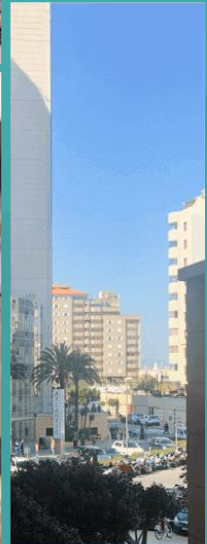




Privacy Policy

Last updated: 16th June 2020



Privacy Policy

Taurus Insurance Services Limited understands that Your privacy is important to You and that You care about how Your personal data is used. We respect and value the privacy of everyone who visits any of our websites (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and Your rights under the law.

Please read this Privacy Policy carefully and ensure that You understand it. Your acceptance of this Privacy Policy is deemed to occur upon Your first use of Our Site AND You will be required to read and accept this Privacy Policy when purchasing any of our Products. If You do not accept and agree with this Privacy Policy, You must stop using Our Site immediately.

1. Definitions and Interpretation

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

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on Your computer or device by Our Site when You visit certain parts of Our Site and/or when You use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 15, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“Our Site”	means this or any of the websites operated by Taurus or its group of companies;
“Product”	means a good, service or insurance policy supplied by Taurus to a customer via one of Our Sites or call centres;

2. Information About Us

Our Site is owned and operated by Taurus Insurance Services Limited, an Insurance Intermediary licenced and authorised in Gibraltar by the Financial Services Commission under Permission Number 5566 and authorised by the Financial Conduct Authority in the UK under registration number 444830.

Registered address: Taurus Insurance Services Limited, Suite 2209-2217, Eurotowers, Europort Road, Gibraltar.

Data Protection Officer:

Email address:	dpo@taurus.gi
Telephone number:	0330 041 2864
Postal Address:	Suite 2209-2217, Eurotowers, Europort Road, Gibraltar

3. What Does This Policy Cover?

This Privacy Policy applies only to Your use of **Our Site**. **Our Site** may contain links to other websites. Please note that We have no control over how Your data is collected, stored, or used by other websites and We advise You to check the privacy policies of any such websites before providing any data to them.

4. What Legislation is Applicable to My Data?

- General Data Protection Regulation (EU Regulation 2016/679)
- Data Protection Act 2018
- Privacy and Electronic Communications (EC Directive) Regulations 2003

5. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about You that enables You to be identified. Personal data covers obvious information such as Your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

6. What Are My Rights?

Under the legislation covering Your Data You have the following rights, which We will always work to uphold:

- a) The right to be informed about our collection and use of Your personal data. This Privacy Policy should tell You everything You need to know, but You can always contact us to find out more or to ask any questions using the details in Part 16.
- b) The right to access the personal data We hold about You. Part 14 will tell You how to do this.
- c) The right to have Your personal data rectified if any of Your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 16 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of Your personal data that We have stored (subject to certain contractual, legal and regulatory limitations). Please contact us using the details in Part 16 to find out more.
- e) The right to restrict (i.e. prevent) the processing of Your personal data.
- f) The right to object to us using Your personal data for a particular purpose or purposes (subject to certain limitations).
- g) The right to data portability. This means that, if You have provided personal data to us directly, We are using it with Your consent or for the performance of a contract, and that data is processed using automated means, You can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling.

For more information about our use of Your personal data or exercising Your rights as outlined above, please contact us using the details provided in Part 16 of this Privacy Policy.

Further information about Your rights can also be obtained from the Information Commissioner's Office or Your local Citizens Advice Bureau.

If You have any cause for complaint about our use of Your personal data, You have the right to lodge a complaint with the Information Commissioner's Office.

7. What Data Do We Collect?

Depending upon Your use of **Our Site** and Our Products We may collect some or all (but not limited to) of the following personal and non-personal data (please also see Part 15 on our use of **Cookies** and similar technologies):

Contact Information:

- Full name
- Address
- Email address
- Telephone number(s)
- Third party contacts (e.g. family members or friends)
- Social media handles

Personal Data:

- Age
- Gender
- Lifestyle
- Health details
- Employment details
- Location

Financial:

- Bank and/or debit/credit card details

Technical:

- IP Address(es)
- Web browser type and version
- Device make, model and value
- Device IMEI/serial number
- Linked telephone numbers
- Operating System

Public Records & Open Sources:

- Electoral register
- Police theft and loss history

- Other information about You that is openly available on the internet

Claim (to allow verification of Your claim, including but not limited to):

- Proof of purchase
- Proof of usage
- Previous claim history
- Identification
- Proof of address
- Proof of travel
- Network provider details

8. How Do You Use My Personal Data?

Under the current data protection legislation, We must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with You, because You have consented to our use of Your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one or more of the following purposes:

To fulfil a contract

- Providing and Managing access to **Our Site**.
- Providing our Insurance Products and Services to You. Your personal details are required in order for us to enter into a contract with You.
- Analysing Your use of **Our Site** and gathering feedback. This is to enable us to continually improve **Our Site** and Your user experience.
- Analysing Your usage of our Insurance Products provided to You. This may include analysing the devices You have on cover over time and any claims raised so We can further tailor our products.
- Servicing Your Insurance Policy. This will include inviting You to renew a policy to ensure ongoing insurance coverage.
- Communicating with You. This may include responding to emails and calls from You.
- Administering an Insurance Claim.
- Performing necessary fraud checks.

Complying with regulation or legal requirements

- We will process Your personal information to comply with any legal obligation.
- Identity verification
- Complaint resolution
- Crime prevention and/or reporting

Where You have provided consent

- Supplying You with marketing information by email, SMS, phone AND/OR post that You have opted-in to. You may unsubscribe or opt-out at any time by contacting opt-out@taurus.gi.

On the basis of legitimate interest

- Personalising Your experience on **Our Site**.
- Personalising our Insurance Products AND Services for You.
- Providing You with details of the quote You obtained on **Our Site** via email, phone and/or SMS, to help You to make an informed decision on Your insurance requirements.
- If You have purchased cover from us We will share information with You that is related to Your cover to help You make informed insurance decisions, unless You have unsubscribed from this service.
- Contacting You to ask for feedback on the product and/or service You have purchased or used, including requests from external review platforms that We have partnered with.
- Contacting You to ask for feedback after You have used our support channels with a view to improving how We interact with customers.
- Contacting You to ask for feedback after You have claimed with a view to improving our processes
- We record our communications with our customers and use them to improve our processes. For example, listening to a percentage of phone recordings for audit and training purposes.

With Your permission and/or where permitted by law, including the basis of legitimate interest, We may also use Your personal data for marketing purposes, which may include contacting You by email, SMS, AND/OR post with information, news, and offers on our products AND/OR services. You will not be sent any unlawful marketing or spam. We will always work to fully protect Your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and You will always have the opportunity to opt-out of marketing communications.

Once You have asked to be unsubscribed Your details will be removed from our marketing database within 30 days. You will then not be contacted by us other than in relation to Your policy where such contact allows us to fulfil our contractual obligations to You.

We use the following automated systems for carrying out certain kinds of decision making AND/OR profiling. If at any point You wish to query any action that We take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives You the right to do so. Please contact us to find out more using the details in Part 15.

The following automated decision-making method(s) may be used:

- Evaluating the circumstances of Your insurance claim so that We may provide an expedited claims experience. All claims that are not expedited are manually reviewed.
- We may assess the information that You have supplied to provide quotations, make underwriting decisions and calculate applicable premiums.
- Determining when to provide You with tailored communications regarding Your insurance products.

9. How Long Will You Keep My Personal Data?

We will not keep Your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Personal information related to a personal insurance quote will be kept for a period 40 days;
- Personal information and any subsequent communications between us and You that are related to a purchased insurance policy AND/OR an insurance claim will be kept for a period of 7 years;
- All call recordings will be kept for a period of 7 years
- Service email communications will be kept for a period of 7 years

Where You have given us permission to contact You for marketing purposes, We will treat any renewal of Your policy, on either a monthly or annual basis, as a refreshment of Your consent to continue receiving marketing communications. This consent can be withdrawn at anytime by contacting opt-out@taurus.gi. This permission will be kept for a period of 13 months to allow us to provide relevant information to You.

10. How and Where Do You Store or Transfer My Personal Data?

Under no circumstance do We share or sell personal information for any commercial or marketing purpose unrelated to the delivery of Taurus Products and Services without asking You first.

Where We store or transfer Your personal data within the European Economic Area (the “EEA”) Your personal data will be fully protected under the GDPR and other applicable legislation. The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein.

Where permitted by applicable law, We may transfer Your personal data to the United States and other jurisdictions outside the European Economic Area (‘EEA’) for the purposes set out in this Privacy Policy.

We have implemented standard contractual clauses approved by the European Commission with those organisations along with using companies who are participants in the EU-US Privacy Shield to ensure You have equivalent data protection rights as afforded within the EEA.

We share Your data within the group of companies of which We are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the European Commission.

Please contact us using the details below in Part 16 for further information about the particular data protection mechanism used by us when transferring Your personal data to a third country.

The security of Your personal data is essential to us, and to protect Your data, We take a number of important measures, including the following:

- Only allowing certain named individuals access to personal information only where there is a business need to do so, for example, when an agent reviews an insurance claim;
- Using strong encryption when processing Your personal information.

- Payment information is stored in an encrypted tokenised format meaning that We do not store payment information in a way where it is reusable.

11. Do You Share My Personal Data?

In addition to the third parties mentioned above, We may disclose Your information to third parties for Our legitimate business interests or as follows to supply certain services. In some cases, those third parties may require access to some or all of Your personal data that We hold.

- to the underwriter of the policy that You have purchased to create and service the policy;
- to payment providers for the processing of payments and refunds;
- to Insurers and scheme brokers in performance of a contract;
- to brand partners who We operate insurance schemes for on their behalf;
- to staff members in order to facilitate the provision of goods or services to You;
- to our affiliated entities to support internal administration;
- to logistics companies to arrange pickup and delivery of items and devices;
- to IT software providers that host our website and store data on our behalf;
- to external review platforms that We have partnered with to collect feedback on our behalf;
- to suppliers of goods and services necessary for the performance of any contract You may have with us; for example the supply of repair services or replacement devices;
- to professional advisers including consultants, lawyers, bankers and insurers who provide us with consultancy, banking, legal, insurance and accounting services;
- to HM Revenue and Customs, regulators and other authorities who require reporting of processing activities in certain circumstances; and
- to third parties who We may choose to sell, transfer or merge parts of our business or assets. Alternatively, We may seek to acquire other business or merge with them. If a change happens to our business then the new owners may use Your personal data in the same way as set out in this Privacy Policy.

We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where We are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If any of Your personal data is required by a third party, as described above, We will take steps to ensure that Your personal data is handled safely, securely, and in accordance with Your rights, our obligations, and the third party's obligations under the law, as described above in Part 10.

If any personal data is transferred outside of the EEA, We will take suitable steps in order to ensure that Your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 10.

In some limited circumstances, We may be legally required to share certain personal data, which might include Yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

12. How Can I Control My Personal Data?

In addition to Your rights under the GDPR, set out in Part 6, when You submit personal data via **Our Site**, You may be given options to restrict our use of Your personal data. In particular, We aim to give You strong controls on our use of Your data for 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 or at the point of providing Your details and by managing Your Account).

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.

13. Can I Withhold Information?

You may access certain areas of **Our Site** without providing any personal data at all. However, to use all features and functions available on **Our Site** You may be required to submit or allow for the collection of certain data.

You may restrict our use of **Cookies**. For more information, see Part 15 OR our **Cookie Policy** www.taurus.gi/privacy#cookies.

14. How Can I Access My Personal Data?

If You want to know what personal data We have about You, You can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

To make this as easy as possible for You, a Subject Access Request Form is available for You to use and can be requested via the contact details found in Part 16. You do not have to use this form, but it is the easiest way to tell us everything We need to know to respond to Your request as quickly as possible.

There is not normally any charge for a subject access request. If Your request is ‘manifestly unfounded or excessive’ (for example, if You make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will acknowledge Your subject access request within five working days and will provide the requested information within not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of Your personal data within that time. In some cases, however, particularly if Your request is more complex, more time may be required up to a maximum of three months from the date We receive Your request. You will be kept fully informed of our progress.

15. How Do You Use Cookies?

Our Site may place and access certain first-party **Cookies** on Your computer or device. First-party **Cookies** are those placed directly by us and are used only by us. We use **Cookies** to facilitate and improve Your experience of **Our Site** and to provide and improve our products AND/OR services. We have carefully chosen these **Cookies** and have taken steps to ensure that Your privacy and personal data is protected and respected at all times.

We also use some carefully selected 3rd party suppliers to enhance Your online experience and they will place **cookies** on Your computer for use on our website too.

Cookies are perfectly safe to be stored on Your computer and almost all web browsers have **cookie** storing enabled as default. However, all browsers have the option of disabling **cookies** being stored on Your computer if You wish to do this.

Please be aware that disabling all **cookies** on Your browser will reduce Your ability to shop online. We use **cookies** to process products in Your basket and orders.

Certain features of **Our Site** depend on **Cookies** to function. **Cookie Law** deems these **Cookies** to be “strictly necessary”. These **Cookies** are shown in the table below. Your consent will not be sought to place these **Cookies**, but it is still important that You are aware of them. You may still block these **Cookies** by changing Your internet browser’s settings as detailed below, but please be aware that **Our Site** may not work properly if You do so. We have taken great care to ensure that Your privacy is not at risk by allowing them.

The following first-party **Cookies** may be placed on Your computer or device:

Name of Cookie	Purpose	Strictly Necessary
ASP.NET_SessionId	Used to identify a user and track a user’s progress through an insurance application.	Yes
uservars	Used to identify referral of a user and certain user selections throughout the website.	Yes

Our Site uses analytics services provided by Alphabet Inc. and Wingify. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how **Our Site** is used. This, in turn, enables us to improve **Our Site** and the products AND services offered through it.

The analytics service(s) used by **Our Site** use(s) **Cookies** to gather the required information. You do not have to allow us to use these **Cookies**, however whilst our use of them does not pose any risk to Your privacy or Your safe use of **Our Site**, it does enable us to continually improve **Our Site**, making it a better and more useful experience for You.

The analytics service(s) used by **Our Site** use(s) the following **Cookies**:

Name of Cookie	First/Third Party	Provider	Purpose
_ga	Third party	Alphabet Inc.	Used to provide end user usage analytics on our site.
_gat	Third party	Alphabet Inc.	Used to provide end user usage analytics on our site.
_gid	Third party	Alphabet Inc.	Used to identify the site for usage analytics on our site.
_vis_opt_s	Third party	Wingify	Used to provide end user usage analytics on our site.
_vis_opt_test_cookie	Third party	Wingify	Used to provide end user usage analytics on our site.
_vwo_uuid	Third party	Wingify	Used to provide end user usage analytics on our site.
_vwo_uuid_v2	Third party	Wingify	Used to provide end user usage analytics on our site.
Pnctest	Third party	Freshdesk Inc.	Used to identify a user chat session when navigating through different sections of our site.
AWSALB, FormSpringFormSession, FormSpringFormView, NID, PHPSESSID	Third party	FormStack	Used to identify a user and track a user's progress through a claim application.

In addition to the controls that We provide, You can choose to enable or disable **Cookies** in Your internet browser. Most internet browsers also enable You to choose whether You wish to disable all **Cookies** or only third-party **Cookies**. By default, most internet browsers accept **Cookies**, but this can be changed. For further details, please consult the help menu in Your internet browser or the documentation that came with Your device. For further information about **cookies** and how to disable them please go to the Information Commissioner's webpage on **cookies**: <https://ico.org.uk/for-the-public/online/cookies/>.

You can choose to delete **Cookies** on Your computer or device at any time, however You may lose any information that enables You to access **Our Site** more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that You keep Your internet browser and operating system up-to-date and that You consult the help and guidance provided by the developer of Your internet browser and manufacturer of Your computer or device if You are unsure about adjusting Your privacy settings.

16. How Do I Contact You?

To contact us about anything to do with Your personal data and data protection, including to make a subject access request, please use the following details:

Email address:	dpo@taurus.gi
Telephone number:	0330 041 2864
Postal Address:	Suite 2209-2217, Eurotowers, Europort Road, Gibraltar

17. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if We change our business practices in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations.



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