

## Privacy Policy

We respect your right to privacy. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. This Privacy Policy should be read alongside, and in addition to, the [Terms](#) and the [Cookies Policy](#). Please read this Privacy Policy carefully.

Unless otherwise defined in this Privacy Policy, terms used have the same meaning as in the Terms.

### 1. About Us

- In this Privacy Policy, references to “we” or “us” are to IPG Retail Limited, trading as **PAPA Insurance**, a company incorporated in England and Wales (registered number 8365919) whose registered office is at B1 Custom House, The Waterfront, Level Street, Brierley Hill, West Midlands, DY5 1XH who will be the controller of any personal data processed as described in this Privacy Policy.

### 2. Use of the Website and Content

- This Privacy Policy applies only to your use of the Website and Content. Partners who provide other linking sites found on the Website may also gather information and you should consult those other parties’ privacy policies as appropriate and applicable.

### 3. Collection of Information

- When you access the Website via any means, or make a purchase through the Website, we may collect, store and use your personal information in line with this policy. We may also ask you for information when you report a problem with the Website or the Content.
- To register or make a purchase on the Website, we ask for your name and email address. When you make a purchase, our payment service provider, will also collect and process your credit card or other payment details. If you contact us, we may also keep a record of that correspondence.
- We may also collect data relating to your visits to the Website that cannot identify you but records your use of our Website and Content including, for example, details of how long you have used the Website and the Content for.
- We may also collect your computer’s IP address in order to help us tailor the service to your location.
- Finally, we may receive information about you from third parties (such as credit reference agencies) who are legally entitled to disclose that information.

### 4. Use of Your Information

- By accessing the Website via any means, you agree that your personal information may be collected, stored, used and shared by us and our partners, or Insurers we work with, for any of the following purposes:
  1. to provide, maintain, protect and improve the quality of the Website and the Content we offer, including by conducting anonymised market research, and to protect us and our users;
  2. to provide you with a personalised browsing experience when using the Website;
  3. to fulfil any contractual agreements between you and us;
  4. to send you details of our other products and services which we think may interest you, unless you opt out.

5. to tailor our advertising on social media to your use of the Website;
  6. to allow you to use the full range of features on or via our Website;
  7. to comply with legal and regulatory requirements;
- We may use your email address to send you updates about our Services.

## **5. Storage of Information**

- All information is stored on our secure servers.
- In addition, we (or Insurers acting on our behalf) may also store or process information that we collect about you. We have put in place technical and organisational security measures to prevent the loss or unauthorised access of your personal information. However, whilst we have used our best efforts to ensure the security of your data, please be aware that we cannot guarantee the security of information transmitted over the Internet.

## **6. Legal Basis for Processing Your Information**

- Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.
- However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.
- If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).
- Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of our Insurers), we will make clear to you at the relevant time what those legitimate interests are.

## **7. Disclosure of Your Information**

- We may disclose your personal information to Insurers and third parties when permitted by law including:
  1. with your consent;
  2. to our suppliers in order for them to help us provide our services to you, this includes:
    1. our provider of customer relationship management services (which allows us, for example, to send personalised email communications to you);
    2. our provider of file storage and management services if you email us directly;
    3. our payment services provider when you make a purchase to process your payment;

These suppliers' use of your personal data may be subject to their own privacy policies, which are available on their websites, and which we suggest you familiarise yourself with in the relevant circumstances set out above.

If we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or to protect our rights, property, or safety, our users, or others. This includes exchanging information with other Insurers and organisations for the purposes of fraud protection and credit risk reduction.

## **8. Data Retention**

- We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).
- When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **9. Your Rights**

- You have the following data protection rights:
  1. You can edit your personal details whenever you wish. We maintain a procedure in order to help you confirm that your personal information remains correct and up-to-date or choose whether or not you wish to receive material from us or some of our partners.
  2. In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us directly.
  3. You may unsubscribe from certain email communications by contacting us directly. You may also email us in order to access, correct, delete or update your personal information on our systems. We will answer every email as promptly as possible.
  4. Similarly, if we have collected and processed your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
  5. If you have any privacy-related questions or unresolved problems, you may contact us directly.
  6. You have the right to complain to a data protection authority about our collection and use of your personal information by contacting your local data protection authority.
  7. The Website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies. Please check these policies before you submit any personal information to these websites.

## **10. Children**

- We strongly believe in protecting the privacy of children. In line with this belief, we do not knowingly collect or maintain personal information from persons under 13 years of age, and no part of the Website is directed to persons under 13 years of age. If you are under 13 years of age, then please do not use or access the Website at any time or in any manner. We will take appropriate steps to delete any personal information of persons less than 13 years of age.

## **11. Cookies**

- The Website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website may no longer be available to you.
- For more information about cookies, including further details as to what they are and how to refuse them, please see our [Cookies Policy](#).

## **12. Updating this Privacy Policy**

- We may update or amend this Privacy Policy from time to time, to comply with the law or to meet our changing business requirements. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Any updates or amendments will be posted on the Website. By continuing to access the Website, your access and use will be subject to these updates and amendments.

## **13. Contacting Us**

- If you have any questions, comments or complaints about this Privacy Policy, please contact us using the details below:
- **Compliance Manager, Insurance Protector, Quay House, 1<sup>st</sup> Floor, The Waterfront, Level Street, Brierley Hill, DY5 1XD**