

Wagonex Privacy Statement

Thank you for taking the time to read our Privacy Statement.

Wagonex Limited, whose registered office is at Tramshed Tech, Pendyris Street, Cardiff CF11 6BH and company number 10312289 (“Wagonex”, “we”, “us”, “our”) respects the privacy of visitors to our website and is committed to the protection of their personal information.

The purpose of this Privacy Statement is to explain what Wagonex does with personally identifiable information that you provide to us via this website www.wagonex.com (the Site), such as your name, mailing address or email address, and any other information which is personal data, as defined in the **General Data Protection Regulation (GDPR)** (personal data). The sections of this Privacy Statement below explain more about how your personal data will be gathered, protected, shared and for what purposes we will use that personal data.

Binding nature

By accessing and using the Site and our services, you agree and consent to the collection, transfer, processing, use and disclosure of your personal data as outlined in this Privacy Statement.

Collection of Information

Some of our services require registration. Your registration on the Site and provision of your personal data allows us to send you information that you request or to contact you about Wagonex services on either a one-time basis or longer, provide you with tips, helpful information, product news and updates and/or seek your views on our services. Registration is optional but if you choose to withhold any personal data requested by us, please note that it may not be possible for you to gain access to certain parts of the Site or for us to provide information or services that you have requested. This Site is not intended or designed to attract anyone under the age of 18.

Data integrity

Wagonex limits the collection and processing of personal data to what is necessary to fulfill the intended purpose of requesting such data. We shall take reasonable steps to ensure that any personal data collected is accurate, complete, and current.

Consent

We hereby notify you that we propose to collect and use your personal data in accordance with this Privacy Statement when you seek to register for a Wagonex service. You may discontinue our use of your personal data if you later decide that you no longer want us to (also referred to as opting out or unsubscribing). If we wish to use this information for purposes other than those for which the data was initially collected, we will obtain your consent. We will also offer a means to opt out of receiving any further such communications.

Collection of Anonymous Computer Information

When you visit the Site, we do not collect any personal data about you without your permission. However, we do collect anonymous information about you if your computer is set to allow that type of collection. This type of information allows us to monitor traffic on the Site, evaluate customer interest and perform other market research activities, such as surveying browsing habits on our sites, including the Site. This may include the following anonymous information:

Use of IP addresses

An Internet Protocol (IP) address is a set of numbers that is automatically assigned to your computer whenever you log on to your Internet service provider or through your organisation's local area network (LAN) or wide area network (WAN). Web servers automatically identify your computer by the IP address assigned to it during your session Online. Wagonex, or third party companies acting on behalf of Wagonex, may collect IP addresses for the purposes of systems administration and analyse the use of the Site.

We also may use IP addresses to identify users of the Site when we feel it is necessary to enforce compliance with the Site's terms of use, or to protect our services, the Site or other users.

Cookies

Wagonex uses cookies on this site to allow us to analyse its use and improve the experience for visitors to the Site. Cookies are tiny files, composed of a string of letters and numbers, placed on your computer by web page servers.

What personal information we collect

We collect the following types of personal information about you so we can complete the activities explained in "How and why we use your information:"

Personal details

Your name Your email address Your postal address and country of residence Date of birth Country of birth Nationality National Insurance Number Driving license details and/or DVLA check code (this is temporary and expires after use) Telephone number Family, lifestyle and social circumstances, such as marital status, dependants and employment type Financial details such as direct debit or payment card information Photographs and/or video to help us manage policies and assess claims Tracking and location information if it is relevant to your policy or claims and in some cases surveillance reports Identification checks and background information about you we need to collect in order to

assess the risk to be insured including previous claims information, data relating to your health and criminal convictions. Medical information if it is relevant to your policy or claim Accessibility details if we need to make reasonable adjustments to help Business activities if it is relevant to your policy or claim Credit history, credit score, sanctions and information received from various anti-fraud databases about you

How we collect personal information

We may collect personal information from various sources including you or from publicly available sources. We also collect information from other persons or organisations, for example:

Credit reference and/or fraud prevention agencies Emergency services, law enforcement agencies, medical and legal practices Insurance industry registers and databases used to detect and prevent insurance fraud, for example the Claims and Underwriting Exchange (CUE) Insurance investigators and claims service providers Service providers who provide the service for our products Other involved parties, for example; claimants or witnesses.

If you do not provide the personal information necessary or withdraw consent for processing of your personal information, where this personal information is necessary for us to provide our services, we will not be able to provide our service to you.

Who do we share your information with

We may share your information with third parties, including our product and service suppliers, agents, other insurers, reinsurers, parties involved in handling a claim, fraud prevention agencies and the police and government bodies if we believe that this is reasonably required for the prevention and detection of crime and fraud. This assists in keeping your premiums low.

We may also share your information with other companies within the Complete Cover Group which

administer policies on our behalf or with prospective buyers or purchasers in the event Complete Cover Group Limited wishes to sell all or part of its business.

We may pass your details and any information or documentation you provide to us to the recognised centralised insurance industry registers and databases, credit reference agencies, and policy and claims checking systems. Data may also be released to third parties if we are required to do so under the terms of a court order, for regulatory purposes or in the investigation and settlement of a claim or a complaint.

We will only share your information in compliance with data protection laws.

How long will we keep your information

We will only hold your information for as long as necessary to administer the policy, manage our business or in order to comply with legal or regulatory requirements. This will be in line with our data retention policy.

Use of Your Personal Data

We will use your personal data in the following ways: to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information 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; and to provide you, or permit selected third parties to provide you, with information about services we feel may interest you.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form or registration form); to notify you about changes to our goods or service; and to ensure that content from our site is presented in the most effective manner for you and for your computer/device.

How and why we use your data

What we do	What data
is used	

How is the data used	Why is the data used
	Determine your suitability for a Wagonex subscription

- Address - Date of birth - Driving License - Insurance claim history - DVLA penalty points - Motoring offences history - Criminal convictions history - Employment type
- Affordability assessment - Insurance requirement verification - Sanctions check - DVLA license database check

To establish and maintain our contract with you and validating the information provided to us, to assess your suitability to hold a Wagonex insurance policy, providing quotes for personal insurance

Process your booking and establish automated payments and refunds where appropriate

- Payment card details - Bank account details
- Establishing automated payments for your subscription

To establish and maintain our contract with you

- Full name - Payment card details - Bank account details - Telephone number - Address - Driving License
- Establishing

Fraud and money laundering detection

payments automated

for To and prevention, credit management

your and crime prevention

subscription - Third party background checks

establish and maintain our contract with you, preventing financial crime to meet our legal obligations

Establish quick and reliable communication between you and Wagonex, including marketing emails if opted in, notification of any changes to your subscription or account status, contract and insurance renewals,

To establish and maintain our contract with you, verify consent for use and storage of personal data. We also encourage use of our online communication tool for any questions related to your account.

Monitoring usage of Wagonex services, investigation of complaints or potential breach of contract

- Email address - Telephone number - Address
- Contacting you via post, telephone or email
- Looking at your use of Wagonex offers
- Email address - Full name

- Looking at your use of Wagonex member perks - Looking at your account history

Analysing and research of our products and services, to maintain our contract with you

Send confirmation of your insurance policy to the motor insurance database

- Vehicle - registration

details - Full name of registered driver(s)

Sending insurance policy information to MID in line with requirements

To establish and maintain our contract with you

Sharing Your Information with Third Parties.

Wagonex will not share your personal data with third parties who are not associated entities (such as members of our group of companies – for which, see below) for their own use unless we have obtained your consent to do so. When you provide personal data to Wagonex, it will be accessible to some of Wagonex's business partners, such as companies we retain to fulfil requests for information or provide assistance on specific programs or projects. Wagonex requires third parties

to whom it discloses personal data to protect personal data using substantially similar standards to those required by Wagonex. We also require that these third parties not use your personal data for any use that is not specifically authorised by Wagonex.

There may also be instances in which Wagonex is required to share your information with third parties who have not been retained by us (directly or indirectly), such as if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of a criminal or other legal investigation or proceeding. Furthermore, in the event that Wagonex sells or buys any business assets or if Wagonex or substantially all of its assets are acquired by a third party, we may disclose your personal data to the prospective seller or purchaser. Entities receiving personal data under these conditions typically have privacy requirements that apply to their handling of your information. Personal data collected from you may also be transferred to a third party in the event that the business of the Site and the customer data connected with it is sold, assigned or transferred. In the event that such sale, assignment or transfer should occur, Wagonex would require the buyer, assignee or transferee to treat your information in accordance with this.

Monitoring of communications

We may keep a record of any communication (email, phone calls, online chat etc.) between you and Wagonex. We do this for regulatory compliance, self-regulatory practices, training of staff and crime prevention.

Sharing Information with Other Wagonex Companies or Affiliates.

The personal data that you provide to Wagonex may be shared with other companies within the Wagonex group of companies. This may mean that your personal data may be transferred to Wagonex affiliates at, and stored at, a destination outside the European Economic Area. By submitting your personal data, you agree to this transfer, storing or processing. Other Wagonex companies or affiliates that may receive your personal data will abide by substantially similar privacy

requirements relating to your personal data. Other Wagonex companies to whom we provide your personal data may use your personal data in the same way as we may. We strive to protect personal data entrusted to us no matter what country the information is stored in or transferred to, and have appropriate procedures in place to help ensure the security of your personal data.

Security of Your Information.

We use appropriate technical, administrative and physical safeguards to protect data that you provide to us from loss, misuse or alteration. Despite these safeguards, it is not possible to guarantee the absolute security of personal data. Internet transmissions, particularly email transmissions, are never 100% secure or error-free. We also caution you to guard your own computer and password against unauthorised access or use by others.

Links to Other Sites.

This Privacy Statement applies only to the Site and not to third party websites. The Site may contain links or references to other web sites maintained by third parties over which Wagonex has no control. Similarly, the Site may be accessed via third party links or websites over which

Wagonex has no control. While we aim to ensure that such websites are of a high standard, we cannot guarantee the privacy standards of web sites to which we link. This Privacy Statement is not intended to be applicable to any linked, non-Wagonex owned or operated site. Please ensure that you check the legal and privacy statement posted on each website you link to before entering any personal data.

Updating and Accessing Information.

We encourage you to update all information that you provide to us to ensure that such information is accurate and current (e.g., updating your mailing address if you move). This will help us continue to provide information that best meets your needs. The **General Data Protection Regulation (GDPR)** gives you the right to access information held about you. Your right of access to your personal data can be exercised in accordance with that Act. You can exercise the right at any time by contacting us at the address given below. All requests to update or access your information will be subject to verification of the identity of the requesting individual, to help protect your data from unauthorised access or alteration by third parties. Wagonex complies with laws and regulations applicable to the right to amend your data in our files.

Updates to Wagonex Privacy Statement.

Wagonex may update this Privacy Statement from time to time. If the changes are material, we may

post a notice on the Site but we may not always update you. We encourage you to review our Privacy Statement periodically so that you are aware of any changes. Your continued use of the Site constitutes your agreement to the Privacy Statement and any updates.

How to Contact Us.

If you have any queries about how we use your information, want to access the personal data we hold on you (subject access request) or request the erasure of your data (right to be forgotten) please contact us at help@wagonex.com.

We hope you will be satisfied with the way we handle your information, otherwise, you have the right to complain to the Information Commissioner should an issue arise. For more information please visit www.ico.org.uk.