

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: Cadworks, 41 West Campbell Street, Glasgow, G2 6SE).

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

What's in this policy

1. Our Contact Details
2. Why do we have a privacy policy?
3. Changes to our privacy policy
4. Dealing with your personal information
 - 4.1 Collecting your personal information
 - 4.2 Using your personal information
 - 4.3 Disclosing your personal information
 - 4.4 Protecting your personal information
 - 4.5 How long we'll use your personal information
 - 4.6 Your legal rights
5. Automated decision-making
6. CORGI HomePlan's use of cookies
 - 6.1 What are cookies
7. Personal data processing activities we carry out

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, Temple Quay, Temple Quay, 1 Rivergate, Redcliffe, Bristol BS1 6ED**

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**
- **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 6 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).
- **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 in section 7 of this privacy policy.

Contacting you

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

Marketing information

We might send you marketing information we think you'd be interested in, about CORGI HomePlan or other companies in the OVO Group, and about our partners. We'll only do this when we have a legal justification for doing so. The information could be by email, letter, phone, or SMS. If you've opted out of receiving direct marketing from us, we won't send you any. If you choose to be contacted by CORGI HomePlan and/or the OVO Group, we might use your personal and account information (including contact details, and data about your usage and profile) to tell you about exciting new products and services from CORGI HomePlan and the OVO Group.

We might also use any personal data you've shared with us to show you digital adverts on social media, search engine results pages, or other websites. You can opt out of this advertising on the relevant platform (for example, by blocking cookies or clicking the relevant "no/reject" button on the app).

If you want to change your marketing preferences, you can let us know using the details at the top of this page. If you opt out of receiving marketing from us, we might share your personal data, including your updated preferences, with third parties, such as our marketing agencies. This is to make sure you don't receive any marketing from those third parties.

We'll delete your details if you ask us to, but we'll keep a record of your contact details (name, address and email) on our "Do not contact" register to make sure we don't contact you in future. If you take part in any of our "Refer a friend"

offers, you agree that you'll only contact anyone who's interested in hearing about our services and wants to benefit from the offer. We won't contact anyone you've sent a referral offer to unless they contact us.

Finally, if you decide to leave us, we might market our products and services to you after you've left, for up to one year. You can opt out of this at any time, either by updating your preferences, contacting us, or following following the link in the email or SMS that you receive.

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 7 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
- **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
- **Insurance underwriters** who underwrite the insurance products

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 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.
- **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. Automated decision-making

OVO uses machine learning and Artificial Intelligence (AI) for profiling, evaluation and automated decision making purposes.

We use your account data and household data to enable us to analyse patterns, trends and create predictive behaviour forecasts based on current behaviours. It enables us to tailor offers, products and services to individuals needs and profiles. This may mean that every offer or service we provide is not communicated or offered to every customer.

In relation to our Boiler Home Services cover, we also use automated calculations which enable us to make a fair and responsible decision on what pricing we can offer you based on the cost of maintaining your boiler. We'll consider:

- **your boiler make and model;**
- **the length of time you have had cover;**
- **your geographical location; your claims history; and**
- **whether non-standard system parts are required (including thermal stores and unvented cylinders).**

If your boiler is non-standard and/or you have made a claim against your product, and/or you live in a place where it costs more for us to serve you, your individual renewal price may increase.

Profiling and automated decision making for these purposes will not involve use of protected characteristics under the Equality Act 2010 such as data relating to gender, sex, religion, disability, ethnicity, marital status, age or disability.

If you would like to request a manual review of a decision made, or explanation of how a decision has been made, please get in touch.

6. CORGI HomePlan's use of cookies

6.1 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. You can find full details of our Cookie Policy here: corginhomeplan.co.uk/cookie-policy

7. 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 • Market, arrange for the sales of and carry out certain administrative activities • Process and handle complaints 	<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 	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 	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 	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	Contact data and recordings of your calls	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 	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: Cadworks, 41 West Campbell Street, Glasgow, G2 6SE.

CORGI HomePlan Ltd is part of OVO Group Ltd.



Part of the OVO Family

24.1 CS-PPG