

## What this policy covers

Your privacy is important to us, and so is being transparent about how we collect, use, and share information about you. This policy is intended to help you understand:

- What information we collect about you
- How we use information we collect
- How we share information we collect
- How we store and secure information we collect
- How we transfer information we collect
- Other important privacy information

This Privacy Policy covers the information we collect about you. 'IWA', 'We' and 'Us' refers to Independent Warranty. We refer to our product/service as Deposit Protection and Guarantee Insurance and if you received a policy you will be referred to as the 'Policy Holder'. Companies that have joined the scheme and have valid membership are referred to as 'the member'.

This policy also explains how we use information about you. **If you do not agree with this policy, then you would need to put this in writing to the full address shown at the end of this policy**

Where we provide the Services through our 'members' it is important that you are aware that your information may be supplied to us by 'the member' or by their regulatory certification body, i.e. ASSURE, FENSA, CERTASS or Other

### What information we collect about you

We collect information about you when it is provided to us by 'the member' or regulatory certification body', when an insurance policy is required for issuing to a 'policy holder',

### Information provided to us

We collect information about you when a policy is to be issued. The information collected is minimal and pertinent to 'the policy holders' contract on which they entered with 'the member'. At this time IWA collect the following information:

Policy holder details:

- Full Name
- Address including postcode (location of the contracted works)
- Email address

We collect information about the policy holder when registered for a policy by 'the member' or 'regulatory certification body, in order to create and issue a policy. 'The policy holders' details must be held by IWA and the Underwriters for the minimum period of cover as this forms part of the FCA (financial conduct authority) regulations. As part of the FCA regulations and in order that the policy remains valid 'the policy holders details are retained for no less than the period of cover set out on the policy. Should 'the policy holder' request to be removed from the insurance database this will automatically end their policy agreement and We will not allow 'the policy holder to make any future claims against the policy they hold. To ensure that the policy does not become invalid it is important that 'the policy holder does not request to be removed from the insurance database for this purpose.

**Content you provided through our services:** The following information pertaining to 'the policy holder' is provided by 'the member' or the 'regulatory certification body' for the purpose of insurance:

- Full Name
- Full Address including Postcode
- Deposit Paid
- Date Deposit Paid
- Contract Value
- Completion Date of Contracted Services
- Email address of 'the policy holder'

Once the policy holder has received a policy and is both satisfied that the contract has been completed as set out in the original 'members' contract, and that the contract has been paid in full, 'the policy holder' can complete the reply slip on the original policy and return this to IWA for their 'insurance backed guarantee' otherwise known as an 'IBG'. It is important that 'the policy holder' confirms the details above in full in order to make a valid claim in the future and to prevent fraudulent claims.

All Names and Addresses of 'the policy holder' are automatically shared with the underwriters of the insurance to ensure complete and full cover is provided under the FCA.

**Content provided through our website:** The 'Member' can log all consumers details using our online dashboard system. Each account is username and password protected. The information registered by the 'Member' using this service can only be seen through the dashboard by the 'member' with whom you contracted and 'IWA'.

**Information you provide through regulators:** The privacy policy pertaining to how that information is provided and protected can be requested direct with the relevant 'regulatory certification body'. Once the data has been supplied to IWA for the purpose of insurance we can confirm that this information is securely logged in our system and only then provided to our underwriters to ensure validation of insurance. It must be made clear that the 'member' must make the necessary premiums payable in order to activate the policy and if you have not received a policy for the purpose of insurance then you are not a 'policy holder'.

**Payment Information:** We collect certain payment and billing information for the 'member' not the policy holder and all premiums are paid for by the 'member'.

**Your use of the Services:** We do not collect any information about persons or companies visiting our website. We may however from time to time keep track of activity to and from our website but this does not include personal information. The information may include the features you used; the pages you clicked on, how long you were on a particular page, whether you visited the website through a search engine or link direct from a 'member website' and how many times the website was visited.

**Other users of the Services:** Other users of our Services may provide information about you when they submit content through the dashboard. We also receive your email address for the purpose of insurance and may from time to time send you details or additional services provided by IWA. These services may include additional payments or direct debit payments in which case you will supply this on a separate direct debit form which is provided to our bank for validation. All payments relating to the direct debit are agreed with 'the policy holder' before payments commence and can end at any time if 'the policy holder' provide notice to IWA.

#### **How we use information we collect**

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

**To communicate with you about the Services:** We use your contact information to send communications via email and within the Services, including confirming your insurance is registered, reminding you of claims, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates and administrative messages. We send you email notifications when you or others interact with you on the Services, for example, when you contact us regarding a claim or registration process, when requesting information about a registered 'Member' or other services provided by IWA. We also provide tailored communications based on your contract through the 'member' i.e. Maintenance Service Plans or additional products which may benefit or support your original contract. For example, certain actions you take in the Services may automatically trigger a feature within the Services that IWA provide. These communications are part of the Services and in most cases you cannot opt out of them. If an opt out is available, you will find that option within the communication itself.

**Customer support:** We use your information to resolve technical issues you encounter, to respond to your requests for assistance and to repair and improve the Services.

**For safety and security:** We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

**To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

**With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services.

### **Legal bases for processing (for EEA users):**

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalised features and to protect the safety and security of the Services;
- We need to process your data to comply with a legal obligation..

### **How we share information we collect**

We make collaboration tools, and we want them to work well for you. This means sharing information with our underwriters for the purpose of FCA regulations. We share information we collect about you in the ways discussed in this policy and we are not in the business of selling information about you to advertisers or other third parties.

### **Sharing with other Service users**

When you use the Services, we share certain information about you with our underwriters the insurers of 'the policy holder'.

**Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect IWA, 'the policy holders', 'members' or the public from harm or illegal activities ie Fraud and Money Laundering, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

### **Sharing with affiliated companies**

We share information we collect with affiliated companies. Affiliated companies are companies like Certification Bodies, FCA or our underwriters. The protections of this privacy policy apply to the information we share in these circumstances.

**Business Transfers:** We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

#### **How we store and secure information we collect**

##### **Information storage and security**

We use data hosting service providers in the United Kingdom to host the information we collect, and we use technical measures to secure your data.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

##### **How long we keep information**

'The Policy Holders' details will be kept for a minimum term under our FCA obligations and regulations. This term will be for the minimum period of cover as set out on the policy itself.

**Access and update your information:** If the details of 'the policy holder' changes please write to IWA, 18 Babbage House, Kings Park Road, Moulton Park, Northampton, NN3 6LG.

**Delete your information:** Our Services require us to retain 'the policy holders' details for the purpose of insurance. If 'the policy holder' insists that IWA and the Underwriters remove their data this will automatically invalidate any insurance.

You can opt out of receiving marketing from us as described above by writing to us.

#### **Other important privacy information**

##### **Notice to End Users**

Many of our products are intended for use by organisations. Where the Services are made available to you through an organisation (e.g.the 'Member'), that organisation is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to the 'Member', as your use of the Services is subject to that 'Members' policies. We are not responsible for the privacy or security practices of a 'Member' organisation, which may be different than this policy.

### **'Members' are able to:**

- restrict, suspend or terminate your access to the Services;
- access information in and about you on their registered membership account;
- access or retain information stored as part of their membership account;
- input or remove 'the policy holders' details from their registered account

In some cases, 'members' can also:

- restrict, suspend or terminate 'the policy holders' insurance with prior notice to IWA
- change the email address associated with 'the policy holders' contract;
- change the policy holders information;

If you use an email address provided by an organisation (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date.

If an administrator has not already asserted control over your account or access to the Services, you can update the email address associated with your account by informing IWA.

### **Changes to our Privacy Policy**

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on our homepage. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

### **Your right to complain**

In the event that you are not satisfied with our use of your personal data or you believe that we have not upheld your rights as a data subject, please contact us using our details set out at the end of this privacy notice.

Should you remain dissatisfied with our response, you have the right to complain to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

**IWA**  
**18 Babbage House**  
**Kings Park Road**  
**Moulton Park**  
**NN3 6LG**