

TDA Website Usage & Privacy Policy

WHO WE ARE / WHO REGULATES US

This site is owned and operated by TDA Services Inc Ltd (trading as Track Day Addicts and SORN Cover), registered in England and Wales, company Number 16050147 Registered office: Workspace House, Units 28/29 Maxwell Road, Peterborough, PE27JE.

TDA Services Inc Ltd is an authorised representative of Indigo Underwriters Limited, regulated by the UK Financial Conduct Authority (FCA) under firm reference number 1021887. Our permitted business is introducing, arranging, dealing as agents and assisting in the administration and performance of general insurance contracts.

Indigo Underwriters Limited is an underwriting agency regulated by the FCA under firm reference 514818. Indigo Underwriters Limited is a Lloyd's Coverholder with active binding authorities to various Lloyd's Syndicates. You can check these details on the Financial Services Register by visiting the FCA website, www.fca.org.uk or by contacting the FCA on 0800 111 6768 (free to call).

All references to “we”, “us”, “our” and “TDA” means TDA Services Inc Ltd and any agents acting on our behalf. We offer a range of insurance products provided by a range of companies. Our Terms of Business details the products we offer and which insurer provides each product. Our Terms of Business can be found at <https://www.tdaservices.co.uk/account>

A reference to the “insurer” or “insurers” refers to the insurance company or Lloyd’s syndicate providing an insurance quote or policy to you through our site. It also includes their agents and reinsurers. “You” and “your” means the person who wishes to use this website (“our site”) or purchase a policy through it.

For more information on our services and fees, making a complaint, our regulator or the Financial Services Compensation Scheme (FSCS), please refer to our Terms of Business.

Our contact details can be found on our ‘Contact Us’ page and our ICO number is: ZA156838.

PLEASE READ THIS DOCUMENT

This policy details our website terms of use and explains how your personal data is collected, processed and stored. Please show it to anyone else you have given information about, because it will also apply to other people named on a policy, quote or claim.

We take the security of your personal data very seriously. We will never sell your personal data and we will only pass your contact information to third parties for marketing purposes where you have given your explicit consent for us to do so. We will take all reasonable steps to protect it from unauthorised access.

It is important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal data changes by logging into your online account and updating your details, or by emailing us at helpme@tdaservices.co.uk

By providing us with your data, you warrant to us that you are over 13 years of age.

USE OF THIS WEBSITE & THIRD PARTY LINKS

This Website Usage & Privacy Policy, our site content and all communications will be in English and governed by the law of England and Wales. Any disputes will be decided only by the Courts of England and Wales.

We reserve the right to change our site and/or update this Website Usage & Privacy Policy at any time. If you use our site after we have changed the terms you will be bound by the new terms.

When using our site, you agree that you will not affect the integrity or security of the website or cause unreasonable inconvenience to us.

The rights in the designs, pictures, logos, photographs and content of our site are owned by or licensed to us and protected by copyright, trademarks and other intellectual property rights. You may not copy, reproduce, modify, distribute, republish, display, post or transmit any part of our site without our written consent. You may view or print individual pages only for your own use.

Our site contains information and articles to inform or entertain visitors. We try to ensure the accuracy of any content, however it is provided on an “as is” basis. We make no representations or warranties of any kind in respect of our site or its contents and we do not accept any liability for the use made by you of the content. The content should only be used for information purposes and you should not rely on it to make any decision or take any action.

Our site is for your personal use and is not to be used for any commercial purpose. We will not be responsible in any circumstances for your loss of profits.

We will not be liable for any damages or losses resulting from your inability to use our site. We cannot promise that the website will be uninterrupted, it is provided on an “as available” basis.

We make no representations or warranties about the accuracy, completeness, or suitability for any purpose of the information and related images on our site, which may contain technical inaccuracies or typographical errors. All our liability for any such inaccuracies or errors is expressly excluded.

Our site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit. This Website Usage & Privacy Policy applies only to our site.

Where our site provides links to external websites outside of our control, you agree that we are not responsible for their availability and we are not responsible for any content, product advertising, services or other materials on or available from these external websites.

We make no warranty that our site or external websites we link to are free from viruses. You are responsible for ensuring that you use the appropriate virus checking software. Neither we nor any of our employees or other representatives will be liable for loss or damage arising out of or in connection with the use of our site. This is a comprehensive limitation of liability that applies to all

damages of any kind, including (without limitation) compensatory, direct, indirect or consequential damages, loss of data, income or profit, loss of or damage to property in claims of third parties.

Your acceptance of this Website Usage & Privacy Policy does not affect your normal legal rights.

We reserve the right to transfer our rights under this agreement at any time.

COOKIES

It is common for Internet websites to use cookies and we may from time to time use cookies, pixel tags or action tags to store information on your computer's hard drive. Cookies help identify your computer and previously visited sites, allowing us to track marketing effectiveness (such as adverts on external websites) and collate anonymous data for analysis.

Cookies do not harm your computer, however some are essential for parts of our site to function properly. You can stop new cookies from being created or delete existing cookies in your Internet browser settings.

You can also use the 'Cookie Controller' on our site by clicking the icon on the bottom left hand corner to expand the preferences panel and turn off Analytical Cookies or Social Sharing Cookies.

Find out more by visiting: www.allaboutcookies.org

DATA PROTECTION

In order to provide you with insurance and other services, we will collect and hold personal data about you. We are required to comply with the Data Protection Act 2018 (DPA 2018) and as such hereby set out details as to how we process your data and your rights.

This policy explains how we collect, use and store your personal data. This includes any personal data given to us about other people named on a policy, quote or claim. TDA Services Inc Ltd (trading as Track Day Addicts or SORN Cover) is the data controller and we are responsible for your personal data.

If you have any questions about how we process your personal data please get in touch with us at: TDA Services, Workspace House, Units 28/29 Maxwell Road, Peterborough, PE27JE or email us at: helpme@tdaservices.co.uk

We will share your personal data with the insurers, statutory bodies, regulatory authorities and other authorised bodies. Occasionally, your personal data may be disclosed to selected third parties who are helping us to improve our services, for example, we may share your name, email address and reference number with an external review company, such as Trustpilot or Feefo, to collect your feedback.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for the purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email: helpme@tdaservices.co.uk

In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing. If you do not agree to that change in use, you must let us know as soon as possible.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

DATA WE COLLECT, ITS PURPOSE AND PROCESSING

Your personal information (“Personal Data”) means any information held about you and anyone else connected to your insurance enquiry, quote or policy that is capable of identifying an individual. It does not include anonymised data. Your personal data will be held for a reasonable time, on computer, paper file or other format, to ensure that a clear and complete history of insurance enquiries, quotes, policy records and transactions is maintained. It may also be used for research and analysis.

We may process the following categories of personal data about you:

- Communication Data that includes any communication that you send to us whether that be through a contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests, which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- Customer Data that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our website and our business.
- Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to

understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

- Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests, which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including social media adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests, which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent. You can also ask for a person to review an automated decision. You can see more about these rights at:

ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/

If you wish to exercise any of the rights set out above, please email: helpme@tdaservices.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you. If you have a complaint about the way we process your personal data please contact us.

You can also raise your complaint with the Information Commissioner's Office on 0303 123 1113 or visit ico.org.uk/make-a-complaint/

SENSITIVE PERSONAL DATA

Some of your personal data may include 'Sensitive Personal Data', such as information about health issues and criminal convictions. We and/or the insurers may use sensitive personal data to provide you with quotes, arrange and manage your insurance policy and to provide the services to you, including claims. Sensitive personal data will NOT be used for marketing purposes.

HOW WE COLLECT YOUR PERSONAL DATA

- Personal data you provide directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see the Cookies section of this policy for more details.
- We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.
- We and the insurers may research, collect and use data about you from publicly available sources (including Electoral Register, Companies House, County Court Judgements, bankruptcy, repossession information, social media and networking sites) and insurance industry registers. We may do this at any time to assist in providing you with a quote, arranging your insurance policy, making a mid-term adjustment, renewing your insurance policy, reporting an incident or handling a claim.
- We or the insurers may ask Credit Reference Agencies (CRA) to provide information to assess your application or renewal. This information helps to confirm your identity, allows us to give you a quote and decide which payment options to offer you, for example, monthly instalments.

You will see a record of this search if you request a credit report. No other organisation who may conduct credit searches will be able to see it. The search will not affect your credit record or credit rating in any way. The identities of the CRAs and the ways in which they use and share personal information are explained in more detail at experian.co.uk/crain, callcredit.co.uk/crain and equifax.co.uk/crain

- Under the conditions of your insurance policy, you must tell us about any incident, such as an accident or theft, which may give rise to a claim (even if it was not your fault) and whether or not you claimed for them. We or the insurers may check various insurance industry registers to validate your claims history or that of any other person or property associated with your insurance policy or claim. We or the insurers may search a range of registers, including:
 - Claims & Underwriting Exchange (CUE) Register run by Insurance Database Services Limited (IDS Ltd);
 - Hunter Database, run by Experian; and
 - Motor Insurance Anti Fraud & Theft Register (MIAFTR), run by Insurance Database Services Limited (IDS Ltd).

HOW YOUR PERSONAL DATA IS USED

1. Automated Decision Making

We will use your personal data to help determine the prices, policy terms, relevant products/services, when you research or ask for a quote, buy insurance, make any changes, renew or make a claim. We may also profile you based on your personal information and that provided by third parties. Profiling may be used to help determine the likelihood of a claim or policy transaction being fraudulent.

2. Insurance Administration, Renewal and Claims Handling

We will use your personal data to arrange and manage your insurance policy and issue documents and information to you. The insurers will use your personal data to assess your insurance application, handle underwriting and claims. Information may also be shared with other insurers either directly or via those acting for an insurer such as loss adjusters or investigators. If you move to a new broker or insurer, we may confirm certain details about your insurance policy to them. We will only do this if we are sure it is a genuine request. If you have given us your credit or debit card details, we may use this information to automatically renew your insurance policy unless you have asked us not to.

3. Preventing and Detecting Crime and Fraud

We and the insurers may use your personal data to detect and prevent fraudulent applications and claims. The savings we make help us to keep premiums down. We and the insurers may check your information against a range of insurance industry registers and anti-fraud databases for completeness and accuracy.

If we or the insurers suspect fraud or find that false or inaccurate information has been given to us, appropriate action will be taken, which may include passing details to fraud prevention and law enforcement agencies.

We, the insurers and other organisations, including those from other countries, may use information recorded by fraud prevention agencies to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities;
- Managing credit and credit related accounts or facilities;
- Recovering debt;
- Checking details on proposals and claims for all types of insurance; or
- Checking details of job applicants and employees.

4. Telling You about Other Products and Services (Marketing)

We will never sell your personal data and we will only pass your contact information to third parties for marketing purposes where you have given your explicit consent for us to do so. Our lawful ground of processing your personal data to send you marketing communications is either your consent or where we believe it is of legitimate interest. Under the Privacy and Electronic Communications Regulations, we may send you marketing communications if:

- You made a purchase or asked for information from us; or
- You agreed to receive marketing communications, and in each case, you have not opted out of receiving such communications since.

Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

You can ask us to stop sending you marketing messages at any time by following the opt-out or 'Unsubscribe' links on any marketing message sent to you or OR by emailing us at helpme@tdaservices.co.uk at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as policy purchases, claims, renewals, etc.

5. Profiling to Inform our Business Decisions

We will use your personal data to assist in product design, pricing, customer journeys or marketing and retention strategies.

DISCLOSURES OF YOUR PERSONAL DATA

We will never sell your personal data and we will only pass your contact information to third parties for marketing purposes where you have given your explicit consent for us to do so, however we or the insurers may need to share your personal data with the parties set out below:

- Other companies within the same group as TDA Services Inc Ltd.
- Our service providers, including IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Law enforcement agencies and government bodies that require us to report processing activities.
- When you tell us or the insurers about an incident, we or the insurers may also pass this information to the insurance industry registers referenced earlier in this policy.
- If you get a quote or buy through one of our partner or affinity associations, we may pass some of your personal data back to them (e.g. policy purchase, claims and rewards).
- Other insurers when necessary if you make a claim, to verify that the information you've provided is correct and prevent financial crime and fraud.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets. We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law.

OVERSEAS TRANSFER OF DATA

We or the insurers may process your personal data for the purposes mentioned above in countries outside of the European Economic Area (EEA). Countries outside of the EEA do not always offer the same levels of protection to your personal data; so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-U.S. Data Privacy Framework (DPF), we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

DATA RETENTION

We will keep your information for as long as is necessary to fulfil the purposes described in this policy and to comply with applicable law.

The length of time will depend on, among other things, whether or not you have reported a claim. If you do not report a claim, we will keep your information for ten (10) years after the expiry of the policy, while after reporting a claim, we will keep your information for ten (10) years after the claim is closed in accordance with the law.

When the above time limits expire, we will delete all information that can be attributed to you. However, we will continue to retain information in anonymised form. This includes some information about your car, sum insured, track, insurance premium and other calculation parameters. We always delete your name, address, registration number, etc., within the specified time limits.

DEALING WITH OTHERS ON YOUR BEHALF

If your spouse, civil partner, partner or any other person (who we reasonably believe to be acting for you) calls us and can answer our security questions, we will allow them to help you manage your insurance policy or your claims.

For your protection only you can cancel your insurance policy or change the contact address, unless we have agreed with you or, in the event of your death, the executors of your estate.

REFERRING A FRIEND

If you give us contact details of a friend or relative, for us to contact them with information or offers, you must first get their permission. We will not use their information for anything other than the purpose stated and we will never sell or pass it to any third parties for marketing purposes.

MONITORING AND RECORDING

We and the insurers may record or monitor calls for training, quality control and to prevent and detect fraud. We may also use CCTV recording equipment in and around our premises.