

ABOUT THIS PRIVACY POLICY

EFFECTIVE DATE: 1ST SEPTEMBER 2022

This privacy policy applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.

We take the privacy of your personal information very seriously and will only use your personal information in accordance with the current data protection law in the UK and this privacy policy.

This privacy policy sets out:

- what personal data we process about you, the reason we process that personal data, our legal basis for processing that personal data, and how long we will process it for;
- who to contact in the event that you have any queries relating to your personal data;
- who we may share personal data with;
- the extent to which we transfer personal data outside the European Economic Area;
- the extent to which we use personal data to carry out any automated decision making with a legal or similarly significant effect on you as a data subject; and
- what rights you have in relation to your personal data, and how to exercise them.

WHO WE ARE, AND HOW TO CONTACT US.

Data controller, address and registered number:

We, Karzoom Limited, are the data controller.

We are a limited company registered in England under company number 12081675, with our registered office at Upton Lovell, 329 Oldfield Road, Altrincham, WA14 4QT.

You can contact us via email on support@karzoom.zohodesk.eu or by mail at the address above.

THE PROCESSING

We may collect and process the personal data set out in the table below:

- for the purposes set out in the table below;
- in reliance on the lawful basis set out in the table below; and
- for the time set out in the table below.

Type of personal data	Purpose	Lawful basis for the processing	How long we keep it
Your name, contact details, your purchase history and records of communication you have had with us.	For administrative purposes if you are a current or past customer, including to: <ul style="list-style-type: none"> • provide or manage a product or service you have asked for; and • help us to identify you when you contact us. 	Necessity to perform our contract with you. Failure to provide such data where we request it may mean we are unable to supply you with the requested product or service.	Seven years from the date on which we supply goods or services to you. If you do not purchase from us, 12 months from your last interaction with us.
	To carry out background checks in conjunction with our third-party partners for insurance purposes.	Our legitimate interest in ensuring you meet all insurance requirements, in particular to verify your identity and prevent fraud.	Seven years from the date on which we supply goods or services to you.

	<p>To help us recover debts due to us from you.</p>	<p>Our legitimate interest of recovering money due to us.</p>	<p>Seven years from the date on which we supply goods or services to you.</p>
	<p>To bring or defend legal claims.</p>	<p>Our legitimate interest of bringing or defending legal claims.</p>	<p>Where you purchased a product regulated by the FCA , ten years from the date you bought that product.</p> <p>Otherwise, seven years from the date you last dealt with us.</p>
	<p>To contact you about products and services offered by us, using one or more of:</p> <ul style="list-style-type: none"> • post, • phone, • e-mail, • or SMS <p>dependent on the permissions you have given us. Our current products and services include, but are not limited to:</p> <ul style="list-style-type: none"> • vehicle rental/subscription services • motor insurance for the purposes of the vehicle rental 	<p>Your consent.</p>	<p>Two years from the date on which you last gave your consent to marketing, although we may retain limited records to the extent required to maintain suppression lists.</p>

	<ul style="list-style-type: none"> ancillary services purchased alongside vehicle rental services 		
<p>Your purchase history.</p> <p>History about email or website content you have previously engaged with.</p>	<p>Market research, which may include customer analysis and profiling.</p> <p>To help us improve our content, products and services, which may include profiling.</p>	<p>Our legitimate interest of researching what content, products and services is/are popular, and to help us improve our content, products and services.</p>	<p>We only retain market research in an anonymised form.</p>
	<p>To identify other products or services you might be interested in for the purpose of direct marketing, which may include profiling.</p>	<p>Consent</p>	<p>Seven years from the date on, which you last gave your consent to marketing, although we may retain limited records to the extent required to maintain suppression lists.</p>
<p>Your IP address, the web site from which you visit us, the web pages you actually visit and the date and length of your visit.</p>	<p>To help us secure and manage the performance of our websites.</p>	<p>Our legitimate interest of securing and managing the performance of our websites.</p>	<p>This data is only stored anonymised.</p>
<p>Your name, contact details, and personal documents enabling us to prove your identity, which may include your passport, driving licence, and / or national insurance number.</p>	<p>To help us detect and prevent fraud.</p>	<p>Our legitimate interest of preventing loss.</p>	<p>Seven years from the date on which we supply goods or services to you.</p>

Where multiple retention periods apply to one category of data, the retention period will be the longest one (although we will stop using that category of data when the retention period for that purpose expires).

With regards to the items with a grey background either: (a) you may have the right to object to processing; or (b) you have the right to withdraw your consent. For details on how to exercise either, please see the section below titled "Withdrawing your consent and/or objecting to our processing".

WITHDRAWING YOUR CONSENT AND/OR OBJECTING TO OUR PROCESSING

Where we originally relied on consent to process your personal data, you will always have the right to withdraw that consent.

Similarly, where we originally relied on our legitimate interests to process your personal data, you always have a right to object to our processing of that personal data. However, we do not have to stop processing that personal following your objection where we are able to demonstrate either:

- we have compelling legitimate grounds to process that personal data which override your interests, rights and freedoms; or
- we require to data for the establishment, exercise or defence of legal claims.

Your right to object to legitimate interests processing is however absolute if it relates to processing for marketing purposes.

We highlight where these rights apply in the table of data processing activities above, and in this paragraph, we provide detail of how to go about withdrawing your consent or objecting to our legitimate interest processing.

[Withdrawing your consent to direct marketing, or objecting to our legitimate interest processing for direct marketing purposes](#)

Below we set out the easiest way to withdraw your consent to, or opt-out from, marketing communications.

You can always contact us by email at support@karzoom.zohodesk.eu or by writing to us at: Karzoom Limited, Upton Lovell, 329 Oldfield Road, Altrincham, WA14 4QT.

1-09-22 Website Version

- If we are not yet processing your personal data (i.e. because this is your first contact with us):

You can opt out of receiving marketing communications from us by ticking the appropriate box on the form which you complete (whether on our website or via a paper form), or by contacting us at any time using the details set out above.

- If you previously opted-in to marketing or did not opt-out at the time you gave us your details (as the case may be):

You can withdraw your consent or opt-out by clicking the unsubscribe link which we include on all of our electronic marketing communications, or by contacting us at any time using the details set out above.

Objecting to non-marketing legitimate interests processing

To object to any of our non-marketing processing based upon our legitimate interests (as highlighted in the processing activities table above), please contact us using the contact details as provided in this policy.

WHERE WE OBTAIN YOUR PERSONAL DATA FROM

We obtain personal data from the following sources:

- you, for instance where you contact us about, or purchase, one of our products or services;
- ourselves, for instance where we generate data about you (for instance an insurance decision based on other personal data, or a data relating to the products or services we think you might be interested in);
- occasionally from other third parties who may lawfully pass to us information about you, but never for marketing purposes;
- if you apply for a position with us; and
- publicly available sources.

PERSONS WITH WHOM WE MAY SHARE YOUR DATA:

In general, access to your personal data will be restricted to those who have a need to access it in order to carry out their duties (for example, our customer service teams and finance teams).

However, we will also share your personal data with the following external third parties, and our Dealer Partners, in some circumstances:

- regulators and government authorities such as HMRC or the police, if we are required to do so by law or if the regulator or authority requests it and we regard that request as reasonable;
- fraud prevention agencies or other third parties that assist us in preventing fraud or loss;
- our insurers, legal advisers or other third parties who need access to it in the context of managing, investigating or defending actual or potential claims or complaints. Specifically, we share information with Extracover Limited (trading as Zego), their reinsurers (their own insurers) and specific other organisations for these purposes;
- a potential purchaser of one of our businesses;
- our Dealer Partners who provide their Vehicles as part of providing Vehicle Subscription Services to you;
- third party organisations where you have agreed that we may do so, typically for purchasing a product offered by that third party (e.g. a motor vehicle); or
- organisations that process your data on our behalf which are not allowed to use your data for any other purpose (which include, for instance, marketing agencies or data management firms).

TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA

In certain limited circumstances, we may export personal data outside of the European Economic Area for processing, and we may use third party service providers who do the same.

We only do that if there is a good reason to do it and where adequate safeguards (such as the appropriate contractual arrangements with suppliers, or adequacy decisions, depending on the destination country) are in place.

YOUR RIGHTS (WITH EFFECT FROM 25 MAY 2018)

The law gives you certain rights in respect of the personal data that we hold, which you should be aware of:

- You have the right to obtain your personal data from us except in limited circumstances. Where we provide it, the first copy will be free of charge, but we reserve the right to charge a small fee for additional requests.
- You have the right to require us to rectify any inaccurate personal data we hold concerning you.
- Taking into account the purposes of the processing, you may also have the right to have incomplete personal data completed, by means of providing a supplementary statement or otherwise.
- You have the right to require us to erase your personal data on certain limited grounds (including where they are no longer necessary for the purpose for which they were collected or where you withdraw your consent and there is no other legal ground for the processing).
- Where we process personal data either on the basis of consent or contractual necessity, you provided the personal data to us, and we process that personal data by automated means, you have the right to require us to give you your data in a commonly used electronic format.
- You have the right to object to our processing of personal data which we process on the grounds of our legitimate interests, although we do not always have to honour your objection. For more information see the section above titled "Withdrawing your consent and/or objecting to our processing".
- You have the right to require us to restrict the processing of your personal data on certain grounds, including where:
 - you contest the accuracy of the personal data and want us to restrict processing of your personal data while we verify its accuracy;
 - the processing is unlawful, but you request a restriction of the processing rather than erasure;
 - we (as controller) no longer need the data for the purposes of the processing, but you have told us you require us to retain that personal data for you to establish, exercise or defend legal claims; or
 - you have objected to us processing your personal data on grounds of legitimate interests and want us to restrict processing of your personal data while we consider your objection.

If you would like to exercise any of these rights, please contact us using the details set out at the top of this policy.

IF WE CAN'T REMEDY AN ISSUE YOU HAVE

Should you have any complaints or issue with our treatment of your personal data, you may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk>).

KARZOOM LTD INTERNET SITES:

We try to keep our websites secure. However, you recognise when providing your information to us through our websites, or when you send us or ask us to send you any of your confidential information by email, that the internet and email communications over the internet may not be secure. We cannot be responsible for any loss or unauthorised interception of information transmitted via the internet, which is beyond our control.

Our internet sites may contain links to other websites outside of our company. Our privacy policy only applies to our website. We are not responsible for the content, privacy or security of other websites.

When you visit our web sites, our web server automatically records your IP address, the web site from which you visit us, the web pages you actually visit and the date and length of your visit.

USE OF COOKIES ON KARZOOM LIMITED INTERNET SITES:

A 'cookie' is a piece of information that a website transfers to the cookie file of the browser on your computer's hard disk, so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the 'lifetime' of the cookie, and a value, usually a randomly generated unique number.

When you visit our internet sites we may send you a cookie. We may use cookies in the following ways:

- to help us recognise you as a unique visitor (not just a number) when you return to our website and to allow us to tailor content of our site to match your preferred interests, including any 'favourite vehicles' or 'vehicle comparisons' you may save; and
- to compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website. We cannot identify you personally where we use cookies in this way.

Two types of cookies may be used on our internet sites:

- session cookies, which are temporary cookies that remain in the cookie file of your browser, usually until you close your browser; and
- persistent cookies, which remain in the cookie file of your browser for longer, (how long will depend on the lifetime of the specific cookie).

DISABLING/ENABLING COOKIES:

You can accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our websites if cookies are disabled.

You can find information on how to disable or enable cookies by visiting www.allaboutcookies.org.