

# Data Protection Privacy Notice

This Privacy Notice contains important information to help you to understand how we collect, use and share personal data about you. The notice is intended to help you understand:

- Who we are
- How we collect and use your personal data
- How we share your personal data
- Your rights
- Other important privacy information

## Who we are

CPU Group Ltd is a company registered in England and Wales (company number 03481787). Our address is 3 Lombard Street, London, EC3V 9AA. We are an Appointed Representative of Advent Solutions Management (FRN 308751) which is authorised and regulated by the Financial Conduct Authority.

## How we collect and use your personal data

We receive your personal data from a number of sources including directly from you if you buy via a school portal; from authorised re-sellers if you buy from a store, or; from your employer if you have cover on a device provided by your workplace; through claims that you place with us either online or by telephone; emails and letters that you send to us; through telephone calls with you, and; indirectly through your insurers and our agents. You are not obligated to provide us with your personal data but without it we will be unable to provide you with our services.

We collect personal data as part of providing services to you. We may also monitor or record calls, emails, or other communications in accordance with UK Law.

We collect and use personal information about you to administer your insurance policy throughout its lifecycle. It is in our legitimate interest as we have contracted with Amtrust Europe to arrange your insurance policy. It may also be necessary to collect and use your personal data to safeguard against fraud and money laundering, and to meet our general legal and regulatory obligations.

We do not hold your personal data for the purposes of marketing to you, directly or otherwise.

The personal data we collect and use is:

- Your **first name(s)** and **surname** to identify you as the policyholder and primary point of contact in relation to any quotes generated and policies purchased or to identify you as a claimant as part of our insurance claim process

- If you have bought the policy via a school portal: your **child's school, class, first name and surname** to identify them as the recipient of the device
- Your **address, postcode, email address** and **phone number** to contact you about your insurance policy or send documentation relating to your policy or to contact you regarding an insurance claim you have placed
- Your **date of birth** to verify that you are eligible for cover under the policy, and / or to confirm your identity when you contact us
- If you pay by Direct Debit, we also collect your **bank name, account name, account number** and **sort code**
- Data about **your contact with us**, for example in phone calls, emails and letters

## How we share your personal data

It is sometimes necessary to share your personal information with relevant third parties. We may share your information with

- **Advent Solutions Management** for administering the purchase of your policy and / or for administering any claim that you have made under your policy
- **AmTrust Europe Limited (AEL)** as part of our contractual obligation to notify them of the risk they are underwriting. For more information as to how AEL process your data please see <https://www.amtrusteurope.com/en-GB/PrivacyStatementandCookiesPolicy/>
- Authorised maintainers when a device has been sent to them for repair in order for them to return the device once it's been fixed
- The Financial Conduct Authority who are our regulator

Your personal data is not transferred outside of the EEA.

We will keep your personal data for as long as is necessary for the purposes for which it was originally collected

- The longer of seven years from the expiry date of your policy or the date the last claim on your policy was settled

This enables us to help you should there be any issues relating to your policy after its expiry and otherwise meet our legal and regulatory obligations.

## Your Rights

You have the right to

- Know what specific personal data we hold on your in our records, and request a copy of that data
- Have your personal data corrected or removed if it is inaccurate or incomplete
- Have your personal data deleted from our systems
- Restrict the processing of your personal data

- Object to the processing of your personal data, for example for communication, or direct marketing
- Have your personal data transferred to another company
- Withdraw consent to having your personal information used for marketing purposes

Your personal data is not used for any automated decision making or profiling.

If you choose to restrict the processing of your personal data, we may not be able to continue to provide you with our services.

We will comply with any restriction on the processing of your personal data unless fulfilling your request would reveal information about another person, or if you ask to delete information which we are permitted or required by law to keep.

## Contact Us

If you would like a copy of some or all of the personal information that we hold about you, or to update or correct any of said information, please email us at [dataprotection@advent.global](mailto:dataprotection@advent.global) or write to the **Compliance Manager, 3 Lombard Street, London, EC3V 9AA**

## Complaints

If you would like to make a complaint about our handling of your personal data, please contact the Compliance Manager at the address and email above and we will do our best to deal with the issues that you have raised as quickly and fairly as possible. If you are still unhappy you can complain to the Information Commissioners office through <https://ico.org.uk/concerns>