

# Privacy Policy

We're committed to respecting and protecting your personal data.

This Privacy Policy describes how Pluto Services Ltd (we/us/our/Pluto) take care of your data when you use our websites (<https://pluto.travel> or <https://buy.pluto.travel>) or our services on Facebook Messenger (<https://m.me/travelpluto>) or purchase travel insurance from us. If you ever have any questions about your data or what we do with it, please email us at [hello@pluto.travel](mailto:hello@pluto.travel).

By purchasing insurance from us, using our website or our Facebook Messenger chatbot, you accept and agree to what we do with your data as described in this Privacy Policy.

We note that our website may contain links to other third-party websites. If you follow these, please note that they have their own privacy policies and that we can't accept any responsibility for what they do with your data.

We are registered with the Information Commissioner's Office (ICO). Our certificate can be found [here](#).

## Data we may collect about you

- **Personal data that you provide**, such as when you visit our websites or interact with the support team including your name, age, email address and anything you say to Pluto within Facebook Messenger including your conversation history with us and details we require to provide you with a policy.
- **Insurance policy details**, when you buy a policy from us we will keep a record the fact that we sold it to you, some of this is used to detect fraud
- **Website and chatbot usage**, such as details of visits to our websites and information collected through cookies and other tracking technologies including your domain name, browser version, operating systems, traffic data, location data, weblogs and other communication data and the stuff that you access.
- **Claims information**, when submitting a claim, detailed data about your trip and the conditions of your claim, this may include medical data, such as an injury or illness.

We do not take or store any of your financial information such as credit card details. These are securely handled directly and independently by our payment providers who only provide a payment confirmation to us.

Sometimes you will agree to another company not mentioned above to provide us data about you, this may be through one of our partners, for example, you may share your name, date of birth or holiday details, this will always be to receive a quote and use our service.

## What we do with your data

When we ask you to provide certain data, rest assured it will only be used in accordance with this policy. We're required by law to let you know what legal grounds we have to justify each use of your personal data and so these are also described below.

The types of things we use your data for are:

- **To provide our services effectively:** like selling you insurance, helping us manage your account or improving our services. Our legal ground for doing this is 'legitimate interests' as it enables us to perform our obligations and provide our services to you. Where we process your medical data to administer your policy our legal ground for doing this is your consent which we will ask for at the time we collect it.
- **To carry out necessary compliance and fraud checks:** Our legal grounds for doing this is our legitimate interests (to make sure you're not a Bond villain and that you fall within our acceptable risk profile and to assist with the prevention of fraud).
- **To inform you of changes to our services:** Our legal basis for this is our legitimate interests to conduct our business.
- **To reorganise or make changes to our business:** If we are subject to negotiations for the sale of our business or a part of it, we are sold to a third party or undergo a reorganisation we may need to transfer some or all of your personal information to the relevant third party or its advisors as part of the due diligence process. Our legal ground for doing this is our legitimate interest to make changes to our business.
- **In connection with our legal or regulatory obligations:** we may disclose your personal data to third parties, the court services and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by parties anywhere in the world. Where permitted we will notify you before responding to requests. Our legal grounds for doing this is fulfilling our legal obligations, dealing with legal claims and our legitimate interests to cooperate with law enforcement and regulatory authorities.

## How we secure your data

We use bank-grade encryption to protect your data where we store it (at-rest) and ensure it's encrypted while sending across the internet (in-transit).

## How long we keep your data

We keep certain data on record for 7 years, to meet the FCA's requirements. We only keep other data as long as we reasonably need it for the purposes for which we received it and any linked purpose.

If you ask us to delete the data that we hold about you, we'll always aim to do so within 48 hours, except that we're not allowed to delete data which is required for fraud detection and legal reasons.

You'll have to delete Facebook data directly with them e.g. deleting the conversation thread.

## Sharing your data with others

We do not share your data with third parties other than as described in this policy. The third parties that we may pass your personal data to fall into the following categories:

- Data controllers** (who process your personal data independently and under their own policies):
- Facebook: Any data you share on Facebook Messenger will be accessible by Facebook as described in their Terms of service.
  - Insurance and claims handling: We may provide companies in the Zurich Insurance Group with your personal data for the purposes of underwriting the insurance provided

and to support the handling of claims. More information about their handling of your personal data can be found [here](#).

- Compliance: We may also pass your data to companies that perform fraud and crime checks. We are required by law to do this.
- Partners: We may share your data with anyone who you give us explicit permission to share with. You'll always agree to this before we share anything.

**Data processors** (who process your personal data on our behalf and under our instruction and subject to our privacy safeguards):

- Technology providers: We use various cloud and technology providers to offer our service (for example, hosting providers), they will only have access to your data with our consent. Usually, they only have access to anonymised or aggregated data.

## International data sharing

We store all your data within the European Economic Area ("EEA"), but it may be processed or viewed by staff or companies outside the EEA who work for us or one of our partners. Regardless of location, we'll always impose on our employees or contractors the same data protection safeguards that we use inside the EEA. Where we are transferring your data to countries which are outside the EEA and that have not been approved by the European Commission as providing essentially equivalent protections to within the EEA, we will transfer it subject to European Commission approved contractual terms.

## Your rights and contacting us

If you're situated within the EU you may have the rights set out below. These rights can be made use of via email at [hello@pluto.travel](mailto:hello@pluto.travel).

1. Request access to your personal data
2. Request an update to your personal data
3. Request your account to be closed and personal data to be deleted, though for legal reasons we might not always be able to do it
4. Object or request restriction to processing your data e.g. opt out of certain marketing
5. Request the transfer of your data to you. We will provide this in a common format
6. Withdraw consent at any time where we are relying on consent to process your data
7. You have the right to lodge a complaint with us and if you're not satisfied with the [Information Commissioner's Office](#)

## Cookies

Like most websites and apps, we use cookies (small crumbs of data that sit in your browser).

By using the Pluto website or our services you agree to our use of cookies.

Cookies never hold any personal data and are used to: track and analyse behaviour or remember preferences you've set. They can also be used to show you specific adverts when you're on other websites.

Mainly, we place cookies in your browser, but so do some of our third parties e.g. Google, Facebook or our payment providers, this helps to track you across different websites.

You can turn off cookies your browser or phone settings. Try searching in your 'Help' section, or have a look at <http://www.aboutcookies.org/>.

## Data Controllers

We are registered with the Information Commissioner's Office under number ZA217721 and the Data Controller is Pluto Limited. Our address is Pluto Services Limited, 6 - 31 Three Colt St, London, E14 8HH, United Kingdom.

Details of other partners who also provide parts of our service are set out below. We don't have control over how they use your data, but we wouldn't be working with them if we didn't trust them.

1. Facebook Incorporated Ireland Ltd ('Facebook') at 4 Grand Canal Square, Grand Canal Harbour, Dublin, Ireland. More information here: <https://www.facebook.com/policy.php>.
2. Zurich Insurance Group Ltd ('Zurich'), The Zurich Centre 3000 Parkway, Fareham, Whiteley, PO15 7JZ. More information here: <https://www.zurich.co.uk/en/services/privacy>
3. Claims Settlement Agencies Ltd ('CSA'), 12 Helmet Row, London, EC1V 3QJ. More information here: <https://csal.co.uk/privacy-policy/>
4. World Travel Protection Canada Inc ('WTP'), Private Bag 913, North Sydney, NSW 2059, Australia. More information [here](#).

## Updating this policy

We may update this policy at any time by updating this page. The updated policy will be effective from the date it's posted.

We will always aim to notify you of important changes to this policy and we encourage you to review the policy from time to time when you visit the website. If you don't agree with these changes, you can let us know and we'll close your account.

If you're not satisfied with our use of your personal data you can also contact the Information Commissioner's Office.

## Congrats!

Congratulations on reading this all! Sorry if this was boring, it helps Pluto to protect your data!

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