

Brolly Privacy Notice

We respect the privacy of every person (“**you**”, a “**user**” or a “**customer**”) who registers with the Brolly app or visits Brolly’s website and/or uses the services made available by us from the Brolly app and Brolly website (the “**Brolly Service**”) and we are committed to ensuring a safe online experience.

1. Purpose of this Notice

This privacy notice explains our approach to any personal information that you might supply to us (or that might be collected from you) in connection with your use of the Brolly Service, including stating our legal basis for processing that information. The Notice also sets out your rights in respect of Brolly’s processing of your personal information.

This privacy notice will inform you how you can verify which of your personal information is collected by us through the Brolly Service and how you can request that we delete, update or transfer it.

This privacy notice is intended to assist you in making informed decisions when using the Brolly Service. Please take a moment to read and understand it. Please note that it should be read in conjunction with our [Terms and Conditions](#).

Please also note that this privacy notice only applies to the use of personal information collected by us from your use of the Brolly Service or during your communications with us. It does not apply to personal information collected during your communications or other dealings with third parties (i.e. individuals or organisations other than Brolly).

2. Who are we and what do we do?

The Brolly Service is operated by Brolly UK Technology Limited (“**Brolly**”) whose principal activities include providing insurance related services to consumers. For more information [click here](#).

Brolly is the data controller responsible for your personal information. Brolly is registered at the UK Information Commissioner’s Office with registration number: ZA187415.

Brolly is an English company with registered company number: 10134039 and whose principal address is 1st Floor, Gensurco House, 3-5 Spafield Street, London, EC1R 4RP.

Brolly’s principal business activities include providing insurance services to customers through which Brolly may market its own insurance products and insurance products of third parties in addition to managing the customer’s insurance portfolio.

3. How to contact us:

If you have any questions about this privacy notice or want to exercise your rights, please contact us by:

- sending an email to privacy@heybrolly.com;
- writing to us at Brolly UK Technology Limited, 1st Floor, Gensurco House, 3-5 Spafield Street, London, EC1R 4QB, marking your letter for the attention of Customer Support.

4. What personal information do we collect and how do we collect it?

Our primary goal in collecting personal information from you is to give you a useful and enjoyable experience that is highly customised towards your individual lifestyle, assets and insurance

portfolio. This lets us to be as effective as we can in helping you to manage your insurance portfolio, and it allows us to develop and provide products, services and features that are likely meet your needs. In order to do all of this, personal information may be collected from you in the following ways:

- Information you voluntarily provide to us:

We collect and maintain personal information that you voluntarily submit to us during your use of the Brolly Service (e.g. when registering or creating a profile, during the course of email exchanges with us or other members, as part of any customer support interactions and/or surveys, or when participating in discussions and/or forums).

In particular, when you initially sign up and create an account we require the following personal information from you:

- name;
- e-mail address; and
- password.

Through your use of the Brolly Service (for example when using the Brolly advisor - whether online or within the app, when uploading policies to your locker, or when completing a quote form for insurance) we may collect the following additional personal information from you:

- information about your living situation including home address, if you are a homeowner or tenant, number of people living in the home, high-value items you may own;
- information about your existing insurance policies/products;
- information about you such as your date of birth, sex, marital status, existence of dependencies, employment status;
- information about your lifestyle including pets, travel, car or other vehicle ownership/lease arrangements;
- information about your finances including income, savings, financial assets, other financial support, mortgages and other financial loans, credit card debt; and
- information about your health including medical conditions, prescribed medications, treatment history.

You have the flexibility to provide us with as little or as much information as possible. However, the more information you provide, the more you will get out of the Brolly Service. In some cases - for example when seeking an insurance quote - you will not be able to proceed without providing a certain amount of personal information.

We will also collect information from your email account if you consent to us accessing it through the app.

Please be aware that if you activate the option for Brolly to directly connect to your email account so that Brolly can analyse your email account and find your insurance policies, such access will provide Brolly with read access to your entire email account, although we will only process personal information necessary for us to provide the Brolly Service.

If you contact us, we may collect additional information from you such as a telephone number.

- Information we collect through your use of Brolly:

We may collect through our use of cookies, pixels, beacons, log files and other technologies personal information regarding your mobile device, computer hardware and software used to access the Brolly Service. This may include (but is not necessarily limited to) the following:

- IP address of device(s) used;
- browser type;
- operating system and device type;
- approximate location (e.g. Heathrow Airport);
- access times and dates; and
- referring website addresses.

We may also collect personal information regarding your use of and activity on the Brolly Service. For example, what types of insurance products you are looking at.

This personal information allows us to deliver more helpful information, services and tools. Please see our [Cookie Policy](#) for further information.

- Information we collect from third parties:

We may also combine personal information that we collect through your use of the Brolly Service with personal information that:

- a) you provide to a third party provider of insurance whose site, app or other portal you have accessed via a link hosted within the Brolly Shop;
- b) you have provided to third parties and in respect of which you have given the third party permission to share with Brolly; and/or
- c) we have obtained from a public record.

5. How do we use your personal information?

We collect and use your personal information to operate the Brolly Service efficiently and to deliver you the very best service. In particular, we may use your personal information for the following purposes:

- Provision of the Brolly Service:

We shall use your personal information to provide the Brolly Service to you. This will include using and analysing your personal information to advise you on what type of insurance products you might require, to manage and help you understand your insurance portfolio (including by comparing it to other users fitting your profile), to make recommendations of the suitability of specific insurance products to your requirements, to provide insurance quotes, and to develop and provide insurance products to you.

What is our legal basis?

It is necessary for us to use your personal information to provide the Brolly Service to you and perform our obligations in accordance with any contract that we may have with you, including the Brolly [Terms and Conditions](#). It is also in our legitimate interest to use your personal information in such a way to ensure that we provide the very best service we can to you.

Where we process your sensitive personal data, we shall be relying on your consent to do so.

- Profiling:

We shall use your personal information for profiling purposes in order to decide which insurance product may be most appropriate for you and provide insurance quotes.

What is our legal basis?

Where we sell Brolly insurance products to you, it is necessary for us to carry out such profiling in order to enter into a contract with you and/or perform that contract (namely the Brolly [Terms and Conditions](#) and Terms of Business - accessible through the app when purchasing insurance)). However, profiling using your sensitive personal information will be done with your consent.

- Service administration:

We may use your personal information to:

- *develop and improve the Brolly Service;*
- *send you administrative e-mails about the Brolly Service; and*
- *contact you to answer any queries you may have.*

What is our legal basis?

It is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best service we can to you and to consistently improve the Brolly Service for all users.

- User Data Analysis:

We may use your personal information on an anonymised and/or pseudonymised basis to analyse, benchmark and conduct research on users and their interactions with the Brolly Service, Brolly and third party insurance providers.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is in a pseudonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure we are aware of market trends and ensure that the products and services we provide are relevant to you.

- Internal record keeping and legal compliance:

We may use your personal information for internal record keeping purposes (including complying with regulatory obligations and protecting our legal rights), to check you comply with the [Terms and Conditions](#) and Terms of Business (if relevant).

What is our legal basis?

It is in our legitimate interest to ensure that we keep our records up-to-date in order to monitor who uses the Brolly Service, to comply with our legal obligations, protect our rights

and to monitor your compliance with the Terms of Use and Terms of Business.

- Marketing by us:

Where you consent, we may use your personal information to contact you by e-mail about our products and/or services and third party insurance providers.

What is our legal basis?

Your consent, obtained via an opt-in box on registration (or login for existing users) for the Brolly Service within the app.

- Sharing information with third party processors:

We may share your personal information with third party processors in order to provide the Brolly Service and associated products and services to you. This includes making our database and records accessible to software developers.

What is our legal basis?

It is in our legitimate interest to share your personal information in such a way to ensure that we provide the very best service we can to you. Where we share your sensitive personal data, we shall be relying on your consent to do so.

- Sharing information with professional advisors, governmental authorities & potential purchasers. For more information click [here](#).

We may share your personal information with professional advisers or governmental or regulatory authorities:

- *to enable them to process your personal information on our behalf in a manner consistent with this privacy notice;*
- *to comply with our legal obligations;*
- *to enforce our legal rights; or*
- *protect rights of third parties.*

Your personal information may also be shared with prospective buyers if we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.

What is our legal basis?

It is in our legitimate interest to share your personal information with such third parties to enable them to process your information on our behalf, to comply with and/or enforce our legal rights and obligations, to protect the rights of third parties and to facilitate business transitions. Where we share your sensitive personal data, we shall be relying on your consent to do so.

- Sharing information with other insurance providers. For more information click [here](#).

We may share your personal information with other insurance providers so that they can provide products and services to you, and so that we can give you information about prices available in the market.

What is our legal basis?

It is necessary for the performance of a contract (namely Brolly's Terms of Business and/or any contract of insurance) to share your personal information with insurance providers so that we can provide you with insurance quotes and they can provide you with insurance products and services. It is in our legitimate interest to provide you with information on prices available in the market in order to provide you the best service possible. Where we share your sensitive personal data, we shall be relying on your consent to do so.

To the extent we share information so that insurance providers can market to you, we will also rely on your consent.

Any other purposes for which we wish to use your personal information will be notified to you from time to time, including the legal basis of such use.

6. How do we obtain your consent?

Where use of your personal information by us requires your consent, it will be obtained via one or more opt-in box(es) presented to you on registration for (or login to) the Brolly Service. These opt-in boxes clearly and specifically set out the type of processing for which we are seeking consent. We do not assume consent by your reading this Notice or by your signing up to the Brolly Service.

You may withdraw your consent at any time by visiting the settings page within the app.

The consent that we seek is fundamental to the provision of the Brolly Service as a whole - which relies on the processing of a range of personal information in order to provide a customised service to each user. For this reason we are unable to provide the Brolly Service if this consent is not given, and must cease providing the Brolly Service if it is withdrawn.

7. Children

You are required to be at least 16 years old to use the Brolly Service so we do not intentionally collect personal information from anyone under 16, and no one under 16 should attempt to submit any personal information to Brolly. Should we discover that any such personal information has been delivered to any of the sites, we will remove that personal information as soon as possible.

8. Use of cookies

The Brolly Service may use certain cookies, pixels, beacons, log files and other technologies of which you should be aware. [Please see our Cookie Policy](#) to find out more about the cookies we use and how to manage and delete cookies.

9. Third Party Links and Services

The Brolly Service may contain links to third party websites and services. Please remember that when you use a link to go from Brolly to another website or you request a service from a third party, this privacy notice no longer applies (except as noted at Section 4):

Your browsing and interaction on any other website, or your dealings with any other third party

service provider, is subject to that website's or third party service provider's own rules and policies.

We do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

This privacy notice applies solely to personal information collected by us through the Brolly Service and does not apply to these third party websites and third party service providers (except as noted at Section 4).

The Brolly Service may also contain advertisements for, and/or the opportunity for you to purchase products or services from third parties. If you would like more information about this practice and to know your choices about not having this personal information used by these companies, click here: <http://www.advertising.com/Privacy.html>

10. Transfers outside the EEA

Although our offices and servers are based within the European Economic Area (“**EEA**”), in certain circumstances we may transfer your personal information, for the purposes listed above, to our affiliates or other third parties that may be located in countries outside the European Economic Area, whose laws are not recognised by the EU Commission as providing an adequate level of protection to personal information.

In particular, we make our databases and information accessible to software developers - who may be located outside the EEA - for the purposes of building and improving the Brolly Service. This is not repetitive and concerns only a limited number of data subjects at any one time. It is necessary for the purposes of our compelling legitimate interest in developing and providing the Brolly Service.

We regularly assess all the circumstances surrounding this type of transfer and ensure suitable safeguards are in place to adequately protect your rights.

11. How long do we keep your personal information for?

We keep your personal information for as long as necessary to fulfil the purpose it was collected for. In particular we keep your personal information as long as your account remains active and may keep it for longer where we have a legal basis to do so.

12. Confidentiality and security of your personal information

We are committed to keeping the personal information you provide us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration:

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- *unauthorised access;*
- *improper use or disclosure;*
- *unauthorised modification; and*
- *unlawful destruction or accidental loss.*

All our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of

personal information, are obliged to respect the confidentiality of the personal information of all users of the Brolly Service.

13. How to access your information and your other rights:

You have the following rights in relation to the personal information we hold about you:

- Your right of access:

If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

- Your right to rectification:

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to erasure:

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

Where your personal information relates to our carrying out of activity regulated by the UK Financial Conduct Authority (or an analogous regulatory body in any other jurisdiction), we may be obliged to retain it to comply with our regulatory obligations. This will override your right to erasure and if it does so, we will inform you of this and of the specific regulatory obligation with which we seek to comply.

- Your right to restrict processing:

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- Your right to data portability:

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere.

- Your right to object:

You can ask us to stop processing your personal information, and we will do so, if we're:

- *relying on our own or someone else's legitimate interests to process your personal information unless we can demonstrate compelling legal grounds for the processing;*

- o processing your personal information for direct marketing; or*
 - o processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.*
- Your rights in relation to automated decision-making and profiling:

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and Brolly.
- Your right to withdraw consent:

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time - see Section 6.
- Your right to lodge a complaint with the supervisory authority:

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

To exercise your legal rights, the best way to notify us is by using the contact details provided in section 3 of this Notice. However you may also contact us through Live Chat within the app and we will do our best to refer your communication to the right person within Brolly within a reasonable time period.

14. Change to this privacy notice

We may make changes to this privacy notice from time to time:

To ensure that you are always aware of how we use your personal information we will update this privacy notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We may notify you by e-mail of any significant changes. However, we encourage you to review this privacy notice periodically to be informed of how Brolly uses your personal information.