



## Tractive UK's Privacy Policy

At Tractive UK Ltd we take your privacy very seriously. The following privacy policy explains how we will use your personal information to help secure peace of mind in terms of the health and wellbeing of your pets!

### About Tractive UK – who we are

We are **Tractive UK Ltd** (hereafter “Tractive UK”) and we’re on a long-term mission to reimagine how pet insurance is underwritten and priced. Tractive UK is a wholly owned subsidiary of the Austrian company, **Tractive GmbH**. Our parent company is the global market leader and most trusted provider of GPS tracker devices for cats and dogs. This is the privacy policy for the insurance content of our Group website at [www.tractive.com](http://www.tractive.com), the insurance component of the **Tractive** mobile and web apps, and for the Tractive UK Limited business.

Our company registration number is **14278186** and our registered office address is Unit 2 Tanfield Lea Industrial Estate North, Tanfield Lea, Stanley, England, DH9 9DB. We are authorised and regulated by the Financial Conduct Authority (FCA) under firm registration number **993032**. We’re also registered with the Information Commissioners Office (ICO) under registration number **ZB460789**.

With respect to the **UK General Data Protection Regulation (GDPR)**, we are the Data Controller for all personal data that is submitted via our website and any **UK insurance component of the Tractive GmbH** apps.

We are passionate about protecting your privacy and the security of the personal data we hold, and process, on your behalf. This Privacy Policy sets out, for each specific activity conducted on our website, via any Tractive GmbH apps, and through our insurer services, what information we collect, what we use that information for, our legal basis for doing so, and what controls you have.

If you have any questions about our handling of your personal information you can email us at [insurance@tractive.com](mailto:insurance@tractive.com) and please make ‘Privacy Policy’ the subject of your email header.

From time to time this privacy policy will need to be changed and we reserve the right to do this. We will publish any updated versions on the insurance page of our Group website and the date this policy was last updated can be found at the bottom of this page.

### What information do we collect from you?

The following sections set out the personal information we collect from you for each specific activity, why we collect it, what we do with it and how long we will keep it.

In all cases we will be acting as the Data Controller.

#### If you are a Tractive UK customer:

<b>Activity</b>	Signing up to our mailing list
<b>Purpose</b>	So that we can keep you informed of <b>Tractive UK</b> news, new products and services, changes to our policies and terms and conditions, asking for your help and feedback
<b>Type of data</b>	Name and email address
<b>3<sup>rd</sup> Parties</b>	Iterable, Tractive GmbH
<b>Retention</b>	Until you unsubscribe from our mailing list
<b>Lawful basis</b>	Performance of contract
<b>Activity</b>	Creating a <b>Tractive UK</b> account
<b>Purpose</b>	To be able to provide our services to you and to contact you about our services in the context of the performance of the contract for the provision of services
<b>Type of data</b>	Name, email address and password



<b>Retention</b>	Until you deactivate your <b>Tractive UK</b> account
<b>Lawful basis</b>	Performance of contract
<b>Activity</b>	Using the <b>Tractive UK insurance service</b>
<b>Purpose</b>	To be able to provide our services to you which includes providing quotes from insurers for insurance policies, administering your policy, processing renewals.
<b>Type of data</b>	General personal details, including: Name, email address, residential address, date of birth, phone number
<b>Retention</b>	Until you deactivate your <b>Tractive UK</b> account
<b>Lawful basis</b>	Performance of contract

**Information you give to us** - we may collect, process and transmit the following personal information about you or any other person you submit information on behalf of to underwriters such as Covea Insurance plc or others. By giving us information about another person, you are confirming that you have ensured they are aware of our **Privacy Policy**, and you have their consent to do this:

**General personal details**, which may include:

- Your full name
- Your email address
- Your phone number
- The address you live at
- Date of birth

**Account sign-in information**, which may include the following as set by you:

- Username
- Password

**Details in relation to requests for quotes**, which may include:

- Information about your pets

**Communications you send to us** (*by telephone, email or otherwise*), for example, to report a problem or to submit queries, concerns or comments regarding the Website, our service, or general comments.

What we do with your data?

**If you are a customer:** we use your personal data for the following purposes:

**Providing our services to you** We need to process certain personal information to provide our services to you, which includes providing quotes from insurers for insurance policies. To deliver our services, your personal data may also be transferred to the following third parties:

- Our business partners and suppliers which include but are not limited to insurance providers and technology vendor(s) and payment processing companies
- Our rewards and discounts providers and partners;
- The Tractive GmbH group of companies, in relation to GPS tracker devices and subscription plans if appropriate.

The legal basis for us and our business partners to process your data is known in legal terms as the **performance of the contract for provision of the services**.

**Tractive Pet Cover** is a trading style of **Tractive Pet UK Ltd**  
Unit 2 Tanfield Lea Industrial Estate North, Tanfield Lea, Stanley, County Durham DH9 9DB  
Incorporated in England and Wales with number: 14278186  
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**Contacting you about our services** If you have given us your contact information, we may use these details to get in touch with you about the services we offer. For example, this might be to check if we can help you finish off an incomplete application or to email you details of offers you may be interested in.

You can opt out of this at any time either by clicking “Unsubscribe” in the footer of our emails to you or by contacting us at [insurance@tractive.com](mailto:insurance@tractive.com). You cannot unsubscribe from some communications from us because we are legally obliged to send them to you.

**Improving our services** To improve our services, we may ask for your feedback via the Tractive UK App and website.

**Customer Support and account administration** We may use your personal data to provide you with customer support or to investigate a complaint or concern that you may have about your account.

**Related products and services** We may from time to time share your data with certain recommended third-party products and services to you if they complement the Tractive UK insurance experience, including our parent company and/or associated and/or affiliated Tractive Group companies.

### Our lawful basis for processing your personal data

Under Article 6 of the GDPR we are required to tell you the legal basis under which we collect and process your data.

#### If you are a customer:

We will only collect and process your personal data in line with one of the below lawful bases:

- Performance of a contract: this is where the processing is necessary for a contract we have with you, or you have asked us to take specific steps before entering into a contract, such as providing you with a quote. This lawful basis covers the following purpose:
- Providing our services to you
- Our legitimate interests: this is where we collect and process data in accordance with our “legitimate interests”, these include:
- Improving our service
- Providing you with marketing information about our services
- Providing you with customer support and running your account
- Consent: you may be given the option to explicitly agree to sharing your data with selected third parties for marketing purposes or to sign up for related products and services. This will be via a separate notice via the website or app. **We will never assume that we have your consent unless you have explicitly opted in, and you can withdraw your consent at any time by contacting us.**
- Complying with our legal obligations: we may be required to process or share your personal data to comply with a legal obligation, such as responding to a request by law enforcement or when investigating a civil claim.

For important (*but boring*) reasons, under Article 6 of the EU General Data Protection Regulation (GDPR) we need to tell you about the legal basis under which we collect and process special category data, we also need to satisfy a specific condition under Article 9 of the GDPR. Under Article 9 of the GDPR, health information is considered special category data.

### Cookies

“**Cookies**” are small text files that are sent to your computer or mobile device by us to enable the functionality of the Tractive Services or to facilitate their use.

There are a few types of cookies you should be aware of, as shown in the following.



**Temporary Cookies** only exist as long as your browser is open and are automatically deleted when you close your browser. They exist only for the particular period of use of the Tractive services, i.e., a "session". Permanent Cookies will exist until deleted by you or your browser or their expiration.

**First-party Cookies** are set by us. Third-party Cookies are set by third parties.

**Necessary Cookies** are technically required for the operation of the Tractive Websites and Tractive Services. Non-necessary Cookies are used to improve and facilitate your use of the Tractive Services but are not technically essential. These include, for example, Cookies that are used to create personalized advertising for you.

We use the following cookies:

Necessary cookies; analytics cookies; and advertising and social media cookies.

A detailed list of the cookies we use is attached to this Privacy Policy as Schedule 1.

**Refusing Cookies.** You may reject all Cookies, except for necessary Cookies, when visiting the Tractive website, via the Cookie banner; or in your browser settings. How this works, depends on the browser you are using.

#### **Data storage and international transfers**

We take the security of your data very seriously, and all your personal data will be kept according to strict safeguards and in compliance with the UK GDPR. Your data will be stored on cloud servers within the EU and we will only store your data outside the EU when the jurisdiction in question has been assessed as compliant with the GDPR.

#### **Data security**

We take security of your data very seriously. We work hard to protect the information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of any information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, we cannot guarantee that information during transmission through the Internet or while stored on our systems or otherwise in our care will be absolutely safe from intrusion by others. When you click a link to a third-party site, you will be leaving our site and we don't control or endorse what is on third-party sites.

#### **Automated decision-making the insurance page of the Tractive Pet**

When you enter in your personal and insurance details to obtain an initial quote using the insurance page of the Tractive GmbH website or App, our technology uses this to automatically find products that might meet your needs. This does not affect your legal rights.

#### **Age Limitations**

We allow only persons who are (i) at least 16 years old; or (ii) younger than 16 years old and have consent of their legal guardian, to use the Tractive services. Accordingly, Tractive services do not knowingly collect or solicit any information from anyone under the age of 16 or knowingly allow such persons to register for the service. If you believe that we might have any information from or about a child under 16, Please contact us at [insurance@tractive.com](mailto:insurance@tractive.com).

#### **Identifying the Data Controller and Processor**

Data protection law differentiates between the "controller" and "processor" of information. In general, you are the controller of user account data and we are the processor of user account data and the controller of other information.

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## Your rights

You have the **right to be informed** over what personal data we hold and how we are using it. This information is contained within this privacy policy.

If you have consented to particular uses of your personal data, you have the right to withdraw this consent at any time.

You have the **right to “portability”** of your personal data that we have collected with your consent or in performance of a contract. This means that you can request copies of all the personal data we hold for this purpose in a structured, commonly used, and machine-readable form, and we will supply this to you free of charge on request. We will respond to these requests within 30 days, unless the request is particularly complex, in which case we will inform you of how long it will take as soon as possible.

**You have the right to request a copy** of the personal data we hold under the GDPR by making a “subject access request” to us in writing. We will comply with all valid subject access requests within 30 days, unless the request is particularly complex; in this case we will contact you within 30 days with further information. You will not be charged for making a subject access request unless we reasonably deem this to be an obviously unfounded or excessive request, in which instance you will be charged a reasonable fee based on the administrative costs of providing the information.

If some of the personal data we hold is inaccurate or incomplete, you can **request that we rectify our records** by writing to us. We will comply with all requests within 30 days unless the request is particularly complex; in this case we will contact you within 30 days with further information.

Where we are using your personal data in accordance with our legitimate interests, **you can object to further use of your data**. This objection should be based on grounds relating to your particular situation. If you object, we will stop using your personal data in this way immediately, unless there are compelling legitimate grounds for processing your personal data which override your interests, rights and freedoms (such as requests by law enforcement) or we need to process your data for the establishment, exercise or defence of legal claims. **You may always object to further use of your data for direct marketing purposes by clicking the “unsubscribe” button within marketing emails.**

You have the **right to request erasure of the personal data** we hold by contacting us. Please note that it is not always possible for us to comply with a request for erasure; for example, if we have collected data from you in performance of a contract, we cannot normally comply with a request for erasure unless we no longer have an active contract with you and the data is more than six years old.

You have the **right to restrict the processing of your personal data** in certain circumstances, such as when you object to us using your data in accordance with our legitimate interests or when you contest the accuracy of the data we hold on you.

You can exercise any of your rights by contacting us via email [insurance@tractive.com](mailto:insurance@tractive.com). Please note that we may need to verify your identity before complying with any of the above requests.

## How long we will keep your data for

We will only keep your personal data for as long as is necessary. This means that we will retain your personal data for as long as we have an active contract or business relationship with you, and after this, we will only keep your data for as long as is necessary for the purposes which it is stored. Any data shared with our business partners, and suppliers and others (as outlined on page 2 above) for the purpose of getting you quotes will be deleted after a maximum period of 30 days post you receiving a quote (if you received a quote from an aggregator), or 365 days if you received a quote directly from Tractive Pet UK (which also includes clicking through from an aggregator to our website). If you buy a policy via Tractive UK, the insurer that you buy from will not delete your data after 28 days as they will need to keep it in order to maintain and service your contract of insurance.

## What happens if you don't provide us with the information we need?

As outlined above, some of the personal data you provide to us will be used to enter into a contract with you and to comply with our legal obligations. Should you not provide us with the data we require to offer our service or request that we erase the personal data we hold, it is likely that we will not be able to deliver our services to you.



## Complaints

If you feel that we have not been complying with our obligations on data protection law or you wish to assert one of your rights, please contact us without delay by emailing us at [insurancecomplaints@tractive.com](mailto:insurancecomplaints@tractive.com). Should you be dissatisfied with our response or wish to complain to the relevant supervisory authority, you can do so by contacting the Information Commissioner's Office (ICO). Contact details for the ICO can be found on this webpage <https://ico.org.uk/global/contact-us/>. Our Information Commissioners Office (ICO) registration number is ZB460789.

**Updated 01/11/2023.**



## Schedule 1 – Cookies

Name	Purpose	Creator	Necessity	Storage Duration	Legal Basis
PHPSESSID	to provide functions across pages.	tractive.com	Functional	6 Days	Art 6 (1)(f) GDPR
PHPSESSID	to provide functions across pages.	tractive.com	Functional	7 Days	Art 6 (1)(f) GDPR
PHPSESSID	to provide functions across pages.	tractive.com	Functional	7 Days	Art 6 (1)(f) GDPR
__cf_bm	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	.help.tractive.com	Functional	29 Minutes	Art 6 (1)(f) GDPR
__cf_bm	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	.help.tractive.com	Functional	30 Minutes	Art 6 (1)(f) GDPR
__cf_bm	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	.tractive.zendesk.com	Functional	30 Minutes	Art 6 (1)(f) GDPR
__cfuid	This cookie is set by our Content Delivery Network (CDN) provider in connection with their rate-limiting policies.	.help.tractive.com	Functional	End of Session	Art 6 (1)(f) GDPR
__cfuid	This cookie is set by our Content	.help.tractive.com	Functional	End of Session	Art 6 (1)(f)



	Delivery Network (CDN) provider in connection with their rate-limiting policies.				GDPR
__cfuid	This cookie is set by our Content Delivery Network (CDN) provider in connection with their rate-limiting policies.	.tractive.zendesk.com	Functional	End of Session	Art 6 (1)(f) GDPR
__cfuid	This cookie is set by our Content Delivery Network (CDN) provider in connection with their rate-limiting policies.	.zusercontent.com	Functional	End of Session	Art 6 (1)(f) GDPR
_fbp	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	.tractive.com	Marketing	90 Days	Art 6 (1)(a) GDPR
_ga [x3]	This cookie gathers information on how users use this website, for analytical purposes.	.tractive.com	Analytics	729 Days	Art 6 (1)(a) GDPR
_ga [x6]	This cookie gathers information on how users use this website, for analytical purposes.	.tractive.com	Analytics	730 Days	Art 6 (1)(a) GDPR
_gcl_au	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	.tractive.com	Marketing	89 Days	Art 6 (1)(a) GDPR
_gcl_au	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	.tractive.com	Marketing	90 Days	Art 6 (1)(a) GDPR





_help_center_session	Preserves users states across page requests.		Functional	End of Session	Art 6 (1)(f) GDPR
_help_center_session	Preserves users states across page requests.	help.tractive.com	Functional	End of Session	Art 6 (1)(f) GDPR
_uetsid	This is a cookie utilised by Microsoft Bing Ads and is a tracking cookie. It allows us to engage with a user that has previously visited our website.	.tractive.com	Marketing	1 Day	Art 6 (1)(a) GDPR
_uetvid	This is a cookie utilised by Microsoft Bing Ads and is a tracking cookie. It allows us to engage with a user that has previously visited our website.	.tractive.com	Marketing	389 Days	Art 6 (1)(a) GDPR
_uetvid	This is a cookie utilised by Microsoft Bing Ads and is a tracking cookie. It allows us to engage with a user that has previously visited our website.	.tractive.com	Marketing	390 Days	Art 6 (1)(a) GDPR
_zendesk_authenticated	This is a flag set when a user is authenticated to display the most up to date content.		Functional	Immediate	Art 6 (1)(f) GDPR
_zendesk_session	Stores account ID, route for internal service calls and the cross-site request forgery token.		Functional	End of Session	Art 6 (1)(f) GDPR
_zendesk_session	Stores account ID, route for internal service calls and the cross-site request forgery token.	help.tractive.com	Functional	End of Session	Art 6 (1)(f) GDPR
_zendesk_session	Stores account ID, route for internal service calls and the cross-site request forgery token.	p18.zdusercontent.com	Functional	End of Session	Art 6 (1)(f) GDPR



_zendesk_session	Stores account ID, route for internal service calls and the cross-site request forgery token.	tractive.zendesk.com	Functional	End of Session	Art 6 (1)(f) GDPR
_zendesk_shared_session	Authentication cookie - set to be anonymous		Functional	End of Session	Art 6 (1)(f) GDPR
_zendesk_shared_session	Authentication cookie - set to be anonymous	help.tractive.com	Functional	End of Session	Art 6 (1)(f) GDPR
ai_session	Stores session and authorisation data	insurance-uk.tractive.com	Functional	30 minutes	Art 6 (1)(f) GDPR
ai_user	Stores session and authorisation data	insurance-uk.tractive.com	Functional	365 days	Art 6 (1)(f) GDPR
.ASPNETAUTH	Stores session and authorisation data	insurance-uk.tractive.com	Functional	End of Session	Art 6 (1)(f) GDPR
ASP.NET_SessionId	Stores session and authorisation data	insurance-uk.tractive.com	Functional	End of Session	Art 6 (1)(f) GDPR
DefaultLanguage	Stores session and authorisation data	insurance-uk.tractive.com	Functional	180 days	Art 6 (1)(f) GDPR
Wannanotification	Stores session and authorisation data	insurance-uk.tractive.com	Functional	4 hours	Art 6 (1)(f) GDPR

