Peppercorn

Peppercorn Al Holdings Limited Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Email us at dp@peppercorninsurance.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

Website user information

We may collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Website and app user journey information
- IP addresses

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.



Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- **Your right to erasure** You have the right to ask us to delete your personal information. <u>You can read more about this right here</u>.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where we get personal information from



- Directly from you
- As you interact with our website and navigate our services, we automatically collect certain information about you, including technical data. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our and other technical information. This information is needed to maintain the security and operation of our services, and for our internal analytics and reporting purposes.
- We use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Please refer to our cookie policy for more information on the types of cookies and their duration

How long we keep information

We will only keep your personal data for as long as it is reasonably necessary for the purposes set out in this privacy policy, unless a longer or shorter retention period is required, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We keep basic information about our customers for six (6) years after they cease being customers. We further retain user analytics data for a period not exceeding twelve (12) months from the date of collection, solely for the purpose of analysing and enhancing our services and improving user experience

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors

Google Workspace - This data processor does the following activities for us: Storage of information gathered and generated.

We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data, namely Ireland.



We will not otherwise transfer your personal data outside of the UK or the EEA

Third-party websites

This website and our Services may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We do not control these third party websites and cannot guarantee the safety and privacy of data you provide to any third parties.

Any data collected by third parties is not covered by this privacy policy.

We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from our Services.

When you leave our website, you should review the policies of such third parties and contact them directly to respond to your questions.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint