

Gavin

Privacy Policy

Version: 24 January 2018

General

Protecting your data, privacy and financial details is very important to Gavin.

This policy (together with our General Terms and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand the types of information we collect from you, how we use that information and the circumstances under which we may share it with third parties. By using a Gavin mobile app, including the Website (our "**Applications**"), you are accepting and consenting to the practices described in this policy.

Information we may collect about you

We may collect and process the following data about you:

- **Information you give us:** You may give us information about you by filling in forms on our Applications or by corresponding with us by phone, e-mail or otherwise. This includes (but is not limited to) information you provide when you register to use our Applications, request a quote, sign up for coverage, make a claim, and when you report a problem with our Application. The information you give us may include your name, date of birth, address, e-mail address and phone number, financial and credit card information, payment reason, personal description, geographic location, photograph, social security number and copies of identification, address proof, property identification numbers, property details, and other documents.
- **Information we may collect about you:** With regard to each of your visits to our Application we may automatically collect the following information:
 - details of the **payments**, including the geographic location from which the transaction originates;
 - **technical information**, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - **information about your visit**, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); what you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- **Information we receive from other sources:** We may receive information about you if you use any of the other Applications we operate or the other services we provide. We also may receive information from the banks and other financial institutions you are using to make payments. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you use our Website and also allows us to improve our Website.

Uses made of the information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
 - to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
 - to provide you with information about services we feel may interest you;
 - to notify you about changes to our service;
 - to ensure that content from our Application is presented in the most effective manner for you and for your device; and
 - to comply with legal and regulatory requirements.
- **Information we collect about you.** We will use this information:
 - to administer our Application and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Application to ensure that content is presented in the most effective manner for you and your device;
 - to allow you to participate in interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our Application safe and secure;

- o to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- o to make suggestions and recommendations to you and other users of our Application about services that may interest you or them.
- **Information we receive from other sources:** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Disclosure of your information

We may **share** your personal information with any member of the Gavin group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may only share your information with business partners to the extent that this is necessary for them to help us to improve the performance of one of our processes such as claim handling.

We may **disclose** your personal information to third parties:

- in the event that we **sell or buy any business or assets**, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if Gavin or substantially all of its assets are **acquired by a third party**, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a **duty to disclose** or share your personal data in order to comply with any **legal obligation**, or in order to enforce or apply contracts and any other documents referred to on it; or to protect the rights, property, or safety of Gavin, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

Where we store your personal information

The data that we collect from you may be transferred to, and stored at, a destination outside the European Union ("**EU**"). It may also be processed by staff operating outside the EU who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your payment obligation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our **secure servers**. Any payment transactions will be **encrypted**. Where we have given you (or where you have

chosen) a password which enables you to access certain parts of our Applications, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, **the transmission of information via the internet** is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Applications; any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

We restrict access of your personal information to those employees of Gavin who have a business reason for knowing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information. We maintain physical, electronic and procedural safeguards that comply with the relevant laws and regulations to protect your personal information from any unauthorised access.

Your rights

You have the **right to ask us** not to process your personal data for Gavin's marketing purposes by contacting us at privacy@meetgavin.com.

Our Applications may, from time to time, contain links to and from the Applications of our **partner networks, advertisers and affiliates**. If you follow a link to any of these Applications, please note that these Applications have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these Applications.

Access to information

Depending on applicable laws, you may have **the right to access information held about you**. Your right of access can be exercised in accordance with the relevant data protection legislation. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Law and jurisdiction

This privacy policy and any dispute or claim arising out of the privacy policy is governed by Dutch law.

Any dispute or claim arising out of or in connection with the privacy policy will be subject to the non-exclusive jurisdiction of the courts of the Netherlands.

Contact

Questions, comments and requests regarding this privacy policy are welcome and should be addressed to privacy@meetgavin.com.