

## Privacy Policy

Protecting your personal information is extremely important to us at Lifetime Pet Cover. We understand that you trust us to look after your personal data hence the way we collect, use, store, share and retain your personal information is of great importance.

This privacy statement sets out how we, Lifetime Pet Cover (LPC) will use personal information we collect about you when you obtain a quote or buy a policy from us over the phone, via our website or by email.

Lifetime Pet Cover and Trent Services Administration Ltd. will be the data controllers of your data for the purposes of the Data Protection Act 1998 and the EU General Data Protection Regulation (GDPR).

### 1. What is your personal information?

Personal information is any information about a living individual that can be used to identify them. For example: names, addresses, e-mail addresses, telephone numbers, bank details etc. Such details could relate to customers, employees, shareholders, vendors, suppliers, business contacts etc.

### 2. What material do we collect?

We may collect and process the following personal information about you:

Type of data	Description	Examples of how we use it
<b>Contact</b>	<ul style="list-style-type: none"> <li>Who you are</li> <li>Where you live (including previous addresses)</li> <li>How to contact you</li> <li>Third party contacts (e.g. family members or friends)</li> </ul>	<ul style="list-style-type: none"> <li>Servicing your product</li> <li>Marketing</li> <li>Analysis &amp; profiling</li> <li>Enhancing our product and service offering</li> <li>Product underwriting and pricing</li> </ul>
<b>Personal details</b>	<ul style="list-style-type: none"> <li>Age</li> <li>Gender</li> <li>Family details</li> <li>Visual images &amp; personal appearance</li> <li>Financial Details</li> <li>Lifestyle and social circumstances</li> <li>Health details</li> <li>Employment Details</li> </ul>	<ul style="list-style-type: none"> <li>Marketing</li> <li>Analysis &amp; profiling</li> <li>Product underwriting and pricing</li> </ul>
<b>Transactional</b>	<ul style="list-style-type: none"> <li>Bank and/or card details</li> <li>How you use your product</li> <li>Changes you make to your product or account</li> </ul>	<ul style="list-style-type: none"> <li>Servicing your product</li> <li>Making sure our products and services are fit for purpose</li> </ul>
<b>Contractual</b>	<ul style="list-style-type: none"> <li>Your claims history</li> </ul>	<ul style="list-style-type: none"> <li>Product renewal underwriting and pricing</li> <li>Making sure the product is right for you</li> </ul>
<b>Consent &amp; preferences</b>	<ul style="list-style-type: none"> <li>Ways you want us to market to you</li> <li>To obtain information from third parties on your behalf</li> </ul>	<ul style="list-style-type: none"> <li>Marketing</li> </ul>
<b>Technical</b>	<ul style="list-style-type: none"> <li>Details on the devices and technology you use</li> </ul>	<ul style="list-style-type: none"> <li>Making sure our products and services are fit for purpose</li> </ul>

### 3. Where do we collect your personal information from?

- Directly from you - information you provide when you fill in forms or contact us by phone, e-mail, or on our web platforms etc.** We may record phone calls for our mutual protection and to improve our customer service standards.

Please refer to our cookie policy on our website for more information on how we use cookies.

- Information we collect about you or receive from other sources.** This could be information you provide to us electronically (through our website for example), information we get from your online browsing activity, information from a third party (e.g. price comparison sites), if you have obtained a quotation for a policy with us. The information you provide is shared with us and used for the purposes set out



below. The information in this notice will apply in addition to any information given to you by that price comparison website about the use of your personal information) or from publicly available sources such as social media platforms or the electoral register (e.g. to detect fraudulent claims).

- Please refer to our cookie policy for more information on how we use cookies

#### 4. How will we use the information we have collected from the above sources?

Premium received from you will be held by us as Agent of the Insurer and the Bank account is designated as per the relevant regulatory rules.

- A. To provide you services relating to an insurance quotation and/or insurance policy:

We collect and use personal information to allow us to give you a quote or to process your purchase of a policy. We also use your information in dealing with renewals and to improve our understanding of our products and services and of your interests. We will use it to manage your insurance policy, including claims handling, issuing policy documentation to you, and providing you with the services described in your policy documents.

- B. To communicate with you:

We may send you communications from Lifetime Pet Cover which may include the following:

If you have a current policy with us:

- Providing you with services as per your policy (Email/Post/Phone)
- Reminders when your policy may be due for renewal (Post/Email)
- Further information about the services we offer (Email)
- Newsletters (Email)
- New product launches (Email)
- If you have taken part in a competition/ reward scheme with us (Phone/Email)

If you have obtained a quote with us:

- Confirming/sending a copy of your quote (Email)

- C. To provide you services relating to an insurance quotation and/or insurance policy:

We collect and use personal information to allow us to give you a quote or to process your purchase of a policy. We also use your information in dealing with renewals and to improve our understanding of our products and services and of your interests. We will use it to manage your insurance policy, including claims handling, issuing policy documentation to you, and providing you with the services described in your policy documents.

#### 5. Using your information in accordance with data protection laws

Data protection laws require us to meet certain conditions before we're allowed to use your personal information in the way described in this privacy policy. We take these responsibilities extremely seriously.

To use your personal information, we'll rely on the following conditions, depending on the activities we're carrying out:

- Providing our contracts & services to you: We'll process your personal information to carry out our responsibilities resulting from any agreements you've entered into with us and to provide you with the information, products and services you've asked from us, which may include online services.
- Complying with applicable laws: We may process your personal information to comply with any legal obligation we're subject to.
- Legitimate interests: To use your personal data for any other purpose described in this privacy policy, we'll rely on a condition known as "legitimate interests". It's in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. We may use your information to:
  - Carry out market research and product development, which can include creating customer demographics and/or profiling.
  - Send marketing information.
  - Develop and test the effectiveness of marketing activities.
  - Develop, test and manage our brands, products and services.
  - Study and also manage how our customers use products and services from us and our business partners, including customer surveys.
  - Manage risk for us and our customers.



This requires us to carry out an assessment of our interests in using your personal data against the interests you have as a citizen and the rights you have under data protection laws.

The outcome of this assessment will determine whether we can use your personal data in the ways described in this privacy policy (except in relation to marketing, where we'll always rely on your consent). We'll always act reasonably and give full and proper consideration to your interests in carrying out this assessment.

- **Consent:** We may provide you with marketing information about our services or products where you've provided your consent for us to do so. You may opt out of marketing at any time by e-mailing or telephoning your customer servicing team.
- **Special category (sensitive) data:** Where you have consented, we will process any medical & health, racial & ethnic origin, genetic & biometric or sex life & sexual orientation information you have provided, and any other sensitive information obtained from a third party (e.g. your vet or other medical professional), solely for the purposes of allowing us to underwrite and administer your product, provide other services (e.g. financial advice) and deal with claims. Alternatively, we may process special category data for reasons of substantial public interest in accordance with applicable law. We will only process data that is needed for specific purposes.

Please be aware that the personal information you provide to us, and which we collect about you, is required for us to be able to provide our services to you and without it we may not be able to do so.

## 6. How long do we keep your information for?

We'll keep your personal information in accordance with our internal retention policies. We'll determine the length of time we keep it for based on the minimum retention periods required by law or regulation. We'll only keep your personal information after this period if there's a legitimate and provable business reason to do so.

For certain research and statistical activities, we may indefinitely retain minimised personal information about you, including medical information, to solely to define our actuarial, underwriting and pricing risk strategies. These activities will not be used to make a decision, or take measures, against you.

## 7. Who do we share your personal information with?

We'll only disclose your information to the following third parties for the purposes listed under section 4 above "How will we use the information":

- **BMG Insurance Brokers Limited:** We will share your data with BMG Insurance Brokers Limited as part of our regulatory reporting requirements
- **Trent Services Administration:** We will share your data with Trent Services Administration if you:
  - Call us to change your address
  - Call us to make new claims or find out the status of your claims. Trent Services Administration may in turn pass your data to other platforms for processing your claims, but this will be explained to you in your renewal notice or when you take out a policy with us.
- **Bastion Insurance Company Limited & Ageas Insurance Limited:** As our underwriters, your policies will be underwritten by them and claims accruing from your policies will be handled by Trent Services Administration.
- **Premium Credit Limited:** If you choose to finance your insurance premium by instalments, we will share your personal data with Premium Credit Limited, a third-party credit provider, in order to enable them to prepare relevant credit agreements, carry out credit checks (as required by law) and to generally provide you with credit services. Premium Credit Limited can be contacted at [www.premiumcredit.com](http://www.premiumcredit.com). Where your personal information is shared with Premium Credit Limited, you will receive a copy of Premium Credit Limited (as a separate data controller)'s data privacy notice. Where you previously financed your insurance premium by instalments with Trent Services Administration, the personal data provided to Premium Credit Limited may include details of any existing direct debit mandate you provided so that this may be updated for your new finance arrangement with Premium Credit Limited.
- Selected third parties, so that they can contact you with details of the services that they provide, where you have expressly opted-in or consented to the disclosure of your personal data for these purposes.
- Our regulators, government agencies (e.g. HMRC), law enforcement agencies, credit reference agencies, fraud prevention agencies, as well as our professional advisers etc.
- We may share data (including electronic identifiers such as IP addresses) with the police and fraud prevention agencies if we believe that it is reasonably required for the prevention or detection of crime or fraud or to protect our customers. Data may also be released to third parties if we are required to do so under the terms of a court order.
- Additionally, we may disclose your personal information to third parties:
  - In the event that we sell or buy any business or assets, in which case we'll disclose your personal data to the prospective seller or buyer of such business or assets.
  - If we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.



- In order to enforce or apply the terms of any contract with you.
- If we're under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.
- To protect you and Lifetime Pet Cover from financial crime, we may be required to verify the identity of new and sometimes existing customers. This may be achieved by using credit reference agencies to search sources of information relating to you (an identity search). This will not affect your credit rating. If this fails, we may need to approach you to obtain documentary evidence of identity.
- If you make a claim, we'll share your information (where necessary) with other insurance companies to prevent fraudulent claims.

If you've been introduced to us by another company (e.g. Price Comparison sites), we may share your information with them to enable them to:

- Assist you with your application process (aggregator and price comparison websites only).

## 8. Other partner/affiliate websites

We are not responsible for the privacy policies and practices of other websites. Whenever possible we will only partner with other websites which maintain the same standards as are present on our own website but we cannot guarantee this. If you click through to any of our product or service providers to their own website, you will be subject to that product or service provider's website terms and conditions and privacy policy, which we would recommend you read carefully.

## 9. Your rights

You have rights under data protection law that relate to the way we process your personal data. More information on these rights can be found on the Information Commissioner's website. If you wish to exercise any of these rights, please get in touch with your customer services team. Alternatively, you can also use the Contact Us section of our website.

- A. The right to access the personal data that we hold about you.
- B. The right to make us correct any inaccurate personal data we hold about you.
- C. The right to make us erase any personal data we hold about you. This right will only apply where for example:
  - We no longer need to use the personal data to achieve the purpose we collected it for
  - You withdraw your consent if we're using your personal data based on that consent
  - Where you object to the way we use your data, and there is no overriding legitimate interest.
- D. The right to restrict our processing of the personal data we hold about you. This right will only apply where for example:
  - You dispute the accuracy of the personal data we hold
  - You would like your data erased, but we require to hold it in order to stop its processing
  - You have the right to require us to erase the personal data but would prefer that our processing is restricted instead
  - Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
- E. The right to object to our processing of personal data we hold about you (including for the purposes of sending marketing materials to you).
- F. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to make us transfer this personal data to another organisation.
- G. The right to withdraw your consent, where we're relying on it to use your personal data (for example, to provide you with marketing information about our services or products).
- H. For automated decisions (including profiling), you have right to:
  - Obtain an explanation of the decision and challenge it
  - Request for the decision to be reviewed by a human being

## 10. Contacts and complaints

If you have any questions about this privacy policy or wish to exercise any of your rights, including changing your marketing preferences, please get in touch with our customer services team. Alternatively, you can also use the Contact Us section of our website.

If you have any concerns about the way we process your personal data, or are not happy with the way we've handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:



First Contact Team  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

## 11. Data Protection Officer

Lifetime Pet Cover has appointed the following officer as the Data Protection Officer to monitor compliance with data protection laws:

**Name:** Matthew Harrison

**E-mail address:** [dpo@lifetimepetcover.co.uk](mailto:dpo@lifetimepetcover.co.uk)

**Address:** The Old Dairy, Western Court, Bishop's Sutton, Alresford, SO24 0AA

## 12. Changes to our privacy policy

We reserve the right to amend or modify this privacy policy at any time and any changes will be published on this website.

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 02/02/2023.

