



Sphere Partnership

While we have made every effort to provide accurate and up to date information on our website, the law is constantly changing and affects each person or business in different ways.

The information contained within this website is no substitute for specific advice and we will not accept liability if you rely solely on information from the website.

It is important that you read this page as it contains important information regarding accessing our website.

By accessing this website you agree to the terms and conditions set out below:

- General
- Privacy
- Content
- Downloads
- Liability
- Emails

General

This website is published by Sphere Partnership the following statements apply to this website.

This website is issued in the United Kingdom and is intended for the information and use of United Kingdom residents only.

Privacy

Penn Sphere Partnership respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

- Important information and who we are
- The data we collect about you
- How is your personal data collected
- How we use your personal data

- Disclosures of your personal data
- International transfers
- Data security
- Data retention
- Your legal rights
- Glossary



Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Sphere Partnership collects and processes your personal data through your use of this website, including any data you may provide through this website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Sphere Partnership is the controller and responsible for your personal data (collectively referred to as Sphere Partnership, 'we', 'us' or 'our' in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please [contact](#) the data privacy manager using the details set out below.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 29th May 2018 and historic versions can be obtained by [contacting us](#).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.



The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data

Includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data

Includes company address, email address and telephone numbers.

Transaction Data

Includes details about payments to and from you and other details of the services you use from us.

Technical Data

Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data

Includes your username and password, preferences, feedback and survey responses.

Usage Data

Includes information about how you use our website, products and services.

Marketing and Communications Data

Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions

You may give us your Identity / Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services
- from insurance companies
- subscribe to our service or publications
- request marketing to be sent to you
- enter a survey
- give us some feedback.

Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details

Third parties or publicly available sources.

We may receive personal data about you from various third parties, including technical data from the following parties:

- analytics providers [such as Google based outside the EU]
- advertising networks [such as Google based outside the EU]
- search information providers [such as Google based outside the EU].

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To perform our services to you including:</p> <ul style="list-style-type: none"> • Manage payments, fees and charges • Collect and recover money owed to us 	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us)
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<p>To enable you to complete a survey</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none">• Technical• Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none">• Identity• Contact• Technical• Usage• Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Sphere Partnership. for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or other transactions.

Cookies

This website uses cookies. A cookie is a small text file stored in your computer containing text data. We use cookies for certain functions to improve the usability of the website. These cookies do not contain any personal information about you. However, enabling cookies in your



web browser is necessary if you wish your selections to be remembered for future visits on the same computer. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about cookies and instructions on how to adjust your browser settings to restrict or disable cookies, see the IAB website at www.allaboutcookies.org. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in 'How we use your personal data':

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#).

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data](#)
- [Request correction of your personal data](#)
- [Request erasure of your personal data](#)
- [Object to processing of your personal data](#)
- [Request restriction of processing your personal data](#)
- [Request transfer of your personal data](#)
- [Right to withdraw consent](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Glossary

Lawful basis

Legitimate Interest

Means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract

Means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation

Means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third parties

Internal third parties

Other companies in the Sphere Partnership Group [acting as joint controllers or processors] and who are based in the UK.

External third parties

- Service providers [acting as processors] based in the United Kingdom who provide IT and system administration services.
- Insurers [acting as processors or joint controllers] including recovery agents and car hire companies. Parts Suppliers
- HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] based in the United Kingdom who require reporting of processing activities in certain circumstances.



Your legal rights

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Content

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Liability

We will not be liable for any claims, penalties, losses, damages, costs or expenses arising from the use of or inability to use, interruption or availability of, this website, its operation or transmission, computer viruses or any unauthorised access to or alteration of the website. We do not warrant that the contents of this website are compatible with all computer systems and browsers.

Emails

We do not guarantee that any email sent to us will be received or that the contents will remain private during transmission. If you are concerned about this please consider other means of communication. You are responsible for ensuring any electronic message or information you send to us is free from any virus or defect that may harm our systems in any way.