



Carpeesh

Trip Data and Privacy Policy

We respect your right to privacy and take seriously the protection of your personal information and are bound by the Australian Privacy Principles which are set out in the *Privacy Act 1988 (Cth)* (the Act).

Carpeesh Pty Ltd (ACN 630 295 368, AFSL 516350) collects information in order to provide car insurance products and associated DrivePoints rating and driver safety services. Urban Analytica Pty Ltd (ACN 626 183 793), provides a dedicated telematics service to collect and process the driving data to be meaningful for insurance rating purposes and to provide driver safety feedback.

We're committed to safeguarding your privacy and the confidentiality of your information. This Trip data and Privacy Policy sets out how we collect, use, disclose, transfer and store personal information that you provide to us via your use of our Carpeesh driver safety app ("app"). Please show this notice to any named driver on your insurance policy and any other person who drives your car.

How personal information is collected and 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. Our suppliers, including actuaries and insurance sales channels have servers in Australia and no insurance or driving data is processed offshore.

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.

How Carpeesh collects and holds personal information

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

- All your journey information is processed in an encrypted form by Urban Analytica, meaning none of our other 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 two-factor 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 app you agree and accept that you have voluntarily chosen to share this personal information with us.

- 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 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 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 app.

The driving data recorded through your use of our 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.

What data is captured and held 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 you drive. The driver safety app uses telematics to enable us to recognise certain aspects of your driving to ensure that the premium reflects this. All of our 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 you drive.

The app uses telematics to enable us to recognise certain aspects of your driving to ensure that the premium reflects your driving. When you use our app you should be aware that our app will record the direction you are travelling, date, time, latitude, longitude and speed, how you manoeuvre the car and that this information is collected and stored by us or by an associated entity on our behalf.

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 estimate the insured 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.

Urban Analytica collects and processes your driving data on behalf of Carpeesh. 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.

Anonymity or pseudonymity relevant to Urban Analytica's research and personal information handling

Non-personal information collected by the driver safety app and some generic information provided by you at the point of application, such as age, State, make, model and engine size of the car will also be used by our suppliers for road safety 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 for road safety purposes.

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 app, even if you have not deleted it from your phone, so no further transmission of data can take place.

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 for administrative, actuarial, 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
- Aggregator services who arrange the sale of our insurance
- 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 AFCA
- Service providers that perform data analytics
- 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 investigate and 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.

Accessing your personal information

The information that you responded to our underwriting questions is included in the Policy Certificate you receive when you buy a policy, make any policy change or at renewal. Your Carpeesh driver safety app details to you the DrivePoints rating recorded for your policy, your most recent driving trips and feedback on your driving.

If Carpeesh holds personal information about you, you may request access to that information by writing to help@carpeesh.com. Carpeesh will respond to any request within a reasonable period.

Correction of personal information that relates to your policy can be updated by the policyholder via carpeesh.com or their Carpeesh driver safety app under Change my policy details. If there is an identified error in the map data for your trips, for example a new speed limit has been applied to a location that our mapping has not updated this, and if this is impacting your DrivePoints, the error can be manually adjusted and trips re-scored.

In order to protect the privacy of drivers, Carpeesh will refuse access where it relates to the driving trips of other drivers, even listed drivers on your policy that are not you. If a claim is under investigation, some data may not be made available whilst investigations are active.

How to make a privacy complaint

If you want to provide feedback, request data access or require more information about how we protect your personal information, please contact the Privacy Officer at help@carpeesh.com

If you're not satisfied with our final decision and it relates to your privacy or how we've handled your personal information, you can contact:

The Office of the Australian Information Commissioner (OAIC).

postal address: GPO Box 5218, Sydney NSW 2001

phone: 1300 363 992

email: enquiries@oaic.gov.au

online: oaic.gov.au

Current at 4 October 2021

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