



# Gabbro Data Processing Agreement

## 1. What does this agreement cover?

- 1.1. This Data Processing Agreement (hereafter 'DPA') forms part of the Agreement in place between potential and current Customers and Urban Jungle Services LTD (trading as Gabbro) (hereafter 'the Parties') and reflects the Parties' agreement about the processing of personal data.
- 1.2. Urban Jungle Services LTD (trading as Gabbro) (hereafter 'Gabbro', 'we', 'us', 'our') acts as a 'Data Controller' for the Customer (hereafter 'you', 'your'), as Gabbro stores and processes personal data for the Customer as set out in Annex 1.
- 1.3. The Personal data to be processed by Gabbro concerns the categories of data, and the purposes of the processing set out in Annex 1.
- 1.4. "Personal data" means any information relating to an identified or identifiable natural person, see article 4(1) of Regulation (EU) 2016/679 of 27 April 2016 (the General Data Protection Regulation "GDPR").

## 2. About us.

- 2.1. Urban Jungle Services Ltd (trading as Gabbro) is a company registered in England and Wales (Companies House No. 10414152) at 20-22 Wenlock Road, London, N1 7GU.
- 2.2. Urban Jungle Services Ltd (trading as Gabbro) is registered with the Information Commissioner's Office (Registration No. ZA224996) in the United Kingdom and takes all reasonable care to prevent any unauthorised access to your personal data. We adhere to strict security procedures in the storage and disclosure of your information as required by law.

## 3. The Principles of Gabbro Data Processing, and Gabbro Obligations.

- 3.1. All our Customer data will be processed lawfully, fairly and in a transparent manner in relation to individuals.
- 3.2. The data is collected for specified, explicit and legitimate purposes – these are listed in Annex 1 along with our lawful basis for processing this data.
- 3.3. It will not be further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- 3.4. What we collect is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 3.5. We take reasonable steps to make sure the data is accurate and, where necessary, kept up to date.
- 3.6. We keep data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- 3.7. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

- 3.7.1. In doing so, we implement the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- 3.8. We process Customer data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- 3.9. As part of the provision of our services we may need to transfer personal data to another country or to international organisations, these will be listed in Annex 1.
  - 3.9.1. Gabbro must ensure that there is a legal basis for the transfer, e.g. the EU Commission's Standard Contractual Clauses for the transfer of personal data to third countries.
  - 3.9.2. If Gabbro is subject to legislation of another country, Gabbro declares not to be aware of the mentioned legislation preventing Gabbro from fulfilling the DPA, and that Gabbro will notify the Customer in writing without undue delay, if Gabbro becomes aware of that such hindrance is present or will occur.
- 3.10. In order to provide the Services listed in Annex 1, Gabbro may need to share or store personal data with external companies. At the time of the DPA, Gabbro uses the companies set out in Annex 2 to provide the Services listed.
  - 3.10.1. If these external companies will become a data 'controller' (as specified by GDPR) of a Customer's personal data, then a link to their own data processing agreement will be listed in Annex 2.
  - 3.10.2. If Gabbro is using these companies as a 'processor' (as specified by GDPR), then Gabbro has an obligation to ensure that at least the same data protection obligations as set out in the DPA shall be imposed on the 'processor', including an obligation to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of the GDPR.
  - 3.10.3. Gabbro shall remain fully liable to the Customer for the performance of the 'processor' obligations.

## 4. Your rights as a Customer, and how to exercise them.

### 4.1. Your right to be informed.

- 4.1.1. This document covers our processing of your personal data. It covers Gabbro's purposes for processing the personal data, the retention periods for that personal data, and who it will be shared with. This is commonly referred to as 'privacy information'.
- 4.1.2. This DPA is available to you to review before we ask for, or collect any of your personal data.
- 4.1.3. This DPA contains all the relevant information you need to exercise any of your rights.

### 4.2. Your right of access.

- 4.2.1. You have the right to access all the personal data Gabbro may hold about you, including a confirmation of how we processed that data.
- 4.2.2. We will provide this information **free of charge** – unless the request is manifestly unfounded or excessive, particularly if it is repetitive – in which case we will need to charge a fee.
  - 4.2.2.1. In these cases, we will inform you before undertaking any work to fulfil the request.
  - 4.2.2.2. The fee will be entirely based on the administration costs to provide the information (a reasonable hourly rate, for the member of Gabbro staff to compile the information)

- 4.2.3. We will provide this information as quickly as we can, and at least within 1 month of receipt of the request
- 4.2.4. You can exercise this right by submitting your request via email, to the Data Protection Officer contact details listed in this document.

#### 4.3. **Your right to rectification.**

- 4.3.1. You have a right to have inaccurate personal data rectified, or completed if it is incomplete.
- 4.3.2. You can make these changes in one of 3 ways:
  - 4.3.2.1. Using our online 'Manage Account' Services to update your information.
  - 4.3.2.2. By voice, using our customer services helpline – contact details are listed below.
  - 4.3.2.3. By submitting your request via email, to the Data Protection Officer contact details listed below.
- 4.3.3. In all cases, we will respond to the request within one calendar month.
- 4.3.4. We have the right to refuse the request if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.
  - 4.3.4.1. In these cases, we can also request a reasonable fee to deal with the request.
  - 4.3.4.2. The fee will be entirely based on the administration costs to update the information (a reasonable hourly rate, for the member of Gabbro staff to complete the request)

#### 4.4. **Your right to erasure.**

- 4.4.1. Under Article 17 of the GDPR you have the right to have personal data erased. This is also known as the 'right to be forgotten'.
- 4.4.2. You can make this request in one of 2 ways:-
  - 4.4.2.1. By voice, using our customer services helpline – contact details are listed below.
  - 4.4.2.2. By submitting your request via email, to the Data Protection Officer contact details listed below.
- 4.4.3. In all cases, we will respond to the request within one calendar month.
- 4.4.4. We have the right to refuse the request if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.
  - 4.4.4.1. In these cases, we can also request a reasonable fee to deal with the request.
  - 4.4.4.2. The fee will be entirely based on the administration costs to update the information (a reasonable hourly rate, for the member of Gabbro staff to complete the request)
- 4.4.5. The right to erasure is not absolute, and each request will be treated individually, however it applies mainly in the following circumstances:
  - 4.4.5.1. The personal data is no longer necessary for the purpose which we originally processed it.
  - 4.4.5.2. We are relying on consent as the lawful basis for processing the data, and the individual withdraws their consent.
  - 4.4.5.3. We are relying on legitimate interests as the basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing.
  - 4.4.5.4. We must do it to comply with a legal obligation.

#### 4.5. **Your right to restrict processing.**

- 4.5.1. Under Article 18 of the GDPR you have the right to restrict the processing of your personal data in certain circumstances. This means that you can limit the way Gabbro uses your data. This is an alternative to requesting the erasure of your data.
- 4.5.2. You can make this request in one of 2 ways:
  - 4.5.2.1. By voice, using our customer services helpline – contact details are listed below.

- 4.5.2.2. By submitting your request via email, to the Data Protection Officer contact details listed below.
- 4.5.3. In all cases, we will respond to the request within one calendar month.
- 4.5.4. We have the right to refuse the request if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.
  - 4.5.4.1. In these cases, we can also request a reasonable fee to deal with the request.
  - 4.5.4.2. The fee will be entirely based on the administration costs to update the information (a reasonable hourly rate, for the member of Gabbro staff to complete the request)
- 4.5.5. The right to restrict processing is not absolute, and each request will be treated individually, however it applies mainly in the following circumstances:
  - 4.5.5.1. The individual contests the accuracy of their personal data and we are verifying the accuracy of the data.
  - 4.5.5.2. The individual has objected to Gabbro processing their data under Article 21(1) of GDPR, and we are considering whether our legitimate grounds override those of the individual.
- 4.6. **Your right to data portability.**
  - 4.6.1. You have the right to obtain and reuse your personal data for your own purposes across different services.
  - 4.6.2. Gabbro will provide this information in a structured, commonly used and machine readable form (such as a CSV file). Machine readable means that the information is structured so that software can extract specific elements of the data. This enables other organisations to use the data.
  - 4.6.3. You can make this request in one of 2 ways:
    - 4.6.3.1. By voice, using our customer services helpline – contact details are listed below.
    - 4.6.3.2. By submitting your request via email, to the Data Protection Officer contact details listed below.
  - 4.6.4. In all cases, we will respond to the request within one calendar month.
  - 4.6.5. We will provide this information **free of charge**.
- 4.7. **Your right to object.**
  - 4.7.1. You have the right to object to the processing of your personal data, if it falls into the following categories:
    - 4.7.1.1. The lawful basis for processing is based on legitimate interests or the performance of a task in the public interest/exercise of official authority.
      - 4.7.1.1.1. In this case, you must have must have an objection on grounds relating to your particular situation.
    - 4.7.1.2. Direct marketing.
      - 4.7.1.2.1. In this case, we will stop processing personal data for direct marketing purposes as soon as we receive an objection.
    - 4.7.1.3. Processing for purposes of scientific/historical research and statistics.
      - 4.7.1.3.1. In this case, you must have must have an objection on grounds relating to your particular situation.
  - 4.7.2. You can make this request in one of 3 ways:
    - 4.7.2.1. Electronically, on all of our Directing Marketing communications there will be an 'opt-out' link.
    - 4.7.2.2. By voice, using our customer services helpline – contact details are listed below.
    - 4.7.2.3. By submitting your request via email, to the Data Protection Officer contact details listed below.
  - 4.7.3. In all cases, we will respond to the request within one calendar month.

#### 4.8. **Rights related to automated decision making.**

- 4.8.1. Article 22 of the GDPR has additional rules to protect individuals if a company is carrying out solely automated decision-making that has legal or similarly significant effects on them.
- 4.8.2. Gabbro only carry out automated decision making in the following areas:
  - 4.8.2.1. To check that a customer is eligible to purchase an insurance product, based on its terms and conditions.
  - 4.8.2.2. To set a price for an insurance product, using the Customers' personal data to price the risk involved.
  - 4.8.2.3. To try and flag up instances when the Customer would benefit more from a different policy or insurance product.
- 4.8.3. As these decisions are only in relation to us offering for purchase noncompulsory insurance products, we are not carrying out any automated decision making with legal or similarly significant effects.
- 4.8.4. However, if you think that you are being negatively affected by this automated processing – we would still like to understand your situation, and we would welcome your request to have us examine your individual concerns.
- 4.8.5. You can make this request in one of 2 ways:
  - 4.8.5.1. By voice, using our customer services helpline – contact details are listed below.
  - 4.8.5.2. By submitting your request via email, to the Data Protection Officer contact details listed below.
- 4.8.6. In all cases, we will respond to the request within one calendar month.

#### 5. **Amendments.**

- 5.1. The Parties may at any time agree to amend this DPA. Amendments must be in writing.

#### 6. **Our Contact details.**

- 6.1. To make enquiries and/or exercise any of your rights set out in this DPA please contact us using one of the following means:
  - 6.1.1. Use our online customer service chat facility, at <https://getgabbro.com>
  - 6.1.2. Email the Gabbro Data Protection Officer at [dataofficer@getgabbro.com](mailto:dataofficer@getgabbro.com)
  - 6.1.3. Call our customer service helpline on 0800 808 5847 – answerphone messages may be left outside of normal office hours.

## **Annex 1**

### **Scope, Purpose, and Legal Basis of our Data Processing**

#### **Categories of Data we process**

1. Identity Information.
  - 1.1. Name, Date of Birth, Marital Status, Employment Information.
2. Contact Information.
  - 2.1. Email address, Phone Number.
3. Residential Information.
  - 3.1. Address, Ownership status, Home Features and Construction details, additional occupant details.
4. Insurance product information/choices.
  - 4.1. Previous policy history, Claims history, Optional product and service choices.

5. Behavioural Information
  - 5.1. Policy history with us, behaviour when using our services, customer service history.
6. No Unspent Conviction, or No Prosecutions Pending Confirmation
  - 6.1. This is only to check for product eligibility, and we do not ask for, store, or process any details on the criminal offence data.
  - 6.2. We do not keep any register of conviction data.
  - 6.3. As such, we do not require additional legal authority under Article 10 of the GDPR.

## Special Categories of Data we process

1. None

## The ways we process Data, and our Lawful Basis for doing so.

### 1. Transacting and Administering

**Insurance Products** 1.1. We may process your data to:

- 1.1.1. Check your eligibility for our products.
- 1.1.2. Provide you with a quote for our products.
- 1.1.3. If you have purchased a product, to provide the corresponding services to you.
- 1.2. Our lawful basis for this processing is that this processing is necessary to provide you with a quote for services before entering a contract, and to fulfil our contractual obligations when a contract is entered into.
- 1.3. The retention period for this data and its processing is indefinite, as you may continue to be or return to us as a customer at any point in the future.

### 2. Statistical Processing

2.1. We may process your data to:

- 2.1.1. Build, update, and refine statistical and mathematical models related to the pricing and administration of insurance products and the detection of fraud.
- 2.2. Our lawful basis for this processing is that we will have already collected and processed the data in relation to Purpose 1 (above). Article 5 of the GDPR states that, “further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes”
- 2.3. The retention period for this data and its processing is indefinite, as we continually pursue further scientific research on statistical models for insurance.

### 3. Marketing our products

3.1. We may process your data to:

- 3.1.1. Determine suitability, and potential interest in our products
- 3.1.2. Communicate with you about those products through direct marketing, and other advertising channels.
- 3.2. Our lawful basis for this processing is that you will have given us consent to process your personal information in this way.
  - 3.2.1. We ask people to positively opt in to marketing processing and communications.
  - 3.2.2. This is unbundled from using our services in any other way.
  - 3.2.3. They can opt out of this processing at any time and will have the option to do so electronically on all marketing communications.
- 3.3. We will continue to process the data for this purpose until the customer decides to withdraw their consent.

## Locations where we Store and Process Data

1. UK
2. Ireland

## Annex 2

### External Parties or Services we use in relation to Data Processing

Company	Service Provided	'Controller' or 'Processor'	Link to their DPA
Amazon (AWS)	Server and database hosting platform.	'Processor'	<a href="https://aws.amazon.com/compliance/eudata-protection/">https://aws.amazon.com/compliance/eudata-protection/</a>
HB Underwriting	Underwriting Partner	'Controller'	<a href="https://www.hbunderwriting.co.uk/privacy-policy/">https://www.hbunderwriting.co.uk/privacy-policy/</a>
U K Insurance Limited trading as NIG	Underwriting Partner	'Controller'	<a href="https://nig.com/privacy/">https://nig.com/privacy/</a>
Paymentsshield	Back end administrators for 1 of our insurance products.	'Controller'	<a href="http://www.paymentsshield.co.uk/fairprocessing-notice">http://www.paymentsshield.co.uk/fairprocessing-notice</a>
Coplus	Back end administrators for 1 of our insurance products.	'Controller'	<a href="https://www.coplus.co.uk/privacy-policy/">https://www.coplus.co.uk/privacy-policy/</a>
Miramar Underwriting Limited	Underwriting Partner	'Controller'	Please contact Miramar here for a copy:- <a href="mailto:property@miramaruw.co.uk">property@miramaruw.co.uk</a>
Great Lakes Insurance SE	Underwriting Partner	'Controller'	<a href="https://www.munichre.com/content/dam/munichre/global/content-pieces/documents/Great-Lakes-Insurance-SE-Information-Notice.pdf/_jcr_content/renditions/original/Great-Lakes-Insurance-SE-InformationNotice.pdf">https://www.munichre.com/content/dam/munichre/global/content-pieces/documents/Great-Lakes-Insurance-SE-Information-Notice.pdf/_jcr_content/renditions/original/Great-Lakes-Insurance-SE-InformationNotice.pdf</a>
ERGO Versicherung	Underwriting Partner	'Controller'	<a href="http://www.ergoinsurance.co.uk/ergo/legalnotice">http://www.ergoinsurance.co.uk/ergo/legalnotice</a>

AG, UK Branch			
Davies Managed Systems Limited	Claims Administrators	'Controller'	<a href="https://davies-group.com/privacy-policy/">https://davies-group.com/privacy-policy/</a>
Stripe	Payment Processing Provider	'Processor'	<a href="https://stripe.com/gb/privacy">https://stripe.com/gb/privacy</a>
GoCardless	Payment Processing Provider	'Processor'	<a href="https://gocardless.com/eneu/legal/privacy/">https://gocardless.com/eneu/legal/privacy/</a>
Google	Web analytics service.	'Processor'	<a href="https://privacy.google.com/businesses/compliance">https://privacy.google.com/businesses/compliance</a>
Facebook	Web analytics service.	'Processor'	<a href="https://en-gb.facebook.com/business/gdpr">https://en-gb.facebook.com/business/gdpr</a>
Microsoft	Web analytics service.	'Processor'	<a href="https://www.microsoft.com/enus/TrustCenter/Privacy/gdpr/default.aspx">https://www.microsoft.com/enus/TrustCenter/Privacy/gdpr/default.aspx</a>
Hotjar	Web analytics service.	'Processor'	<a href="https://www.hotjar.com/legal/policies/privacy">https://www.hotjar.com/legal/policies/privacy</a>
Zendesk	Customer Service platform.	'Processor'	<a href="https://www.zendesk.co.uk/company/customers-partners/eu-data-protection">https://www.zendesk.co.uk/company/customers-partners/eu-data-protection</a>
MailChimp	Email sending platform.	'Processor'	<a href="https://mailchimp.com/legal/privacy/">https://mailchimp.com/legal/privacy/</a>
Auth0	User account services.	'Processor'	<a href="https://auth0.com/privacy">https://auth0.com/privacy</a>
PaperPlanes	Marketing distribution provider	'Processor'	<a href="http://flypaperplanes.co.uk/privacy/">http://flypaperplanes.co.uk/privacy/</a>
TV Squared Ltd	Web analytics service.	'Processor'	<a href="https://tvsquared.com/privacy-policy/">https://tvsquared.com/privacy-policy/</a>
Sky UK limited	Web analytics service.	'Processor'	<a href="https://www.sky.com/help/articles/skyprivacy-and-cookies-notice">https://www.sky.com/help/articles/skyprivacy-and-cookies-notice</a>