

## Ultimate Pet Partners Limited

### PRIVACY POLICY: HOW WE USE YOUR INFORMATION

UPP (“We, Us, Our”) a trading name of Ultimate Pet Partners Limited are committed to protecting your privacy. We take great care to ensure your information is kept safe and secure.

This policy explains how we will collect, store, use and share your personal information. We collect information in a number of ways including when you use one of our partner’s websites or another third party website, submit an application form or provide information to us by post, email, phone or text.

#### **About us**

We are Ultimate Pet Partners Limited and we are part of the Markerstudy Group of companies. We can be contacted at

The Connect Centre  
Kingston Crescent  
Portsmouth  
PO2 8DE

[customerqueries@ultimateservices.co.uk](mailto:customerqueries@ultimateservices.co.uk)

We also provide insurance administration services for our partners.

We, together with our group companies within Markerstudy Group provide insurance and associated services to our customers. We work with insurance companies to provide you with your insurance policy.

#### **Explanation of some of the terms used**

**Aggregator** – quote comparison websites such as ‘gocompare’/‘comparethemarket’

**Data Controller** – means the person or entity which alone or jointly with others determines the purposes and means of the processing of personal data

**Markerstudy Group** – details of the Markerstudy Group can be found at [www.markerstudygroup.com/about us](http://www.markerstudygroup.com/about-us)

**Sensitive Information** – this is also known as **Special Category Data** and includes information revealing, or about a person’s racial or ethnic origin, political opinions or trade union membership, religious or philosophical beliefs, health, sex life or sexual orientation, or genetic data and biometric data for the purpose of uniquely identifying a natural person. Information about criminal convictions is often included in this definition.

#### **Data Controllers**

For the purposes of the Data Protection Law the data controller for the services we provide to you will be Ultimate Pet Partners Limited. We are registered with the ICO, registration number Z1649575.

When you take out an insurance policy then the third party insurer will also be a data controller for the purposes of Data Protection Law.

Depending on how you were introduced to us there may be other companies who will also be considered a data controller. This could include, for example: a company who has appointed us to provide insurance services on their behalf; aggregator sites such as ‘gocompare’/‘comparethemarket’).

Where a third party data controller is involved in the provision of the insurance and ancillary services to you, we recommend that you also review their Privacy Policy as this will tell you how they will process your information.

## Data Protection Officer

We have appointed a Data Protection Officer to oversee our handling of personal information. Our Data Protection Officer can be reached at [dataprotection@markerstudy.com](mailto:dataprotection@markerstudy.com).

## Who do we collect information about?

We collect information about the following types of individuals:

- Previous, current and prospective customers/policyholders
- Person's authorised to speak to us on behalf of a customer or policy holder
- Third party claimants
- Witnesses to incidents
- Experts instructed in relation to claims
- Users of the Markerstudy group websites
- Business Partners

## When do we collect information about you?

We collect information about you:

- When we are providing you with a quotation when you apply for amend or renew a policy
- On a claim under a policy
- When you contact us (by phone, email, through our website or otherwise) such as to update or check your details, complete surveys, provide feedback, fill in forms, participate in competitions or complete applications for insurance policies or other goods/services
- When you register to use our website, subscribe to our services, search for a product, place an order on our website, participate in discussion boards or other social media functions on our website, leave any query or correspondence on our website, enter a competition, promotion or survey or when you report a problem with our website or any other activity undertaken with the Markerstudy group
- From third party databases (for example fraud check)
- When you contact us to make a complaint
- From third parties who are involved with the quote or renewal journey, for example an aggregator site

## What information do we collect about you?

The personal information that we collect will depend on your relationship with us. We will collect different information depending on whether you are a policyholder, website user, claimant, witness, expert or other third party.

Please note, in certain circumstances we may request and/or receive sensitive personal information about you. For example we may need access to health records for the purposes of processing claims, or for preventing, detecting and investigating fraud.

If you provide personal information to us about other individuals you agree: (a) to inform the individual about the content of this Privacy Policy; and (b) to obtain any consent where we indicate that it is required for the processing of that individual's personal data in accordance with this Privacy Policy. Please see below for detailed information regarding the types of personal information we are likely to collect and use about you.

### **Personal Information:**

- General information such as your name, address, date of birth, email address and phone number
- Details of previous policies or quotes between you and us
- Financial information such as payment card or bank account information and information which is pertinent to the administration of the quote, policy or claim
- Photograph, mobile phone, video footage or CCTV

- Details about you and your personal circumstances where this is appropriate in the administration of your quote, policy or claim for example information to allow us to identify a potentially vulnerable customer as well as other information you (or a third party) may provide to us as part of the quote, policy and /or claim administration processes whether through phone, email, letter, or via a website, App, social media or online chat
- We may collect information when you use our website including data that allows us to monitor your preferences and how you use our website. This helps us to organise our website content in order to improve your experience. The information we collect includes:
  - Details of transactions you carry out through our website.
  - Information that you provide by filling in forms on our website even if those forms are not submitted.
  - Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
  - Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time)
  - Products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page
- We may use cookies to collect information about how our website is used. Please see our cookies policy for more information about our use of cookies

***Special Category (sensitive) Personal Information and Criminal Personal Information:***

- Details about your health but only if this information is pertinent to (i) a claim (for example to establish the quantum of damages sought and potentially recoverable under the policy) and (ii) our fraud prevention investigations
- Other than as noted above, we do not actively request details about sensitive personal information including criminal personal information. However it may be recorded if it is provided by you (or a third party) as part of the quote for service and /or claim administration process whether through phone, email, letter, or via a website, PDA, social media or online chat

**How do we collect your information?**

We collect personal information from a number of different sources including:

- Directly from you or from someone else on your behalf by website, phone, email, SMS, on line chat and paper documents
- From our records
- From other companies within the Markerstudy Group
- From third parties (including aggregators, insurance companies, business partners, suppliers, payment and delivery services, third party claimants under a policy, medical representatives in the event of a claim, advertising networks, analytics providers and credit reference agencies)
- From other resources, for example, risk assessment models, pricing data, statistics and other information from public databases, websites and other sources, including aggregator websites
- Other publically available sources, including ,but not limited to, Google Earth and social media
- Through customer surveys
- Via insurance industry fraud prevention and detection databases, as well as sanctions screening tools

**What are the purposes for which information about you is used?**

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing. When the information that we process is classed as special category or sensitive personal information, we must have an additional legal ground for such processing.

Whether you provide us with the information, or we collect information from you or we are provided with information from other sources, we may use this information:

**a) To evaluate your insurance application and provide (and follow up) a quote**

**Legal grounds:**

- Our having an appropriate business need to use your information to provide insurance, which does not overly prejudice you
- Our providing your insurance contract

**b) To set you up as a policyholder including carrying out fraud, credit and anti-money laundering checks**

**Legal grounds:**

- To carry out our obligations arising from any insurance contract entered into between you and us

**c) To evaluate your application and ability to pay for your policy by instalments (if applicable)**

**Legal ground:**

- such use is necessary in order to provide your insurance policy

**d) To provide and manage your insurance policy**

**Legal grounds:**

- Our having an appropriate business need to use your information to provide insurance which does not overly prejudice you
- Our providing your insurance contract

**e) To provide and manage your claim (whether we are your insurers, we are acting for your insurer or whether you are a third party making a claim against us or a third party insurer for whom we act)**

**Legal grounds:**

- Our having an appropriate business need to use your information to manage an insurance contract and claim which does not overly prejudice you
- Our providing an insurance contract

**Additional legal ground for sensitive personal information:**

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts
- The use is necessary in order for us to establish, exercise or defend our legal rights

**f) Communicating with you and resolving any complaints that you might have**

**Legal grounds:**

- Our providing your insurance contract
- Our having an appropriate business need to use your information to manage and respond to complaints which does not overly prejudice you

**Additional legal ground for sensitive personal information:**

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent
- The use is necessary in order for us to establish, exercise or defend our legal rights

**g) To transfer to third parties for the purpose of providing you with the services required under the insurance contract or other services which you have elected to receive from us in connection with the insurance contract.**

**Legal grounds:**

- Our providing the insurance contract
- Our providing other contracted services

**h) To transfer to third parties where you have elected to enter into a contract with that third party for separate services.**

**Legal grounds:**

- You have provided your explicit consent to allow us to provide the third party with your details to enable you to enter into a contract with that third party

**i) Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.**

**Legal grounds:**

- Our providing your insurance contract
- Our having an appropriate business need to use your information to ensure fraud is detected which does not overly prejudice you

**Additional legal ground for sensitive personal information:**

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts

**j) Complying with our legal or regulatory obligations**

**Legal grounds:**

- The use is necessary in order for us to comply with our legal obligations

**Additional legal ground for sensitive personal information:**

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent
- The use is necessary in order for us to establish, exercise or defend our legal rights

**k) Recover outstanding payments**

**Legal grounds:**

- Our having an appropriate business need to use your information in order to recover debts which does not overly prejudice you

**Additional legal ground for sensitive personal information:**

- The use is necessary in order for us to establish, exercise or defend our legal rights

**l) To improve our customer service**

**Legal grounds:**

- Our having an appropriate business need to use your information in the improvement of our customer service which does not overly prejudice you

**m) To measure the effectiveness of our advertising**

**Legal grounds:**

- Our having an appropriate business need to use your information to ensure our advertising is effective which does not overly prejudice you

**n) To provide data analysis in order to assist us with the pricing of our products and detect market trends.**

***Legal grounds:***

- Our having an appropriate business need to use your information which does not overly prejudice you.

**o) To personalise your repeat visits to our website and to improve our website, including as part of our efforts to keep our website safe and secure**

***Legal grounds:***

- Our having an appropriate business need to use your information which does not overly prejudice you

**p) To notify you about changes to our services or products**

***Legal grounds:***

- Our having an appropriate business need to use your information to keep our customers up to date with changes to our products or services which does not overly prejudice you

**q) To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes**

***Legal grounds:***

- Our having an appropriate business need to use your information to maintain our websites which does not overly prejudice you

**r) To allow you to participate in interactive features of our services / website**

***Legal grounds:***

- Our having an appropriate business need to use your information to offer an interactive website for customers which does not overly prejudice you

**s) To transfer within the Markerstudy Group or to third parties for the purpose of conducting internet analytics.**

***Legal grounds:***

- Our having an appropriate business need to use your information to maintain our websites and undertake website analytics which does not overly prejudice you

**t) For analytical purposes and to improve our products and services. Where possible, we will anonymise such information**

***Legal grounds:***

- we have a legitimate business need to use your personal information for services improvement

**u) Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics**

***Legal grounds:***

- we have a legitimate business need to provide secure and quality services

***Additional legal ground for sensitive personal information:***

- |  |
|--|
| <ul style="list-style-type: none"><li>• Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent</li></ul> |
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## **Who do we share the information we collect about you with?**

### ***Sharing within our Markerstudy Group***

We may share your information within the Markerstudy Group for the following reasons:

- To obtain a quote
- To administer and manage the insurance contract (including where we act as an administrator for a Group company or the group insurance managing agent)
- To provide you with services required as part of insurance contract for example Bereavement Service
- To provide data analysis in order to assist us with the pricing of our products and detect market trends
- To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our website, including as part of our efforts to keep our website safe and secure
- To allow invoicing and to recover any outstanding payments
- For legal, financial reporting and regulatory purposes

### ***Sharing with third parties***

We may also share your information with selected third parties, in order to offer services to you or to perform any necessary functions on our behalf. This may include:

- Your relatives, executor or guardians (on your behalf where you are incapacitated or unable)
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf.
- Our insurance partners such other insurers, reinsurers or other companies who act as insurance distributors
- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company
- Other third parties you have asked us to engage with
- Overseas assistance companies
- Vets
- Business partners
  - Software Providers; who provide the technical infrastructure to allow us to provide your quote, policy and claim administration
  - Aggregators (when you have used their website to obtain our quote): to verify the policies obtained through their sites
  - Clients: for whom we provide insurance policy and administration
  - Companies you have agreed may receive your information to allow you to enter into a contract with them (for example, reward schemes or claims management companies)
- Suppliers
  - Companies engaged by us to provide contracted services for example,
    - Printing of invoices and policy documents
    - To allow us to record our incoming and outgoing calls with you
  - Companies engaged by us to provide aspects of our communications with you (for example, web hosting, online chat provider)
- Credit reference agencies

- Survey companies
- Data analytics advisors

Disclosure of your personal information to a third party outside of the Markerstudy Group will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also share your information with:

- Search engine operators who can assist us in the improvement of our website.
- Prospective buyers, in the event that we sell any business or assets.
- Regulators and other authorised bodies, whenever we are required to do so by law.
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

**Claims Checks**

We may also share your information with organisations that can check your claims history.

**What is our approach to sending information overseas?**

We may send your data outside the European Economic Area (EEA) if we are required to do so for a joint data controller (for example if an insurer is based overseas).

We seek to ensure that data which is processed on our behalf as data controller is retained within the EEA but this is sometimes difficult (for example a UK supplier may have a server based outside of the EEA).

If we make a transfer of your personal information outside of the EEA we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards.

**How long do we keep personal information for?**

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our contractual, legal and regulatory obligations.

We have implemented a Document Retention Policy which records of details how long various types of information should be retained. The Policy is reviewed on a regular basis to ensure that it aligns to current legal and regulatory requirements. The retention periods vary depending upon the circumstances of an individual matter but in general our retention periods for customer facing documentation can be set out as follows:

Quote Information	3 months
Policy Documents	7 years from cancellation of policy
Claims Documents	7 years from date of last settlement /order
Complaints	3 years from the complaint being resolved or the policy retention period whichever is the longer

If you would like further information regarding the periods for which your personal information will be stored, please see the contact details outlined in the "How to Contact Us" section below.

**Automated decision making**

Some of our decisions are made automatically by inputting your personal information into a system or computer and the decision is calculated using certain automatic processes rather than our employees making those decisions. We may make automated decisions in the following situations:



## Fraud prevention

We use computers to automatically run fraud and money-laundering checks which helps us to decide:

- whether someone might pose a fraud or money-laundering risk
- whether their behaviour is similar to that of known fraudsters or money launderers
- is inconsistent with information we already have about them
- if we think they are hiding their true identity

## Approving your application

We may use scoring methods to assess and approve or decline your application, to verify your identity and determine finance charges, for example;

Examples of information used by our systems to do this include: your name and your postcode. If you do not consent to us processing this information in this way, we may be unable to assess your application or offer you cover.

We use individual credit information about you provided to us by third parties in order to assess your suitability for insurance, the price offered to you and method of payment. The information used to assess your insurance risk includes: verification of your residence at address via bills and electoral roll, historic payment behaviour on financial products, prior insolvency and any prior county court judgements. If we are unable to validate your residence at the insured address or consider your historic payment behaviour with creditors to be significantly adverse we may vary our payment method or we may have to decline to offer you a price for your insurance risk.

## Auto Renewal

Where you have elected to pay by direct debit your policy will be auto renewed. You have the right to opt out of auto renewal at any point.

You have rights not to be subject to automated decision making; please see the "*your rights*" section below.

## **What marketing activities do we carry out?**

We do not actively market our products & services to policyholders or prospective customers. Please note that other companies within the Markerstudy Group of Companies may market to you for different products and services. Please refer to their Privacy Policy.

Legal & General may provide you with marketing information about their services or products where you've provided your consent for them to do so. You may opt out of marketing at any time by contacting us using the details set out in the "How to Contact Us" section of this Privacy Policy.

## **Your rights**

Under Data Protection Law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in the "How to Contact Us" section of this Privacy Policy.

Please note:

- In some cases we may not be able to comply with your request (e.g. we might not be able to delete your data) for reasons such as our own obligations to comply with contractual, legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why
- In some circumstances exercising some of these rights (including the right to erasure, the right to restriction of processing) will mean we are unable to continue providing you with cover under the policy and may therefore result in the cancellation of the policy. You will therefore lose the

right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled. For some policies no refunds will be payable on cancellation, for other products a refund may be payable

### **The right to access your personal information**

You have the right to access a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests.

### **The right to rectification**

We take reasonable steps to ensure that the personal information we hold about you is accurate and up to date. However, if you do not believe this is the case, you can ask us to update or amend it.

### **The right to erasure**

In certain circumstances, you may ask us to erase your personal information.

### **The right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal information.

### **The right to data portability**

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice.

### **The right to object to marketing**

You can ask us to stop sending you marketing messages at any time.

### **The right not to be subject to automated decision-making (including profiling)**

You have a right not to be subject to automated decision-making (as described above) and where automated decision-making used in the assessment of your application or fraud prevention, you can contact us to request that any declined decision is reconsidered. If you want to opt out of automatic decision-making, let us know, although in some circumstances it may mean we can't offer you a quote or policy as some automated decisions are necessary to provide your insurance policy.

### **The right to withdraw consent**

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

### **The right to lodge a complaint with the ICO**

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable Data Protection Laws and regulations.

More information can be found on the ICO's website at: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

Making a complaint will not affect any other legal rights or remedies that you have.

### **How we protect your information**

We want you to have confidence in how we use and hold your data. We know that to achieve this we must preserve the security and confidentiality of your personal information. We have therefore

developed a range of organisational, procedural and technical security measures designed to protect your personal information from unauthorized use or disclosure. Examples of some of these measures include:

- User and privileged account management including appropriate policies for password complexity, length and history
- Auditing of system users and administrators
- Regular backup schedules and disaster recovery environment for key systems and services.
- Secure file transfer methods are used to encrypt data
- Usage of data loss prevention tools within the Group
- Data breach detection: Security tools in place to detect unusual or abnormal activity
- Data breach investigation: Audit and logging tools used to investigate any potential or reported breaches
- Data breach response: A plan that pulls together our compliance, legal and IT security teams to ensure rapid assessment and mitigation of data breaches

### **Changes to our Privacy Policy**

We keep our Privacy Policy under review and it is updated periodically. For example, those changes may be due to government regulation, new technologies, or other developments in Data Protection Laws or privacy generally. You should check our website periodically to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: 30<sup>th</sup> March 2018

### **How to Contact Us**

Please contact us if you have any questions about our Privacy Policy or to exercise any of your rights

Data Protection Officer,  
45 Westerham Road,  
Sevenoaks,  
Kent  
TN13 2QB.

Or by email to [dataprotection@markerstudy.com](mailto:dataprotection@markerstudy.com)

Where you have made the request by electronic means, the information will be provided to you by electronic means where possible.

### **Other websites**

Our website may contain links to other websites. This Privacy Policy only applies to our own website so when you link to other websites you should read their own privacy policies. If this policy conflicts with any written contract that we have with you then the written contract shall take precedence.

### **Complaints**

If you have a complaint about how we use your information then please contact us at:

Data Protection Officer,  
45 Westerham Road,  
Sevenoaks,  
Kent  
TN13 2QB.

If you have a complaint about the way in which your data has been processed, you can contact the ICO at: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).