



CORGI HomePlan Privacy Policy

Last updated: July 2019

Our customers are at the centre of everything we do at CORGI HomePlan. So as well as providing you with great value and excellent service, we're committed to protecting your privacy.

When we refer to CORGI HomePlan, we, us or our in this privacy policy we refer to CORGI HomePlan Ltd (registered address: 1 Masterton Park, South Castle Drive, Dunfermline, KY11 8NX).

This privacy policy is for customers of CORGI HomePlan and supplements other privacy notices we might provide to you – it doesn't replace them.

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1. OUR CONTACT DETAILS

Our Data Protection Officer (**DPO**) can be contacted using the details shown below.

If you have any questions about the way we handle your personal information, please get in touch and we'll do our best to help you:

Email: dpo@corgihomeplan.co.uk

Write to us at: **Data Protection Officer, CORGI HomePlan, 1 Masterton Park, South Castle Drive, Dunfermline, KY11 8NX**

If you have any data protection complaints, you're able to contact the Information Commissioner's Office (ICO) (www.ico.org.uk). We'd like to try and help with any concerns you may have before you contact the ICO, so please get in touch with us in the first instance.

2. WHY DO WE HAVE A PRIVACY POLICY?

We'll collect certain personal information from you when you use our website, write to us or call.

The purpose of our privacy policy is to let you know:

- how and why we collect your personal information;
- how we use and disclose your personal information (and to whom);
- how we protect your personal information; and
- your legal rights and how the law protects you.

3. CHANGES TO OUR PRIVACY POLICY

If we make any changes to our privacy policy, we'll post changes on our website and then we'll write to you to let you know.

4. DEALING WITH YOUR PERSONAL INFORMATION

4.1 COLLECTING YOUR PERSONAL INFORMATION

What will we collect?

We collect certain personal information from you, which is any information which might identify you. It does not include data where the identity has been removed (anonymous data).

The information we collect includes:

- **Contact data** (your name, email address, postal address, phone number, and any other relevant information we need in order to contact or identify you);
- **Financial data** (your bank account and payment details relating to products and services you receive from CORGI HomePlan);
- **Technical data** (internet protocol (IP) address, your login data (if we've supplied login data to you), browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website. We track technical data by using cookies - see section 4 below for more details on cookies);
- **Usage data** (information about how you use our website, products and services);
- **Marketing and communications data** (your preferences in receiving marketing from us and our third parties and your communication preferences); and
- **Special categories of data** (health and financial vulnerability data, if applicable, to allow us to provide priority service).

We also use aggregated data, in order to improve our operations and ensure we are providing you with the best service possible. All aggregated data is anonymised and doesn't reveal your identity.

It's really important that the personal data we hold about you is up to date so please let us know if your personal data changes at any time.

When will we collect it?

We (and our agents) collect certain personal information from and about you during your sign-up journey and when you get in contact with us or use our website or as part of providing our services to you.

We may also monitor and record any communications we have with you, including phone calls and emails, to make sure we are providing an excellent service to our customers.

4.2 USING YOUR PERSONAL INFORMATION

We'll only use your personal information where we're allowed to by law. Generally, this will be under one or more of the following circumstances:

- to perform our contract we have or will have with you;
- it's necessary for us to run our business and give you the best possible service;
- where we need to comply with a legal or regulatory obligation; and/or
- for marketing purposes where you have agreed to us using your personal data, see the "Marketing Information" section below for more information.

For more detail on how we use your personal information see the table at section 6 of this privacy policy.

Contacting you

We'll contact you by the method we've agreed with you.

Marketing information

When you provide your personal information to us, we'll give you the chance to choose whether you'd be happy for CORGI HomePlan and the OVO Group members (CORGI HomeHeat, OVO Energy and VCharge) to contact you with marketing information. If you choose to be contacted by CORGI HomePlan and/or the OVO Group, we may use your identity, contact, usage and profiled data to tell you about exciting new

products and services from CORGI HomePlan and The OVO Group. If you've opted to receive marketing from the OVO Group, they have the right to contact you directly.

The OVO Group includes VCharge UK Ltd, OVO Energy Ltd (trading as OVO Energy and Boost), CORGI HomePlan Ltd and CORGI HomeHeat Ltd. We (and our agents or related companies) will use your personal information for marketing purposes only if you've told us we can.

If you decide you want to change or opt-out of receiving marketing communications you can contact us via the addresses shown in Section 1 Our Contact Details.

Please note: This won't affect any marketing information we have sent you before we've received and processed your marketing preferences.

We'll contact you to remind you that you can update your preferences for receiving marketing information, or if you haven't told us what your preferences are, we might get in touch to find out. If you ask us to delete your details, we'll keep them on our 'Do Not Contact' register to make sure we do not contact you in the future.

4.3 DISCLOSING YOUR PERSONAL INFORMATION

We may allow the following types of organisations to use personal information we hold about you for the purposes set out in section 6 below, including:

- **service providers** who provide engineering services, industry data collection and aggregation, IT and system administration services;
- **marketing agencies** to provide you with information about our products and services or other products and services which may be of interest to you (provided you've given your consent) and to help manage any reward or loyalty schemes;
- **price comparison sites** which might take your details where you decide to request a quote or switch to us through that site; and
- **debt collection agencies.**
- **professional advisers** such as lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- **regulators and other authorities** based in the UK who we need to report to about what we're doing with your personal data in certain circumstances;

Our third parties who only process data on our behalf won't use your personal data for their own purposes and we only permit them to use it in accordance with our instructions and the law.

Disclosing information outside the EU

Sometimes the organisations listed above may be outside the European Economic Area (EEA), so we may pass your personal information to countries that do not have the same standards or protection for personal information as the UK. If we, our agents or our service providers do this, we'll always make sure that these organisations adequately secure your personal information.

Priority service or special needs

If we believe that you (or a member of your household) need extra care (for example, because of your age, health, disability or financial circumstances) and we have your explicit consent to do so, we may record and share this information with CORGI HomePlan Trade Professionals (those who carry out repairs and servicing) to allow us to provide priority service.

4.4 PROTECTING YOUR PERSONAL INFORMATION

We follow strict security procedures to protect your personal information. This includes following certain guidelines (for example, checking your identity when you phone us).

We strongly recommend that you do not disclose any CORGI HomePlan login details (where we have supplied these to you) to anyone.

From time to time, our website may provide hypertext links to sites which are created by individuals and companies outside of CORGI HomePlan. We do this if the site is relevant to the topic you're reading about. Whilst we always try to check that the content of these sites is suitable, we cannot take any responsibility for the practices of the companies who publish the sites that we link to, or the accuracy or relevance of the content on them.

4.5 HOW LONG WE'LL USE YOUR PERSONAL INFORMATION

We'll only retain your personal information for as long as necessary for the reason we collected it, including for any legal requirements we have to comply with.

When deciding on how long to retain your personal information for, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and any applicable legal requirements.

Details of retention periods for different aspects of your personal information are available in our retention policy which you can request by contacting us.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) and use this indefinitely, without further notice.

4.6 YOUR LEGAL RIGHTS

You have various rights in relation to your personal information. These rights are as follows:

- **request access to your personal information** - you can request a copy of the personal information we hold on you;
- **request correction of your personal information** - if any personal information we hold on you is incorrect, you can request to have it corrected;
- **request erasure of your personal information** - you can ask us to delete your personal information in certain circumstances;
- **object to processing or restrict processing of your personal information** - you may object to our processing of your personal data in certain circumstances;
- **request the transfer of your personal information** - to provide you, or a third party you have chosen, with your personal information; and
- **withdraw consent where we're relying on consent to process your personal information** - if you withdraw your consent, we may not be able to provide certain products or services to you. We'll advise you if this is the case at the time you withdraw your consent.

To exercise your rights in relation to your personal information, please contact us via the addresses shown in Section 1 Our Contact Details.

You are able to exercise your rights free of charge, but if you make unfounded, repetitive or excessive requests, we may charge you to carry these out or refuse to act on such requests.

We'll try to respond to all requests within one month. If your request is complex or if you make lots of requests, we may extend our time to respond - if this is the case, we'll let you know.

5. CORGI HOMEPLAN'S USE OF COOKIES

5.1 WHAT ARE COOKIES?

A cookie is a piece of information stored in a small file which is sent to and from web pages. They can be used to identify that you've visited websites before and some will be stored on your computer by your web browser. For full details on our Cookie Policy on www.corgihomeplan.co.uk/cookies.

6. PERSONAL DATA PROCESSING ACTIVITIES WE

CARRY OUT

We (and our agents) may use your personal information to:

ACTIVITY	TYPE OF DATA	LAWFUL BASIS
Provide our services to you, including: <ul style="list-style-type: none"> • registering you as a customer • add you to the Priority Services Register, if relevant • manage payments and charges • collect and recover money owed to us 	<ul style="list-style-type: none"> • Contact data • Financial data • Technical data • Marketing and communications data • Special categories of data 	<ul style="list-style-type: none"> • Performance of our contract with you • Necessary for us to run our business (e.g., to recover debts due to us) • Consent (to use special categories of personal data).
Carry out internal processes related to providing our services to you	<ul style="list-style-type: none"> • Contact data • Financial data • Technical data • Marketing and communications data • Special categories of data 	<ul style="list-style-type: none"> • Necessary for us to run our business and provide our services to you) • Consent (to use special categories of personal data).
Contact you to see if you would like any help if you've started but not finished the sign-up journey or have requested a quote from us	<ul style="list-style-type: none"> • Contact data • Technical data 	<ul style="list-style-type: none"> • Necessary for us to run our business (to grow our business and provide assistance to you)
Provide you with incentives or run a loyalty scheme	<ul style="list-style-type: none"> • Contact data • Financial data • Technical data • Marketing and communications data 	<ul style="list-style-type: none"> • Consent • Necessary for us to run our business (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
Send information to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> • Contact data • Marketing and communications data 	<ul style="list-style-type: none"> • Consent • Necessary for us to run our business (to grow and market our business)
Create internal reports or profiles to analyse information for forecasting and marketing purposes	<ul style="list-style-type: none"> • Contact data • Financial data • Technical data • Marketing and communications data • Usage data • Energy supply data 	<ul style="list-style-type: none"> • Necessary for us to run our business (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
Contact you for suggestions on how we can improve the way we provide our services to you (e.g., we may ask you to complete a survey)	<ul style="list-style-type: none"> • Contact data 	<ul style="list-style-type: none"> • Necessary for us to run our business (to study how customers use our products/services and to ensure we provide you with the highest level of service)
Help train our staff, including using your calls and emails as part of our quality monitoring and training processes	<ul style="list-style-type: none"> • Contact data and recordings of your calls 	<ul style="list-style-type: none"> • Necessary for us to run our business (in order to train our staff to provide you with the highest level of service)
Using data analytics to improve our website, products/services, marketing, customer relationships and experiences Cancellation by you after the first 14 days	<ul style="list-style-type: none"> • Technical data • Usage data 	<ul style="list-style-type: none"> • Necessary for us to run our business (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To administer and protect our business and to manage and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Contact data • Technical data • Financial data • Usage data • Marketing and communications data • Special categories of data 	<ul style="list-style-type: none"> • Necessary for us to run our business (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation

CORGI HomePlan Ltd is authorised and regulated by the Financial Conduct Authority under firm reference number 824122 to carry on insurance distribution.

CORGI HomePlan Ltd is registered in Scotland (No. SC358475). Registered Office: CORGI HomePlan, 1 Masterton Park, South Castle Drive, Dunfermline, KY11 8NX.

