when you request an online quote, buy a product online or receive any email, text or other direct marketing communication.

In addition, you can always ask us to stop contacting you about products and services directly. You can do this:

- by getting in touch through the channels identified in your product documents, or
- by using our contact details in the "How to contact us about your requests or concerns" section of this Privacy Policy.

Although requesting this will mean we stop all communications promoting products or services, we will of course continue to send you service-related communications when necessary.

## 8 When do we use your personal information to make automated decisions about you?

We use computers to make automated decisions about you, meaning that some decisions are not made by our employees. This is known as 'automated decision-making'.

When we assess your insurance application, we'll use an automated decision to apply our pricing and business-acceptance rules. This will decide whether we can provide a quotation and, if so, at what price. We'll use the information you give us about yourself and about other relevant individuals to make this decision.

As part of our assessment, we'll use information sourced from third-party companies such as credit reference agencies. This assessment will involve driving-licence checks and the review of relevant information including verification of residence at the address provided, historic payment behaviour on financial products, prior insolvency and any relevant county court judgements. For more information, please see section in this notice on Our Use of Credit Reference Agencies.

You have a right to not be subjected to automated decision-making without human intervention. However, you should be aware that some of the automated decisions we make are needed to give you an insurance quotation. Objecting to their use may result in us being unable to offer you a policy. For more information on your right to human intervention, please see section on Your Information Rights.

## 9 Our use of credit reference agencies

To assess applications and amendments, we make checks with credit reference agencies. We'll share with them the personal information you have given us so they can provide us with information about you relevant to your application. This is what is commonly called a 'credit check'.

Dayinsure only performs a soft credit search, which may be recorded on your personal credit report so that there is a transparent record of which companies have been viewing your credit history. This type of search does not affect your ability to apply for credit. You can get a copy of your credit report at any time from a credit referencing company. Please note: not every soft credit search will result in a visible 'footprint' being left on your report.

For further information about the ways credit reference agencies use and share personal information, go to <https://www.experian.co.uk/legal/crain/>



## 10 Your information rights

You have a number of rights when it comes to your personal information. We want to make it as easy as possible for you to understand what these rights are:

Right to access	Right to rectify*	Right to erase*
You have the right to request a copy of the information we hold about you. This is usually free of charge and is called a data subject access request.	If you believe that any personal information held about you is incorrect or incomplete, you have the right to ask us to correct it.	In certain situations, you have the right to ask us to delete personal information we hold about you.
Right to restrict*	Right to object*	Right to data portability
You have the right to restrict us from processing your personal information any further or from deleting it.	You have the right to ask us to stop processing your personal information – for example, when we're using it for direct marketing or if you believe our processing of your information is causing you harm.	In limited circumstances, you have the right to request us to transmit your data directly to another organisation. We review all such requests on a case-by-case basis to see if they are feasible.
Right to human intervention	Right to withdraw consent	Right to complain
You have the right to request that a fully automated decision that used your personal information is reviewed by a person employed by Dayinsure.	<p>You have the right to withdraw your consent to Dayinsure processing your information. Please note this can result in your policy being cancelled.</p> <p>Withdrawing your consent does not affect any use we have made of the information before this date.</p>	<p>You have a right to complain to the Information Commissioner's Office (ICO) if you feel there is a problem with the way Dayinsure is handling your data.</p> <p>The ICO will usually ask you to try to resolve your concerns with us directly before you refer your complaint to them.</p>

\*Whether or not we meet a rights request depends on us balancing your request against other factors such as legal and regulatory requirements, the purpose of a contract between us and you, or if there is a compelling legitimate ground not to. However, if we are not going to meet your request in part or in full, we'll always inform you of our decision to not do so.

If you wish to make a data rights request, please email [support@dayinsure.com](mailto:support@dayinsure.com). We'll acknowledge your request and prepare a response within one month.

More information on the ICO's approach to complaints can be found at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns). Making a complaint does not affect your other legal rights or remedies.

## 11 How to contact us about your requests or concerns

If you wish to exercise an information right or have a complaint about how we gather, keep or use your information, you can contact us:

### By post

Dayinsure. Com Ltd  
Mara House  
Nantwich Road  
Tarporey  
CW6 9UY

ICO-registered Data Protection Officer  
Alexander Peters

Email – [support@dayinsure.com](mailto:support@dayinsure.com)  
Tel. – 0333 005 0944\*

### \*Important information

For our joint protection, telephone calls may be recorded and/or monitored and will be saved for at least five years. Calls to 0800 numbers from UK landlines and mobiles are free. The cost of calls to 03 prefixed numbers are charged at national call rates (charges may vary, depending on your network provider). They are usually included in inclusive minute plans from landlines and mobiles.

## 12 Privacy notice updates

We may amend this Privacy Policy from time to time to reflect important changes that affect how we collect, keep or use personal information. Updates will usually be in response to changes in the way data protection law is written or applied.

You should check our website periodically to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: 19/07/2023