

DEBENHAMS

PERSONAL FINANCE

PRIVACY AND COOKIE POLICY: HOW WE USE YOUR INFORMATION

Debenhams Retail Plc is an introducer. This means that Debenhams Retail Plc introduce us to you as a customer. If you would like to see Debenhams Retail Plc policy then please see here:

www.debenhams.com/wcsstore/DebenhamsUKSite/faq/legal_information/privacy_policy.html

BDML Connect Limited are part of the Markerstudy Group of Companies (the “**Group**”) and are committed to protecting your privacy. We take great care to ensure your information is kept safe and secure. The companies within our group are very diverse and there are a number of ways in which your information may be processed.

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 our website, submit an application form or provide information to us by post, email, phone or text.

BDML Connect Limited are authorised and regulated by the Financial Conduct Authority (No. 309140). Registered in England and Wales Number 3299891. Registered Office: 45 Westerham Road, Bessels Green, Sevenoaks, Kent, TN13 2QB. Policies are underwritten by International Insurance Company of Hannover SE who are registered in Germany, registration number HRB 211924. Registered Office Roderbruchstraße 26, 30655 Hannover, Germany acting through its UK branch whose office is located as 10 Fenchurch Street, London, EC3M 3BE, United Kingdom. Authorised by the Bundesanstalt für Finanzdienstleistungsaufsicht, and authorised and subject to limited regulation by the Financial Conduct Authority (No. 659331). Details about the extent of its authorisation and regulation by the Financial Conduct Authority are available from us on request. Third party liability is underwritten by Ageas Insurance Limited, Ageas House, Tollgate, Eastleigh, Hampshire, SO53 3YA, United Kingdom. Registered No. 354568, Financial Services Register no. 202039.

For the purpose of the Data Protection Act 1998 (the “**Act**”), the data controller will be BDML Connect Limited.

What information do we collect about you?

We may collect and use details such as:

- **Information you give us:**
 - This may include your name, address, email address and phone number, financial and credit card information, personal description and photograph
 - Details about you and your personal circumstances. These may be collected when we are providing a quotation
 - Details that you give us when you contact us (by phone, email, through our website or otherwise), complete surveys, provide feedback, fill in forms, participate in competitions or complete applications for insurance policies or other goods/services
 - Details provided 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 Group
 - Details about your health. These details may be collected for the purposes of administering your insurance policy or for the purposes of dealing with your claim.
- **Information we may automatically collect about you:**
 - If we are selling pet insurance, we may collect personal details about you, your pet, previous claims and personal history. We may collect some details about your claims history and other personal details if we are selling other forms of insurance

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- 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 computer 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 site (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 and any phone number used to call our Customer Service number
- We may use cookies to collect information about how our website is used. Please see the paragraph below on cookies
- We may also collect information from other sources, including (but not limited to) Google Earth and social media.
- **Information we receive from other sources:**
 - We work closely with third parties (including business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them
 - We may also receive information from other resources, for example, risk assessment models, pricing data, statistics and other information from public databases, websites and other sources, including aggregator websites, which is used in conjunction with the information we collect about you for processing your data in accordance with this policy.

How will we use the information about you?

We may use your information within the Markerstudy Group of Companies in accordance with this policy.

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:

- to carry out our obligations arising from any contracts entered into between you and us and to process your order, applications (whether automated or not) and to manage your account and recover outstanding payments
- to process data relating to claims history for the purposes of assessing insurance applications and/or processing claims
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you with information about goods and services similar to those which were the subject of a previous arrangement that we had in place with you. If you do not want us to use your data in this way, or pass your details on to third parties for marketing purposes, please unsubscribe to receiving such marketing information (further details are provided in the 'Marketing' section below)
- to provide news updates, details of special offers and to contact you about other products and services we think may be of interest to you
- to carry out checks on you such as fraud checks or credit checks or checks to assist us with the pricing of your policy or your claim
- to improve our customer service

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- to analyse information we have collected about you along with information from other sources to detect trends and better understand your needs
- to measure the effectiveness of our advertising
- to provide data analysis in order to assist us with the pricing of our products
- 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

- to notify you about changes to our services or products
- to administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- to allow you to participate in interactive features of our services/website
- to combine with other information that you provide to us, information we have collected about you or information from other sources, such information will be used for the purposes set out in this Privacy Policy
- to sell information that you have provided to us to third parties, but only where those third parties consent to using the data for the same purpose that it was originally obtained by us. By submitting your personal data to us you are consenting to using your data in this way
- to transfer to third parties for the purpose of conducting internet analytics.

How we may share the information we collect about you?

We may share your information with members of the Markerstudy Group of Companies, as defined in section 1159 of the UK Companies Act 2006. We may also share your information with selected third parties, which may include other insurance companies, solicitors, business partners, suppliers, credit reference agencies, survey companies, data analytics advisors, search engine operators and other contractors in order to offer services to you or to perform any necessary functions on our behalf. We provide more details on this below.

We may also share your information with:

- Search engine operators who can assist us in the improvement of our site
- Prospective sellers or buyers, in the event that we sell or buy any business or assets
- Marketing companies who may sell your information
- Regulators and other authorised bodies, whenever we are required to do so by law.

Data Storage and Transfers

We may send your data outside the European Economic Area for processing and storage. By submitting your personal data to us you are consenting to the storage and transfer of your data in this way. If we do this we will take reasonable steps to protect your data.

Fraud Prevention and Detection

Insurance companies and their service providers within our Group sometimes carry out fraud checks. This may include sharing information with:

- organisations that carry out fraud checks
- fraud prevention agencies
- police and law enforcement agencies, and organisations that hold databases of fraud information that we may check your details against.

We may check the details you provide to us against the information on fraud databases.

Claims Checks

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

Other Databases

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We may also share your information with other databases. These may be accessed by police and other organisations to check the details of your personal circumstances.

Marketing

We may send you information about our products and services and those of other companies in our Group which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. We may send this information to you directly or via third parties such as search engine operators and marketing companies who may market to you.

You have a right at any time to ask us not to contact you for marketing purposes or disclose your details to other companies.

We will not share your information with third parties for marketing purposes, unless we have obtained your specific consent to do so at the time we collect your information.

If you no longer wish to be contacted for marketing purposes, please contact us at customerqueries@bdml.co.uk.

Access to your information and correction

You have the right to access information we hold about you. If you would like access to such information, please write to us at BDML Connect Limited, The Connect Centre, Kingston Crescent, Portsmouth, PO2 8QL. We may charge a fee of £10 for each request to meet our costs in providing you with details of the information we hold about you.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Data retention

Where we do hold any of your personal data, we will only hold such data for as long as is necessary in accordance with the Act.

Cookies and our website

We may use cookies when you use our website. Cookies are text files placed on your computer to monitor how you use our site. We use them to improve our site and to help provide you with a good experience. The type of information we collect may include your internet service provider's name and details about the pages you accessed. None of the cookies used on our website collect personally identifiable information about you.

We may, at one time or another, use three different types of cookies on our website:

- Session cookies that are deleted after each visit
- Persistent cookies that remain in place across multiple visits to our sites
- Third party cookies that are used by our approved business partners.

For further information about cookies visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

We may also use:

- Big data analytics – This cookie enables us to access all web traffic to help us improve your browsing experience on our site.

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- Big data conversion code – Our website may use conversion code tracking to establish whether an advertisement has driven an enquiry.
- Data capture – The enquiry forms within our website capture a user's data prior to form submission. This is so we can further improve the user journey and also perform a customer service call (if needed) to ensure the user had obtained all of the information required from our website.

Remarketing from cookies – We may use remarketing advertising to deliver targeted advertising messages to users that have previously shown interest in our website.

Changes to our Privacy Policy

We keep our privacy policy under review. This privacy policy was last updated on 1st August 2016. Any updates to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

How to Contact Us

Please contact us if you have any questions about our privacy policy or information we hold about you by contacting us at:

Address: Debenhams Pet Insurance, BDML Connect Limited, The Connect Centre, Kingston Crescent, Portsmouth, PO2 8QL.

Email: customerqueries@bdml.co.uk

Telephone: 0333 234 0622

Lines open Monday – Friday 8am-8pm, Saturdays 9am-5pm, closed Sundays.

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.