

Privacy & Communications Policy

Introduction

We are Row.co.uk, a trading name of BIG Warranties Limited, regulated by the Financial Conduct Authority (FRN 798998). Our registered office is Unit 17 Branksome Business Park, Bourne Valley Road, Poole, Dorset, BH12 1DW.

The following are trading names of BIG Warranties Limited:

- Row.co.uk, Registertoday.co.uk, and Go Assist

Service overview:

- BIG Warranties Limited and Row.co.uk provide insurance services.
- Registertoday.co.uk provides a warranty registration service for appliances.

This notice explains how we, and carefully selected partners, collect, use, and safeguard your data. It applies to all customers, policyholders, and visitors to our website.

Protecting your privacy and the security of your personal information is important to us. Please read this notice carefully to understand how we and selected third parties collect, use, and safeguard your personal information.

Who We Work With

We collaborate with trusted partners, including:

- Row.co.uk and Registertoday.co.uk
- Go Assist
- Repairz (Go Assist)
- GAM Administration LLP

These partnerships help us provide repairs, insurance policies, and memberships effectively.

Marketing Communications

We, along with our partners, may use your information to contact you about offers, products, and services that may be relevant to you. Depending on your contact preferences, we may communicate with you by post, telephone, email, or SMS.

We will also send you essential service communications — such as updates about your repair, insurance policy, or membership — as part of the contract we have with you. These communications are necessary to manage your services.

Even after your contract with us ends, you may still receive marketing communications from us or our partners. You can withdraw your consent or object to marketing at any time.

You can opt out of marketing communications or update your contact preferences at any time by:

- Clicking the “unsubscribe” link in our emails.
- Calling us on 0203 411 9409
- Writing to us at: Unit 17 Branksome Business Park, Bourne Valley Road, Poole, Dorset, BH12 1DW.

BIG Warranties collaborates with its partners to offer products tailored to our customers' needs. If you purchase a product connected to one of our partners, they will contact you in line with this policy and your stated preferences.

You may receive communications from:

- BIG Warranties
- Row.co.uk
- Registertoday.co.uk
- Go Assist
- GAM Administration LLP

We are committed to responsible communication. You will not hear from us excessively or inappropriately — only when it is relevant, proportionate, and aligned with your preferences.

Cookies and Tracking Technologies

What Are Cookies? Cookies are small text files that are stored on your device (computer, tablet, or mobile) when you visit a website. They help websites work more efficiently and provide information to the website owners. For more information about cookies, please visit [http:// www.allaboutcookies.org](http://www.allaboutcookies.org).

Our website uses cookies and similar tracking technologies to improve your browsing experience, analyse site traffic, and personalise content and marketing where appropriate. Cookies enable us to improve our service to you, estimate our audience size and usage patterns, store information about your preferences and recognise you when you return to our site.

Types of Cookies We Use

Essential Cookies — These cookies are required for the website to function properly. They support core features such as security, network management, and accessibility. Without them, the website will not work as intended. These cookies cannot be switched off. Non-essential cookies will only be used with your consent.

Non-essential cookies

- **Marketing Cookies** — These may be used to show you relevant advertising based on your browsing behaviour. We only use these where appropriate and with your consent.
- **Analytics Cookies** — These items help the website operator understand how its website performs, how visitors interact with the site, and whether there may be technical issues. For example, we may use Google Analytics or similar tools.
- **Personalisation** — These cookies enable the website to remember choices you make, such as your username, language, or region, to provide you with a more personalised experience.

Managing Cookies: When you first visit our site, you can choose whether to accept or manage non-essential cookies. You can update or withdraw your consent at any time using our cookie management tool or by adjusting your browser settings. Your browser may also allow you to block some or all cookies, including those set by third parties. However, this may affect how parts of our website work. Advertisers or other third parties may also use cookies, which we do not control. Please note that blocking certain types of cookies may impact your experience on our site and limit the services we can provide.

Security

We recognise the need for appropriate protection and management of the personal and financial information you share with us and believe that our systems meet and exceed industry standards. We protect that information using Secure Socket Layer (SSL) encryption technology. We store data in encrypted form on computers and control access via secure web pages. We use firewalls and other security packages to protect ourselves from external attacks. We also test our systems to make sure they meet these expected standards. The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure must be restricted.

Personal Information We Collect and How It Is Used

Collecting Your Information

We collect personal data when you provide it to us, for example, when you:

- Complete online forms
- Contact us by phone, email, or in writing.
- Use our website or services.

You will always know when you are providing personal data to us.

We may also collect certain technical information about your device, such as your IP address, operating system, and browser type, for system administration, security, and to help report aggregate information to our advertisers and selected partners.

Additionally, we may receive personal data about you from trusted third parties, including:

- Search engines (e.g., Google, Bing)
- Marketing agencies and affiliates
- Manufacturers and retailers

What Personal Data We Collect

We collect and process personal information that you provide to us, that we collect from you, or that we receive from third parties. This may include:

- Your name, date of birth, and residential address (including address history)
- Contact details (such as email address and telephone number)
- Information about the products or services you use or purchase.
- Online identifiers, such as your Internet Protocol (IP) address or device ID

In addition, we may collect information about your computer, including your IP address, operating system, and browser type, for system administration and to report information to our advertisers and selected partners.

How We Use Your Information and Who We Share It With

We share your personal information where necessary to provide our services, meet our legal obligations, or improve your experience. This may include sharing with:

- Engineers, suppliers, and contractors involved in fulfilling your repair or service appointments.
- Insurance partners, brokers, and financial institutions involved in providing or managing insurance policies or quotes.
- Consumer review platforms, to collect feedback about our services.
- Debt recovery agencies and fraud prevention bodies

- Professional advisers, auditors, and regulators, including government organisations and law enforcement, if required
- Technology partners who help us deliver or improve our services.
- Advertising platforms (such as Google and Facebook) to deliver targeted advertising, where permitted by law and with appropriate safeguards
- Lead generation providers and marketing agencies assisting with customer acquisition and service development.

Whenever we share your data, we ensure appropriate safeguards are in place, including written agreements requiring third parties to protect your information. We will never sell your personal data.

We may also share your information with trusted partners to help us:

- Improve and develop products and services tailored to our customers' needs
Build and define audiences for advertising with third-party advertisers (e.g., Facebook, Google), based on factors such as online identifiers, age, location, and interests, so that the advertising is relevant to you

All partners acting on our behalf are carefully selected and contractually required to protect your personal information.

As the data controller under the UK General Data Protection Regulation (UK GDPR), we may use your personal data for: Statistical analysis, improving our products and brand, Updating your records, Identifying which of our or others' products may interest you, assessing lending and insurance risks, Detecting, preventing, or tackling fraud, money laundering, or other crime, conducting regulatory checks, keeping you informed about your services and Market research.

We will only disclose your personal information to others for the purposes explained above or where required by law. Where we use agents and subcontractors to provide services on our behalf, they are also required to protect your personal data.

Third-Party Websites - We may receive personal data about you from various third parties as set out below:

- Search Engines, e.g., Google, Bing, Yahoo
- Marketing agencies
- Manufacturers
- Retailers.
- Affiliates

If you would like more information about the third parties who may provide us with your personal data, please contact us using the details provided in the 'Contact Us' section of this policy.

Legal Bases for Processing

The Service

We process your personal data to provide you with our services and products. Without certain personal information, we could not deliver these services or communicate with you effectively.

We process your personal information based on two lawful bases:

- 1) it is necessary for us to fulfil our contractual obligations to you; and
- 2) it is in our legitimate business interests to provide you with insurance-related services and, where appropriate, offer you additional products or services we believe may be of benefit to you.

Whenever we rely on our legitimate interests to process your personal data, we carefully consider and balance those interests against your rights and freedoms to ensure that your privacy is protected.

Fraud

- Before we provide services or goods to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.
- The personal data you have provided, we have collected from you, or we have received from third parties, will be used to prevent fraud and money laundering and to verify your identity.
- Details of the personal information that will be processed, for example: name, address, date of birth, contact details, financial information, device identifiers including IP address and sometimes vehicle details.
- We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate, and prevent crime.
- We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.
- Fraud prevention agencies can hold your data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.
- If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or goods you have requested, or to employ you, or we may stop providing existing services to you.
- A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide services, financing, or employment to you. If you have any questions about this, please contact us on the details provided.
- Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Profiling, Data Analysis and Artificial Intelligence

We may use Artificial Intelligence (AI) and data analysis to help improve our services and provide a better experience for you. AI technologies help us with tasks like customer support, understanding what products or services might interest you, managing claims, improving our processes, personalising content, and helping to detect and prevent fraud.

Sometimes, we use automated systems to help us make decisions, such as assessing or valuing claims. We also use techniques like natural language processing (AI that helps understand speech and text) to analyse information and improve the way we work.

When we use your personal information for this kind of analysis, we may combine it with data from other customers or trusted third parties. Where possible, we use pseudonymisation—this means replacing your personal details (like your name) with a code to help protect your privacy.

We take steps to make sure your data is managed securely and in line with data protection laws. We check that any data we use is fair, accurate, and not biased. We also make sure that any AI systems we use operate responsibly and transparently.

Automated decisions

We may use automated processes when handling your personal data. This means certain decisions may be made automatically, for example, to help detect and prevent fraud or money laundering. This could happen if your activity matches patterns linked to known fraudulent behaviour, appears inconsistent with previous information you have provided, or suggests you may be deliberately concealing your identity.

We use automated systems to help manage and process service requests, such as claims or repair bookings. This may include automated decision-making when assessing your claim. If a claim is declined, you can request that the decision be reviewed by a member of our team.

If you have chosen to receive marketing communications from us, we may use profiling and automated decision-making to help make our marketing more relevant to you. This could include personalising the marketing messages you receive, the offers we send, or the channels we use to contact you.

If an automated decision affects you, you have the right to request a review by a member of our team. We will carefully consider your concerns and reassess the decision, respecting your right to human involvement in any decisions made solely by automated processes.

Data Retention

- If you get a quote, we keep your details for up to 3 years.
- If you purchase a service, we retain your data for 7 years after the agreement ends or registration date to meet legal and regulatory obligations and manage complaints.

However, we may keep your data for longer if required by law or if we have a legitimate business reason to do so. The length of time we keep your information depends on your relationship with us and the reasons we collected it. When your data is no longer needed, we will either delete it or anonymise it for statistical and business purposes.

Your Rights

You have the following rights in relation to the data we hold about you:

- The right to be informed about the processing of your personal data.
- The right to request access to your personal data.
- The right to have your personal data corrected if it is inaccurate or completed if we hold incomplete personal data.
- The right to have your personal data erased.
- The right to restrict the processing of your personal data.
- The right to move, copy or transfer your personal data.
- The right to object to the processing of your personal data
- Rights in relation to automated decision making in addition, we may collect information about your computer including, your IP address, operating system, and browser type - for system administration and to report information to our advertisers and selected partners.

If you wish to exercise any of these rights, please contact us using the details provided in the '**Contact Us**' section of this policy.

- **Subject Access Request (SAR)** - Consumers, customers, employees, and others whose personal data we hold have the right to request access to their personal data. To do so, please submit your request in writing to our Data Protection Officer. We will respond within one month of receiving your request. If your

request is complex, we may extend this period to two months, in which case we will inform you. We aim to comply with all access requests as quickly as possible.

- **Data Accuracy** - We are committed to keeping your personal data accurate and up to date. You have the right to request correction or amendment of any information that is inaccurate or incomplete. If you believe the information, we hold about you is incorrect, please contact us so we can update it.

Contact Us

Our Data Protection Officer is Michael Cant. If you have any questions about this Privacy Policy or how to exercise your rights, please contact our Data Protection Officer:

- Write to: The Data Protection Team, Unit 17 Branksome Business Park, Bourne Valley Road, Poole, Dorset, BH12 1DW.
- Email us: customerservices@row.co.uk

BIG Warranties Limited is registered with the Information Commissioner's Office (ICO) under registration number Z210366X.

Should you feel we have mishandled your personal data, you have the right to complain to the ICO, the UK supervising authority for data protection issues (www.ico.org.uk). We appreciate the chance to address your concerns first, so please contact us initially.

International Data Transfers

Your personal data will not be transferred outside of the European Economic Area (EEA) or the UK unless the recipient applies security and processing standards that meet UK and EU data protection laws. Sometimes we, or third parties acting on our behalf, may need to transfer your personal information outside the UK. Whenever this happens, we take steps to protect your privacy rights and ensure that appropriate safeguards are in place.

Law Relating to this Policy.

This notice is not intended to form a contract or to create any legal obligations not already contained in current legislation. It has been prepared in line with the following legislation:

- UK GDPR (General Data Protection Regulation 2016/679)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)

We may change this notice and policy from time to time by posting the changed version on our website or sending it to clients and other third parties whom we deal with.