

TRIP DATA AND PRIVACY POLICY

How personal information is collected & held

We collect your personal information when you contact us, use our online services, enter our promotions, participate in marketing initiatives, deal with our business partners and insurance intermediaries, including aggregators.

Your personal information is recorded in our systems and databases and is held in secure environments. We may use our related bodies corporate, agents and third-party suppliers for data storage services, which are all located in Australia.

Any personal information you provide over the internet is held securely. We use service providers and secure online payment facilities so you can pay us by credit or debit card. Your details can't be accessed through the internet after your payment has been processed.

When you visit our website we use common internet technologies, such as cookies, to collect general statistical information and to assist you in using our online services. We don't collect personal information from cookies or use them for marketing purposes.

Your driving, trip or journey data

In sharing samples of your journey data with us, via the use of our driving application known as the Carpeesh driver safety app available on Android and Apple phones ("driver safety app"), we explain here how the information is collected and used to provide insights to you and form part of your rating for premiums. At the same time we use your data to provide important road safety messaging to you and support the needs of the insurance product you have chosen, including reporting of claims.

We're committed to safeguarding your privacy and the confidentiality of your information. This Privacy policy sets out how we collect, use, disclose, transfer and store personal information that you provide to us via your use of our driver safety app. Please read this privacy policy carefully.

All your journey information is processed in an encrypted and de-personalised form, meaning none of our partners or members of the public can access digitally your journey or trip data. Our computer systems only search for driving behaviour information and relevant information for insurance purposes, such as the regular address the car is garaged overnight and a trend of how the car is driven.

We use a variety of security measures, including sophisticated encryption and authentication tools to maintain the safety of your personal information. Your trend score only is securely transmitted to the insurance system and only data relating to an incident when we are assisting you with a claim is viewed by us.

You understand that by using our driver safety app it is possible to identify a location and the speed at which you are travelling. By using our driver safety app you agree and accept that you have voluntarily chosen to share this personal information with us.

When you use our driver safety app you should be aware it will record the direction you are heading, date, time, latitude, longitude and speed and that this information is collected and stored by us or by an associated entity on our behalf.

The driver safety app requires access to the mobile location data as it is used to collect trip details. Location permission settings must be enabled for the driver safety app to function in order to record information about your driving.

We will not release your information to anyone else, unless there is court supported documentation we must comply with. This includes the government and authorities such as the police or road authorities.

We do not on-sell your journey information to any third party or allow access by any third party unless they are supplying services to us in the course of fulfilling our obligations in your insurance policy.

Your own data is not used against you in claims unless it supports other compelling evidence of fraud or information that leads us to believe you may have misrepresented the truth.

Your journey data is not displayed in any part of our websites or in any report that we produce. Driving feedback and tips are provided in your driver safety app from the aggregate of the trip or journey data represented by a DrivePoints rating.

We record your phone number when you send it to us or make a call or send a text message or SMS to Carpeesh. We will associate it with your account. When you link our driver safety app we will generate a user account based on your device and hardware so if you change your device or hardware, you may have to re-associate this new device or hardware with your account before you can continue to use the driver safety app.

The driving data recorded through your use of our driver safety app is stored on your phone using encryption. This data is then transmitted over the internet using a secure sockets layer and then stored in our secure data warehouse and is only accessible by a limited number of persons who have special access rights to such systems for specific purposes and are required to keep the information confidential. Data may be limited to the insured vehicle when the driver safety app is paired with a bluetooth beacon.

What data is captured by Carpeesh?

For the purposes of providing you with your Car Insurance Policy, you are asked to download the Carpeesh driver safety app to record information about the way your car is driven. The driver safety app uses telematics to enable us to recognise certain aspects of your driving to ensure that the premium reflects your car's usage. All of our driver safety appointed service partners will process this information securely.

An electronic data feed will translate the co-ordinates from the location that will provide detail regarding various information including road type, road surface and speed limit of the road you are driving on at any specific time. This information will be used to build up a profile of how, where and when your vehicle is driven.

How will Carpeesh use and/or disclose the data?

Carpeesh will use the data for the purpose of providing you with your policy and ensuring that you are paying a premium that is reflective of your driving style. Your information, including the driving data, will be used for the following purposes:

- To indicate the car's usage.
- If you make a claim under your policy, to help provide further clarification as to the circumstances of the claim, such as time of day, location and the speed the car was travelling.
- To help us to understand driving behaviours and to provide private feedback to you or any other drivers you give permission to see.

Carpeesh and its sister company Urban Analytica will process your personal data in accordance with our responsibilities. Personal insurance data related to premium setting will only be processed by Carpeesh for the purposes outlined below. Carpeesh shall only provide information about you to those legally entitled to it, and where we are obliged to release it.

Who we may disclose your personal information to?

We, or our agents, may disclose your personal information to:

- Any person authorised by you.
- Our related bodies corporate, including any underwriter we are authorised to act as their agent under our Australian Financial Services Licence (AFSL) and under the underwriters binding authority for the issues or insurance policies, policy administration, compliance, claims and reinsurance purposes.
- Mail houses, records management companies or technology services providers for printing and/or delivery of mail and email, including secure storage and management of our records.
- Financiers of any car you insure with us to confirm your policy is current, or when your car is a total loss to confirm they have a current interest
- Medical practitioners or health care in the case of an emergency
- Organisations that provide banking or transactional services to facilitate payments to and from us.
- Comparison services who arrange the sale of our insurance products.
- Other insurers to obtain information about your past insurance history, including to confirm a no claim bonus status, to assess insurance risk or assist with an investigation.
- Dispute resolution organisations such as the Australian Financial Complaints Authority (AFCA) or Office of the Australian Information Commissioner (OAIC).
- Service providers, such as Urban Analytica and actuaries that perform data analytics for premium rating, road safety and driving performance, incident and claims data. This includes analytics on aggregate de-personalised data on road safety to support improved road safety in our community.
- Companies that conduct customer surveys on our behalf, and
- Insurance reference bureaus to report claims you make with us.

We may also disclose selected personal information to

Repairers and suppliers to repair or replace your car or parts. Investigators and assessors to assess your claim and matters related to it. Lawyers and recovery agents, to defend an action by a third party against you, to recover our costs (including amounts you owe us) or to seek a legal opinion on matters related to products or services you have with us

Witnesses, to obtain witness statements, and Police or relevant authorities where criminal actions arise such as fraud, theft or reports obtained on drink or illicit drug substance has been detected in relation to a claim.

Other parties to a claim to obtain statements from them, seek recovery or defend an action. If you have specifically selected a Grey Fleet Worker product, then you agree that your driving scores will be shared with your employer who facilitated your access to purchase this type of product.

What rights you have over data

If you are a customer of Carpeesh and have an active smartphone driver safety app, you can directly access your last journeys on your own phone. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes. You cannot readily access another driver of your car's data, unless they choose to share it with you on their smartphone. We do not respond to requests for or provide trip or journey data to customers or anybody else on request, for whatever reason, in order to protect the privacy of each and every user. Where you drive is your business, we are interested in how you drive to support the services of the insurance product you have chosen.

How our suppliers use your data

Firstly, all our suppliers have servers in Australia and no data is processed offshore. Non-personal information collected by the driver safety app and some generic information provided by you at the point of driver safety application, such as age, gender, State, make, model and engine size of the car will also be used by our suppliers for research purposes both during the period of insurance and after the policy has ceased. This aggregated data is used for pricing and portfolio management purposes, to assist with continual improvement of our product and the development of other products and services.

Any information such as your name, address, and vehicle registration number, will be removed after cancellation and this will restrict further data being directly linked to you.

When you cancel your policy with Carpeesh, we remotely switch off any data collection from the driver safety app, even if you have not deleted it from your phone, so no further transmission of data can take place.

Please show this notice to any named driver on your insurance policy and any other person who drives your car.

Our contact details

We welcome questions, comments and requests regarding this Trip Data & Privacy Policy. If you want to provide feedback or require more information about how we protect your personal information, please contact us on help@carpeesh.com

We reserve the right to update this Trip Data and Privacy Policy at any time.