Privacy and Cookie Policy

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1. Who we are and how to contact us

Allround Savings UK Limited, trade under the brands Allround Solutions, Allround Savings, Free Bills Check and Allround Connections.

Allround Savings UK Limited are the owner of sites <u>www.freebillscheck.co.uk</u>, <u>www.allroundsolutions.co.uk</u> and <u>www.allroundconnections.co.uk</u>. Referred to collectively as our websites in this privacy policy.

Allround Savings UK Limited (referred to as "we", "us" and "our" in this privacy policy) is the controller responsible for personal information processed by it.

It is important that you read this privacy policy carefully so that you are fully aware of how and why we use your personal information. We do not knowingly collect personal information relating to children under the age of 16 and children under the age of 16 should not use this website.

We have appointed a Data Protection Officer (DPO) to oversee our data protection and privacy practices. If you have any questions about this privacy policy or if you wish to exercise your legal rights set out in this privacy policy, please contact our DPO using the details below.

Our contact details are: Allround Savings UK Limited 8 Priory Hill Twisleton Court Dartford DA1 2EN Tel: 01883 372 737 Email: <u>help4you@allroundsolutions.co.uk</u> Our DPO's contact details are: Email: <u>data@allroundsolutions.co.uk</u>

2. Changes to this privacy policy

We reserve the right to amend or modify this privacy policy from time to time. All amended versions of this privacy policy will be posted on our website.

3. Types of personal information we collect

Depending on how you use our website and the products and services you are looking for, we may obtain the following:

- 3.1 personal information so that we can identify who you are. For example, this information may include your name and date and place of birth;
- 3.2 personal information so that we can contact you. This information may include your home address, your email address and your contact telephone numbers; and
- 3.3 behavioural and/or technical personal information. For example, this information may include details about how you browse our website and the devices and technology you use to browse our website.

4. How we use your personal information and the law

We may share your personal information with our approved partners and third-party product providers so that they can return a quote to you via our website or directly. For example, if you wish for us to obtain quotations for telecoms, we will send your personal information to our panel of approved telecom providers so that they can return telecoms quotes to you directly or via our website.

This processing of your personal information is necessary so that we can provide our services to you in accordance with our terms and conditions. If we process special category data for this purpose, we will do so only if the law allows us to and at all times strictly in accordance with the terms of this policy document.

Without processing your personal information in this way, we would be unable to provide our services to you.

We may process your personal information for the purposes of providing you with our continuous savings and consultancy services. For example, if you have previously used our consultancy service then we may process your personal information in order to obtain renewal quotes on your behalf.

We have a legitimate interest in processing your personal information for the purposes of providing you with our continuous savings and consultancy services except where our provision of this service necessitates the processing of special category data. We will only process special category data for the purposes of providing our continuous savings and consultancy services to you with your consent, if the law allows us to and at all times in accordance with the terms of this policy document.

Our continuous savings and consultancy services, such as our quotation service, means that we do all of the hard work of generating a quote for you whenever a product or service is due for renewal. We generate quotes early which often means that we secure a better price for you via our website than you might obtain yourself by generating a quote on a date which is closer to your renewal date.

If you opt-in to receive general marketing from us, we may process your personal information for the purposes of providing our general marketing to you. For example, if you opt-in to receive our general marketing, we may send you newsletters, information about our latest offers, products and promotions and more.

We will only process your personal information for the purposes of providing direct marketing to you with your consent.

All of our marketing is carefully drafted and intended always to be topical, relevant and useful for our customers.

We may process your personal information in order to send you service communications.

This processing of your personal information is necessary so that we can provide our services to you in accordance with our website terms and conditions.

Without processing your personal information in this way, we would be unable to provide our services to you.

We may process your personal information in order to detect and prevent financial crime, including fraud.

We have a legitimate interest in processing your personal information for the purposes of detecting and preventing financial crime.

It is in our legitimate interests to process your personal information in this way because financial crime negatively impacts all of us. We take our obligation to investigate, report and hence seek to prevent financial crime extremely seriously and we believe our work in this area benefits the overwhelming majority of our customers who use our services honestly.

We may process your personal information and share it with our approved partners and third-party product providers in order to verify that a sale between you and one of our approved partners or third-party product providers has taken place.

We have a legitimate interest in processing your personal information for sales validation and audit purposes.

It is in our legitimate interests to process your personal information in this way so that we can continue to provide our services to you free of charge. This means that when you buy a product or service from a third-party via our website, that third party pays us a commission instead. In order to ensure that we are fairly and properly remunerated and able to continue to provide our services free of charge, it is imperative that we are able to audit our approved partners and third-party product providers for sales validation purposes.

We may process your personal information in order to personalise or improve aspects of our service delivery and for troubleshooting and other quality control and testing purposes, including for the purposes of responding to any queries or complaints about our services raised by you, or our approved partners and third-party and product providers.

We have a legitimate interest in processing your personal information in order to ensure that we are always able to provide an excellent quality of service.

It is in our legitimate interests to process your personal information in this way so that we can provide an excellent quality of service. To do this, we regularly monitor and seek to improve our interactions with you and our approved partners and third-party product providers. This helps us to understand how we can better satisfy your needs and hence grow our business. Sometimes we may also need to access your personal information in order to resolve any queries or complaints which are made about our service. Our work in this area ensures that we can continue to provide the level of service which you have rightly come to expect from us.

We may process your personal information in order to comply with any and all legal and/or regulatory obligations to which we are subject.

This processing of your personal information is necessary so that we can comply with legal obligations to which we are subject.

We are subject to numerous laws, rules and requirements. Sometimes it is necessary for us to process your personal information in order to obey the laws, rules and requirements to which we are subject.

5. How we collect personal information

We collect personal information from you when you interact or engage with our website.

We may also collect personal information from you when you talk to us on the phone, by post or online including via email, social media and mobile device apps.

We may also engage with you and hence collect personal information from you if you choose to provide feedback or take part in any of our other market research initiatives, customer surveys or competitions, prize draws or promotions. Occasionally, we may also collect personal information about you from third-parties, or publicly available sources, as set out in section 4 above.

6. Exchanging information with third-parties

We may share personal information with, or receive personal information from:

- 6.1 approved partners and third-party product providers;
- 6.2 our approved third-party data providers;
- 6.3 our regulators, Ofgem, Ofcom, Information Commissioner's Office;
- 6.4 law enforcement and fraud prevention agencies;
- 6.5 third parties to whom we may sell, transfer or merge parts of our business, or assets, or third parties whose business, or assets we may acquire; and
- 6.6 our third-party suppliers (for example, IT software and service providers).

7. How third-parties may use personal information

We impose strict restrictions on the things that third-parties may do with personal information that we give to them. For example, such third-parties may process personal information that we give to them in order to:

- 7.1 assess your eligibility for the products or services which you have expressed an interest in;
- 7.2 determine your identity and hence carry out checks:
 - 7.2.1 with fraud prevention agencies in order to detect and prevent financial crime, including fraud;
 - 7.2.2 with credit reference agencies, which will appear as soft searches on your credit report and hence should not adversely affect your credit profile;
 - 7.2.3 with public and private higher education sources in order to verify your student or graduate status; and
 - 7.2.4 check against information they already hold about you (for example, if you are an existing member of their loyalty schemes or otherwise already known to their corporate group); and
- 7.3 conduct internal research (such as by analysing market trends and customer demographics) in order to develop the products and services which they offer; and
- 7.4 share personal information with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us

and these fraud prevention agencies, and your data protection rights, can be found at <u>https://www.cifas.org.uk/fpn</u>.

If you intend to purchase products or services from any of our approved partners or third-party product providers, you are strongly encouraged to read the terms of that partner's or third-party product provider's own privacy policy in order satisfy yourself as to the purposes for which your chosen supplier will use your personal information.

When you leave our website, you are also strongly encouraged to read the privacy policy of every website that you visit in order to satisfy yourself as to the purposes for which those third-party website owners and operators will use any personal information you give to them.

8. Communications from us

The communications we send to our customers can be categorised broadly as "direct marketing communications" and "service communications".

8.1 Direct marketing communications

We understand that some of our customers like to receive only certain types of direct marketing communications. For us, this means drawing a distinction between our renewal reminders and our general marketing which includes our newsletters and information about our latest offers, products and promotions.

Because we draw a distinction between renewal reminders and our general marketing, you can choose to receive renewal reminders but not our general marketing and vice versa. Similarly, if you tell us that you do not want to receive renewal reminders or general marketing from us, we will not send any direct marketing communications to you.

8.2 Service communications

Service communications broadly comprise of communications which:

- 8.2.1 we have a legal or regulatory obligation to send to you (such as communications which we are obliged by our regulator to send to you from time to time);
- 8.2.2 we send in connection with the provision of our services to you (such as our "best price" email, which we send to you immediately following your use of our service in order to confirm the best price for a product or service which you have compared via our website); and
- 8.2.3 we send so that we can provide services at your request.

9. Sending personal information outside the European Economic Area (EEA)

We will only ever send personal information to providers outside the EEA if those providers are required to protect personal information in exactly the same way they would be required to protect personal information if they were based within the EEA. This means that we will only send personal information to a non-EEA country if:

A. the European Commission has determined that the relevant non-EEA country affords an adequate level of protection for personal information;

- B. pursuant to agreement between us and the relevant provider based in the non-EEA country which contains data protection clauses adopted or approved by the European Commission; or
- C. we send data to the US pursuant to the Privacy Shield.

10. How long we retain personal information

We may keep your personal information for up to six (6) years following the date on which you last contacted us or only for as long as is reasonably necessary thereafter in order to:

- A. respond fully to any questions or complaints;
- B. evidence that we have treated customers fairly or satisfy some other legal, accounting, tax or reporting requirement; and
- C. establish, exercise or defend legal claims in accordance with statutory limitation periods.

11. Data security

The security of personal information is extremely important to us and hence we have put in place appropriate security measures to protect personal information from being accidentally lost, used or accessed in an unauthorised way.

When we use your information as described in this Privacy & Cookie Policy, this may occasionally involve sending your information around the world (and in particular where you are located within the European Economic Area (EEA), this includes sending it outside the EEA). By providing us with your personal information, you agree that we may transfer, store and process your information in this manner.

Unfortunately, the transmission of information via the internet is not completely secure. Although we employ security measures designed to protect your personal data, we cannot guarantee the security of your data transmitted via the internet; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

12. Your legal rights & access to your information

12.1 Right of access

You have a right to know whether we are processing your personal information. If we are processing your personal information, you also have a right to request copies of your personal information that we are processing and certain further information, including the purposes of our processing and the recipients or categories of recipients to whom we have disclosed (or will disclose) your personal information.

12.2 Right to rectification

You have the right to require us to rectify or complete any inaccurate or incomplete personal information that we are holding about you.

12.3 Right to erasure

You have a right to ask us to erase your personal information. This is also known as the "right to be forgotten". We must erase your personal information following your request, except in limited circumstances prescribed by law, such as where we need to retain your personal information in order to comply with a legal obligation, or in order to establish, exercise or defend legal claims. In these circumstances, we will restrict our processing of your personal information by putting it "beyond use". This means that your personal information is deleted from our website and retained only in a separate and restricted database, where it will not be processed for any purpose other than as detailed above. Access to this database is managed by our DPO and is strictly limited.

12.4 Right to restriction of processing

You have a right to require us to restrict processing of your personal information where:-

- 12.4.1 you believe that the personal information we hold about you is inaccurate, and we require reasonable time to verify the accuracy of that personal information;
- 12.4.2 your personal information has been unlawfully processed by us, but you do not want us to erase that personal information;
- 12.4.3 it is no longer necessary for us to keep your personal information for the purposes for which they were collected by us, but they are required by you for the establishment, exercise or defence of legal claims; or
- 12.4.4 you exercise your right to object to processing and we require reasonable time to verify whether there are any overriding grounds upon which we may rely in order to continue that processing.
- 12.5 Right to data portability

If we process your personal information with your consent or because it is necessary for us to do so in order to provide our service to you, you may require us to move, copy or transfer that personal information to you or another third party in a structured, commonly used and machine-readable format.

12.6 Right to object

You have a right to object to our processing of your personal information where we are processing that personal information on legitimate interest grounds. We will stop processing this personal information if you exercise your right to object unless there are overriding grounds upon which we may rely in order to continue that processing or unless that processing is necessary in order to establish, exercise or defend legal claims.

You also have a right to object to our processing of your personal information for direct marketing purposes. You can object to our processing of your personal information for direct marketing purposes by unsubscribing here or via the unsubscribe hyperlink in any direct marketing messages which we may send to you. We will stop processing your personal information for direct marketing purposes if you request us to do so.

12.7 Right to withdraw consent

If we process your personal information with your consent, you have a right to withdraw your consent at any time. If you withdraw your consent, we may be unable to continue to provide certain services to you, but we will inform you if that is the case.

13. IP addresses & cookies

We may collect information about your computer, including, where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our websites and to deliver a better and more personalised service.

- 13.1 They enable us to:
 - 13.1.1 estimate our audience size and usage pattern;
 - 13.1.2 store information about your preferences and thereby allow us to customise our websites according to your individual interests;
 - 13.1.3 speed up your searches; and
 - 13.1.4 recognise you when you return to our websites.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you use our websites.

The "Help" menu of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. For more information about cookies and how to stop cookies being installed or how to delete existing cookies from your hard drive visit <u>www.allaboutcookies.org</u>.

13.2 What cookies are used on our websites.

The cookies we and our business partners use on our websites are broadly grouped into the following categories:

13.2.1 Essential – Some of the cookies on our websites are essential for us to be able to provide you with a service you have requested. An example of this could be a cookie used to enable you to log into your account on our websites or which allows communication between your browser and our websites. Our cookie preference cookie described in the section "How can I reject or opt out of receiving cookies?" is also an essential cookie. You may not be able to use our websites without these cookies.

- 13.2.2 Analytics We use analytics cookies to helps us understand how users engage with our websites. An example is counting the number of different people coming to our websites or using a particular feature, rather than the total number of times the site or feature is used. Without this cookie, if you visited our websites once each week for three weeks we would count you as three separate users. We would find it difficult to analyse how well our websites was performing and improve it without these cookies.
- 13.2.3 User Cookies We use cookies to improve your experience by remembering your preferences so we know how you like to use our websites. Examples of this would be remembering you so that you are served with the same content or to remember you when you come back to our websites.
- 13.2.4 Social Sharing We use third party cookies to allow you to share content directly on the social networking/sharing sites like Facebook, Twitter or Google+. Examples would be if you wanted to "like" or "tweet" about us or our products or services. Please see our "Third Party Cookies" section below for more details.
- 13.2.5 Interest-Based Advertising You will have noticed that when you visit websites you will be shown adverts for products and services you may wish to buy. The money made by website owners for showing third party adverts on their websites often pays for the cost of running the website and therefore usually allows you to use the website without having to pay a registration or usage fee. To try and ensure that the adverts you see are relevant to you third party cookies may be used to collect information about the types of things that interest you, for example websites you visit and the geography that you are based in. Having these cookies does not increase the number of adverts you will be shown, but simply makes the adverts you see more relevant. Please see our "Third Party Cookies" section below for more details.
- 13.3 Third party cookies

Some of the cookies described in the "What Cookies are used on our websites" section above are stored on your machine by third parties when you use our websites. Third parties may also read cookies on your browser to collect information or to serve content or advertisements to you. We have no control over these cookies or how the third parties use them. They are used to allow that third party to provide a service to us, for example analytics.

For more information on these cookies and how to disable them, please see:

- 13.3.1 Internet Advertising Bureau website at http://www.youronlinechoices.com where you will be able to opt-out of receiving Interest-Based Advertising cookies from some of the third parties listed below; and/or
- 13.3.2 If you want to know more about how cookies work and how to manage or delete them, visit the World Wide Web Consortium's website: www.w3.org/Security/Faq/wwwsf2.html#CLT-Q10.

14. Complaints

You can complain to us or the Information Commissioner's Office at any time. However, we appreciate the chance to deal with your concerns so please do contact us in the first instance. Please see Contact Details listed above.

15. Changes to our privacy & cookie policy

This privacy & Cookie policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

End.

Ver: 2020 April - 01