

Privacy Policy:

How we handle your data

What personal data does Keycare hold about me?

Key Care Limited (“Keycare”) has received your personal data in relation to your Keycare insurance policy or your Recovery and Assistance cover (“the Policy”). It receives it directly from you when you take out the Policy or contact Keycare in relation to it. The personal data consists of the following (or some of it): full name and title, full address, date of birth, contact telephone numbers, email address, make and model of vehicle and vehicle registration number, and bank and credit card details. (It includes data supplied by you about any other person named on the Policy and you should make this Privacy Policy available to them.)

What does Keycare do with my personal data?

Keycare is a Data Controller in relation to the data that it processes about you. Keycare will use your personal data for any one or more of the following purposes:

- To administer the Policy;
- To communicate with you for any purpose in relation to the Policy (including renewal options) by letter, telephone, fax, email or text message.

What is Keycare’s legal basis for holding my personal data?

The legal basis of processing is:

- That the processing is necessary for the performance of the contract of insurance, namely the Policy (including sending your documents to you, dealing with any claim and administration of the Policy).
- That the processing is necessary for the purposes of the legitimate interests pursued by Keycare (including sending you a renewal notice or for any other matters arising from the Policy not covered in the bullet point above).

Additionally, on the basis of your explicit consent, Keycare may process special category data (such as information relating to your health) where this is provided to Keycare to enable you to be given any extra assistance which you may require in relation to the Policy.

Will Keycare transfer my personal data to third parties?

Keycare may transfer your personal data (including any special category data) to the Insurer which underwrites your policy and communicate with the Insurer in relation to the Policy by letter, telephone, fax or email. The Insurer may use your personal data for all purposes relating to the Policy and its underwriting and may communicate with you in relation to the Policy by letter, telephone, fax or email; they may make further disclosure to other insurance companies, reinsurers, legal advisers, loss adjusters, claims handlers and/or other organisations. For more details of how the Insurer collects, uses and stores your personal data, please refer to the “How we handle your data” section of the terms and conditions within your policy booklet. Keycare will transfer your personal data to third parties where this is necessary to administer the policy. Such third parties include locksmiths and key providers providing services under the Policy who may in turn from time to time use third parties to perform such services. They may use your personal data to provide services to you under the Policy and may communicate with you by letter, telephone, fax, email or text message in relation to the Policy. Keycare may transfer your personal data to third parties where this is necessary or desirable for the legitimate business interests of Keycare or as required by law.

Will Keycare transfer my personal data outside the UK?

Keycare will only transfer your data to third parties within the UK or (subject to any relevant legal safeguards) the European Economic Area.

How long will Keycare hold my personal data?

Keycare will update your personal data from time to time based on information received from you directly. In order to comply with tax, financial services regulations and other applicable legislation, Keycare will hold your personal data for the duration of the Policy and for six years after it ends, at which time it will be destroyed.

Will Keycare use my personal data for marketing?

Keycare may use your personal data for marketing key protection products (or other similar products) to you in circumstances where this is considered to be appropriate, including contacting you prior to the expiry of the Policy in connection with its renewal.

Updates to this Privacy Policy

From time-to-time Keycare may make changes to its Privacy Policy to take account of changes in legislation and practice. The latest version will be available at <https://www.keycare.co.uk/home/PrivacyPolicy>.

What are my rights under Data Protection Legislation?

You have the right to request from Keycare access to and rectification of personal data or restriction of processing concerning you and to object to processing. In addition, you have the right to data portability. Any questions you may have about data protection should be addressed to the Data Protection Officer at Keycare at the address below.

You have the right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk).

What is the position in relation to my location data with SmartFob?

Location information (precise details of your location via the combined location data of your device and the SmartFob) is shared with Keycare to assist in recovering the insured keys. If the separation alarm on the SmartFob is triggered manually, the last known location will be shared with Keycare. Both the SmartFob and Keycare will store only the most recent registered location so that a location history will not be kept or stored. Location information will be held securely by Keycare and used only for the purposes of the Policy. Keycare will not normally share location information with any third party, unless this is required:

- by law;
- for the operation of the SmartFob;
- to assist in the recovery of the SmartFob;
- where Keycare reasonably considers this to be in your best interests; or
- in wholly exceptional circumstances.

What is the position as regards other Smartfob data?

When you download the SmartFob app to your device, you will need to create an account with a valid email address and password. When you then activate a SmartFob using the SmartFob app, that SmartFob's unique identifier (SmartFob ID) will be associated with your account. If you choose to name your SmartFob, this information will be associated with your account. Keycare may track how, and how often, you use the services for reference and system analysis; this is to assist in making improvements. Keycare also collects information sent by your device when it is used for the services, such as your device's model, operating system type and version, and dates and times of your requests; this may be used to collect anonymous statistics for Keycare's reference and analysis. Keycare will not access any selfies that you take, and the photographs will be stored on your phone.

How do I object to Processing of my Personal Data by Keycare?

Keycare may process your personal data for the purposes of its legitimate interests and use your personal data for direct marketing, including marketing key protection products (or other similar products) to you, in circumstances where this is considered to be appropriate (including contacting you prior to the expiry of the Policy in connection with its renewal).

You have the right to object to processing by Keycare for direct marketing purposes and/or for the purposes of Keycare's legitimate interests.

If you wish to exercise this right, please contact the Data Protection Officer at the address below.

Key Care Limited

**2-3 Quayside House, Quayside, Salts Mill Road, Shipley, West Yorkshire, BD18 3ST.
Telephone: 0345 303 0550 Email: dpa@keycare.co.uk**

*Key Care Limited is authorised and regulated by the Financial Conduct Authority; registration number 309514
Registered in England and Wales under company number 01309093 Registered office: 2-3 Quayside House,
Quayside, Salts Mill Road, Shipley, West Yorkshire, BD18 3ST*

*Keycare Assistance Limited, a company registered in Republic of Ireland under company number 657005, whose
registered office is at 77 Camden Street Lower, St. Kevins, Dublin 2 (referred to in this Policy as "Keycare").
Keycare is authorised and regulated by the Central Bank of Ireland Company Registration Number C434286.*

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