

FLOODWISE GROUP LIMITED - PRIVACY POLICY

1. INTRODUCTION

- 1.1. In this policy "Floodwise", "we", "us" and "our" refer to Floodwise Group Limited, registered in England No. 14700868 with registered office at C/O Mjb Avanti, Office 12 Epsilon House, West Road, Ipswich, Suffolk, England, IP3 9FJ. You can contact us via various means indicated on our app and/or website including by email and telephone.
- 1.2. Floodwise Group Limited is registered with the Information Commissioner in the UK as a "data controller" - registration number: ZC048999
- 1.3. This Policy forms part of our terms and conditions, and words and phrases defined there have the same meaning here.
- 1.4. We are committed to safeguarding the privacy of any person accessing or using Floodwise's Services, whether as a Customer, User, visitor or otherwise, on any of our platforms (websites and apps). Your use of our platforms constitutes acceptance of this Privacy Policy and our terms and conditions.
- 1.5. This Policy describes the personal data that we may collect from you, how we use and process it, how long we hold it for, and how we may share it with others.
- 1.6. We may amend this Policy at any time, and the current version will always apply and is available through our app. Your continued use of and access to our platforms, or use of our Services constitutes acceptance of such amended Policy.

2. WHAT PERSONAL DATA WE COLLECT AND PROCESS

- 2.1. This section describes the types of personal data about you that we may collect and process and where it is obtained from if it is not provided by you.
- 2.2. **Contact data:** such as your name, address, email address, telephone number, age, date of birth, gender, and other personal information.
- 2.3. **Account data:** such as your account identifier, account creation and modification dates and details, platform settings, marketing preferences, and the types of data described in contact data above.
- 2.4. **Details about your home:** general information about the type and construction of your home (in respect of which Services are provided), and specific information about your home and its location that is relevant to flood risk assessment and identification and provision of appropriate flood resilience prevention equipment. This information, including the address of the property, is not personal data, and is therefore not subject to privacy obligations, to the extent that we store and use it in a way that is disconnected from any personal data about you, such as your name.
- 2.5. **Communication data:** data contained in or relating to any communication between you and us, or between you and other Users.
- 2.6. **Usage data:** data about your use of our platforms and services, which may include your IP address, location, browser and operating system details, information about your device, time and duration of visit, page views and website navigation routes, actions you take on our platforms, and other analytical information about your use of our platforms. This data is obtained from our analytics tracking tools.
- 2.7. Some of the above data may be provided directly by you or on your behalf, and we also obtain some data about you from your home insurance provider.

3. WHAT WE DO WITH YOUR PERSONAL DATA

- 3.1. We obtain, require and process your personal data for the following legitimate purposes:
- 3.2. **Delivering Floodwise's Services:** including optimising, personalising and tailoring content and communications, management of your account with us, and general operation of our platforms.
- 3.3. **Communicating with you:** including delivering our Services to you, providing information and support, dealing with queries and complaints, feedback, and managing relationships and interaction (including claims and disputes) between you and us.

- 3.4. **Marketing:** you may be able to set your preferences to opt in or opt out of certain marketing messages including news, offers and deals. If you opt out, we will still contact you with important information about your account and transactions
- 3.5. **Research, analysis and security:** monitoring, researching and analysing the use of our platforms and interactions with us (including feedback and reviews), and including to assess compliance with laws and with our terms and conditions and to investigate any infringements.
- 3.6. **Record keeping:** creating and maintaining all business and transaction records required by law, and creating and maintaining our databases, and appropriate back-ups of all records.
- 3.7. **Risk management and claims:** where necessary for assessing and managing risks, obtaining or maintaining insurance coverage, and obtaining professional advice, and for any purposes related to management of disputes and claims with us.
- 3.8. **Legal compliance:** where necessary for compliance with legal obligations or to protect your or others' vital interests.

4. SHARING YOUR PERSONAL DATA WITH OTHERS

- 4.1. We may disclose your personal data to our insurers and professional advisers so far as reasonably necessary for the purposes of managing risks, obtaining or maintaining insurance coverage, handling claims, and obtaining professional advice.
- 4.2. If you opt in to direct marketing, we may disclose your personal data to others for the purpose of co-ordinating and providing targeted marketing to you.
- 4.3. We may disclose your personal data on an anonymous basis to third party advertising providers who provide tailored advertisements based on your interests.
- 4.4. We may disclose your personal data to service providers to the extent necessary to help us provide our Services to you, such as delivery and logistics companies, and suppliers of flood resilience products, and you may receive direct communications from these service providers.
- 4.5. We will not without your consent share any of your personal information, other than information provided to us by them, with your home insurance provider.
- 4.6. We may disclose your personal data to service providers to the extent necessary to help us provide and improve our offering and pursue our business objectives, such as branding agencies, advertising partners, website hosts, marketing agencies.
- 4.7. Your personal data held in our database may be held for operational or backup purposes on our servers or those of our hosting services provider.
- 4.8. We may disclose your personal data where necessary for compliance with legal obligations, or to protect your or other's vital interests. We may also disclose your personal data where necessary to pursue or defend legal claims.
- 4.9. As referred to in 2.4 above information about your property, including the address, is not personal data, and is not subject to privacy obligations, to the extent that we store and use it in a way that is disconnected from any personal data about you, such as your name. We may use and share this non-personal data in any way we consider appropriate, including for provision of Services to any future owner or occupier of that property.

5. RETENTION AND DELETION OF PERSONAL DATA

- 5.1. We endeavour to comply with our legal obligations in relation to the retention and deletion of personal data, so personal data that we process for any purpose shall not be kept for longer than is necessary for that purpose.
- 5.2. For so long as you hold an account with us we may hold all your personal data in relation to that account, including your activities actions and transactions on our platforms, and communications with us.
- 5.3. If you close your account, or there has been no activity on it for two years, then your account will be deactivated and your personal data will then be deleted after a further three months, unless you request reactivation within that period.

- 5.4. Notwithstanding clause 6.3 we may retain transaction data as part of our business records for up to seven years after the transaction date.
- 5.5. Notwithstanding clause 6.3 we may retain usage data for operational purposes for as long as we consider appropriate.
- 5.6. Notwithstanding clause 6.3 we may retain your personal data where necessary for compliance with legal obligations, or to protect your or other's vital interest, or to pursue or defend legal claims.

6. YOUR DATA PROTECTION RIGHTS

- 6.1. As well as the right to know how your data is used (which is set out in this Policy), the most important and relevant legal rights that you have in relation to your personal data are:
- You can ask for a copy of the personal data that we hold.
 - You can request us to correct inaccurate or incomplete personal data.
 - you can ask us to erase your personal data.
 - you can ask us to restrict the processing of your personal data.
 - you can object to the processing of your personal data.
 - you can complain about our processing of your personal data.
 - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
 - You can ask us to explain any computer system process that involves your data.
- 6.2. These rights are subject to certain limitations and exceptions, and you can learn more about this and the rights of data subjects at the Information Commissioner's Office website at www.ico.org.uk.
- 6.3. You may exercise any of your rights in relation to your personal data by contacting us by email. Exercising some of these rights may stop or restrict our provision of further services to you on our platforms.

7. COOKIES

- 7.1. Our platforms use cookies for various purposes to simplify, enhance, and personalise, your user experience, and for authentication, security and analysis purposes. These cookies may be stored on your device when you visit our platforms.
- 7.2. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary, and you can find information on this on the browser websites. Blocking or deleting cookies will have a negative impact upon the usability of our platforms, and may limit the available functionality and services.