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## PRIVACY POLICY

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### Background

This document explains how we collect, use and store **your personal information** and, potentially, the information of anybody named on **your** quote, policy or claim. If **you** would like a printed copy or for this document to be provided in an alternative format (e.g. Braille, large print, audio file) please contact us.

We understand that **your** privacy is important to **you** and want **you** to be confident about how we use **your** personal information, but to also be aware of **your** rights in this regard. We respect and value the privacy of all our customers and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and **your** rights under the law.

Please read this Privacy Policy carefully and ensure that **you** understand it. If **you** have any questions, please contact us using the details in the 'Who we are and how to contact us' section.

### Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

<b>"Cookie"</b>	means a small text file placed on <b>your</b> computer or device by our websites when <b>you</b> visit certain parts of our websites and/or when <b>you</b> use certain features of our website. Details of the Cookies used by our website are set out in our 'Cookie Policy';
<b>Data Controller</b>	means the person or entity which alone or jointly with others determines the purposes and means of the processing of personal data;
<b>Data Protection Law</b>	means the General Data Protection Regulations ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then any successor legislation to the GDPR or the Data Protection Act;
<b>"personal information"</b>	means any and all information that relates to an identifiable person who can be directly or indirectly identified from that information. In this case, it means personal data that <b>you</b> give to us directly or provide / agree to provide via our websites. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 - the General Data Protection Regulation ("GDPR");
<b>"You/Your"</b>	means anyone whose <b>personal information</b> we may collect including: <ul style="list-style-type: none"> <li>- anyone seeking to obtain a quote from us and anyone named during this process</li> <li>- policy holders and anyone they might authorise to discuss the policy and / or act on their behalf regarding the policy and any resulting claims</li> <li>- anyone who might benefit from the policy or become involved in the event of a claim, including third party claimants and witnesses.</li> </ul>

## Who we are and how to contact us

The Data Controller of **your personal information** is TVIS Limited trading as 'Vetsure', a limited company registered in England under company number 06820979, whose registered and main trading address is 1st Floor, Helios Court, 1 Bishop Square, Hatfield, Hertfordshire AL10 9NE. TVIS Limited is regulated by the Financial Conduct Authority (FCA no.523215) and is a member of the Financial Services Compensation Scheme (FSCS). TVIS Limited is registered as Data Controller with the Information Commissioners Office (ICO registration no. Z2761214).

You can contact Vetsure's GDPR Contact by email at [info@vetsure.com](mailto:info@vetsure.com) or by post at Data Protection, Vetsure, 1st Floor, Helios Court, 1 Bishop Square, Hatfield, Hertfordshire AL10 9NE.

When you take out a policy the Data Controller of your personal information is also Atlas Insurance PCC Limited ("Atlas") in respect of its TVIS Cell, a protected cell of Atlas. The registered office is situated at 48-50 Ta'Xbiex Seafront, Ta'Xbiex XBX1021, Malta and is registered in Malta under company registration number C 5601.

You can contact Atlas' GDPR Contact by email at [dpo@atlas.com.mt](mailto:dpo@atlas.com.mt) or by post at Data Protection, Atlas Insurance PCC Limited, 48-50 Ta' Xbiex Seafront, Ta' Xbiex XBX 1021 Malta.

## What information do we collect?

We only ask for information that we need and have strict controls in place to keep it safe. We collect **your personal information** in order to provide our products and services to **you**. Without the information we request, we can't give **you** a quote or insurance policy and it could affect the outcome of any claims **you** may make.

**Personal information** we collect may be held in paper or digital form.

We may collect some or all of the following personal and non-personal data (please also see our **Cookie Policy** for details regarding the use of **Cookies** and similar technologies):

- basic personal details including **your** name, date of birth, address;
- **your** payment details such as direct debit or payment card details;
- contact information such as email addresses and telephone numbers;
- information about **your** pet(s) including details of their medical history;
- details of any accessibility requirements so that we may make reasonable adjustments to help **you**;
- when **you** use our websites\*: we may collect a list of URLs starting with a referring site, **your** activity on our website, and the site **you** exit to.

We may request this information when **you**:

- ask for a quote and / or apply for a policy;
- buy a policy;
- ask us a question and we provide a response;
- wish to inform us about a claim or potential claim;
- make a payment;
- update **your** details and / or cover level;
- register a complaint;
- take part in market research;

- update **your** preferences in regard to marketing.

\*Our websites are:

- <https://www.vetsure.com/>

- <https://insurance.vetsure.com>

Please note - This Privacy Policy applies only to **your** use of these websites. These may contain links to other external websites. Please note that we have no control over how **your** data is collected, stored, or used by these other websites and we advise **you** to check the privacy policies of any such websites before providing any data to them.

### Authorising someone to talk to us about or act on your policy

We will only speak to someone else about **your** policy, and / or take any action on **your** policy based on their instructions, once we are satisfied that **you** have authorised them to do so.

### How do we use and share your personal information?

All personal data is processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected. We will comply with our obligations and safeguard **your** rights under the GDPR at all times.

Our use of **your** personal data will always have a lawful basis, either because it is necessary for our performance of a contract with **you**, because **you** have consented to our use of **your** personal data (e.g. by subscribing to emails), or because it is in our legitimate interests\*. As a regulated financial services organisation, we're required to comply with legal and regulatory obligations such as the prevention, detection and reporting of fraud and other financial crime. Specifically, we may use **your** data for the following purposes (our legal basis for processing personal information):

- develop, improve, and personalise our products, pricing and services;
- enhance our customer service, experience, and relationship (e.g. customer and market research, business analysis, provide relevant product and service information);
- improve the relevance of our advertising and marketing campaigns;
- help detect and prevent fraud and financial crime. If this is detected, **you** could be refused certain services, finance or employment. Where we suspect financial crime or fraud has taken place we may cancel **your** policy and may not be able to pay any claim. We may share relevant information with crime and fraud prevention agencies, law enforcement agencies and other relevant organisations;
- develop and improve our administration, security systems and insurance applications;
- share it with third parties in the event of organisational change (e.g. if we bought or merged with another organisation);
- to provide quotes, administer policies including the administration of claims to fulfil our contract with **you**. This includes sharing information with, and obtaining information from, relevant service providers such as Veterinary Practices and other animal healthcare providers as relevant to **your** claims. We'll also collect any other information from other parties as required in order to process claims e.g. from third party claimants, witnesses, police;
- if **your** veterinary practice is part of our accredited network\*\*, and **your** policy is associated with this practice, the following will be made available to them via a secure online portal on a real-time basis:

- basic details of any products **you** hold or have previously held with us – including whether **your** policy is in financial arrears;
- ability to submit a lead enquiry to us with **your** permission;
- establish the status of any lead enquiry that the veterinary practice, with **your** permission, submits on **your** behalf;
- ability to submit a claim, request a claim pre-authorisation and / or submit and redeem Preventative Care Vouchers where applicable;
- the summary status of any claims that **you** make;
- to fulfil our legal and regulatory obligations;
- to provide **you** with relevant marketing information where **you** have provided consent for this;
- to process payments securely. If **you** use a payment card to make a payment we receive a unique transaction code and an extract of **your** card number only. This is stored to provide a record of the transaction;
- to renew **your** policy automatically if **you** pay for **your** policy via direct debit. We will write to **you** at least 28 days before **your** policy renews to advise of any changes to the terms and / or premiums;
- in the event that we process **personal information** outside the UK, the processing in those locations is protected by UK and European data standards. For example, where **your** claim occurs abroad we will also send data to the necessary service providers as required to service **your** claim;
- we may need to share any personal information, including policy, claims and suspected fraud and other financial crime information, with our reinsurers and reinsurance brokers. Reinsurers provide insurance policies to insurance companies.

\*Legitimate Interest means the interest of our business in conducting and managing our selves to enable us to give you the best products, services and customer experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests and have conducted a 'Legitimate Interests Assessment' (LIA) to facilitate this. This will be repeated at least every 2 years. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. Please refer to the 'Who we are and how to contact us' section if you wish to do so.

\*\*For a full list of current Vetsure accredited veterinary practices please visit <https://www.vetsure.com/our-network/>

### Automated decision making and profiling

We may use automated decision making, including profiling, to assess insurance risks, set premiums and administer **your** policy. This helps us decide whether to offer insurance, determine prices and validate claims. If **you** disagree with the outcome of any automated decision, please contact us. Please refer to the 'Who we are and how to contact us' section if you wish to do so.

### Your personal information rights

As a 'data subject', **you** have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- ✓ the right to be informed about how we collect and use **your personal information**;

- ✓ to access the **personal information** we hold about **you** (the right to access / data subject access request). Please note, under the GDPR, no fee is payable for this;
- ✓ to correct **personal information** we hold that is incorrect or incomplete (the right to rectification);
- ✓ to have **your personal information** deleted (the right to be forgotten);
- ✓ to restrict us processing **your personal information** (the right to restrict);
- ✓ receive **your personal information** in a portable format to re-use with another service or organisation (right to portability);
- ✓ to object to us processing **your personal information** for particular purposes (the right to object);
- ✓ to appeal a decision with respect to automated decision making and profiling.

If **you** consider that the processing of **personal information** by TVIS Limited (trading as Vetsure) is not in compliance with data protection laws and regulations, **you** may lodge a complaint with Vetsure and/or the Information Commissioners Office by following this link: [www.ico.org.uk](http://www.ico.org.uk).

You can contact Vetsure's GDPR Contact by email at [info@vetsure.com](mailto:info@vetsure.com) or by post at Data Protection, Vetsure, 1st Floor, Helios Court, 1 Bishop Square, Hatfield, Hertfordshire AL10 9NE.

If **you** consider that the processing of **personal information** by Atlas is not in compliance with data protection laws and regulations, **you** may lodge a complaint with Atlas and/or the Office of the Information and Data Protection Commissioner by following this link: <https://idpc.org.mt/en/Pages/contact/complaints.aspx>.

**You** can contact **Atlas'** GDPR Contact by email at [dpo@atlas.com.mt](mailto:dpo@atlas.com.mt) or by post at Data Protection, Atlas Insurance PCC Limited, 48-50 Ta' Xbiex Seafront, Ta' Xbiex XBX 1021 Malta.

### How long do we keep your personal information?

We only keep **your** personal data for as long as we need to in order to use it as described above in the 'How do we use and share **your** personal information' section, and/or for as long as we have **your** permission to keep it.

### Storage of personal information outside of the United Kingdom

Some or all of **your** data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). **You** are deemed to accept and agree to this by using our Site and submitting information to us. If we do store data outside the EEA, we will take all reasonable steps to ensure that **your** data is treated as safely and securely as it would be within the UK and under the GDPR.

### Other ways you can control use of your personal information

In addition to **your** rights under the GDPR (as set out in the '**Your personal information rights**' section, when **you** submit **personal information** to us), **you** may be given options to restrict our use of **your** information. In particular, we aim to give **you** strong controls on our use of **your** information for discretionary direct marketing purposes (including the ability to opt-out of receiving emails from us, which **you** may do by unsubscribing using the links provided in our emails. **You** can also update **your** marketing preferences when **you** first contact us or at any point thereafter.

We will only contact **you** by telephone if we need to discuss **your** policy with **you**. However, in more general terms, **you** may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone



Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent **you** receiving unsolicited marketing. Please note, however, that these services will not prevent **you** from receiving marketing communications that **you** have consented to receiving.

### **Communicating with us**

When **you** contact us, **personal information** that **you** give us will be recorded. This helps us optimise our customer service, train and develop our staff, respond to complaints and prevent fraud and other financial crime.

All communications will be in English. **You** can get this document from us in writing, Braille, large print or audiotape by contacting us.

### **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website. We recommend that **you** check this page regularly to keep up-to-date.