

# Drover Privacy Policy

## Introduction

Drover Limited (Drover, we us and our) is a private limited company, registered in England & Wales under company no 09829742 at 8 Orsman Road, London, N1 5QJ.

This policy explains how Drover collect, process and disclose your information.

If you have any queries about how we use your information, want to access the personal data we hold on you (subject access request) or request the erasure of your data (right to be forgotten) please contact us at [service@joindrover.com](mailto:service@joindrover.com).

We hope you will be happy with the way we handle your information, but if not, you have the right to complain to the Information Commissioner if there is a problem. For more information visit [www.ico.org.uk](http://www.ico.org.uk).

## How Drover collect your personal data

We only request the personal data that we need to fulfil our contract with you, collecting the majority of it during the sign-up and booking journey.

Depending on whether you are using Drover as a private-hire subscriber, personal subscriber or fleet partner we will ask for different personal data from you. E.g. if you are a private-hire subscriber we will ask for your private-hire license number.

Below is the complete list of personal data we collect, depending on what you're using Drover for we will ask for a subset of:

- Full name and personal details including contact information (e.g. home address, time UK resident, email address, telephone number)
- Date of birth and National Insurance number (e.g. to make sure that your eligible to have a Drover Subscription)
- Driving License, PCO License, DVLA penalty points, insurance claim history, motoring offences history, criminal convictions history (e.g. to make sure that your eligible to have a Drover Subscription)
- Financial information, bank account details, payment card details (e.g. to pay you for any monies owed, to take payment for your subscription)
- Car registration, vehicle details (e.g. if you put your vehicle on Drover we will perform online checks to confirm vehicle eligibility)
- Information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources (e.g. to make sure that your eligible for the Drover service)

- Rating information from other Drover users (e.g. Drivers can rate the owner of the vehicle they subscribe to)
- Information you post on Drover's social networking features or pages (e.g. the Drover Facebook and Twitter page)
- Vehicle location during your subscription (e.g. vehicle location from the vehicle on-board diagnostics and GPS system)
- Penalty Charge Notice (PCN) information (e.g. if the driver is caught speeding Drover will know the information on the PCN so they can manage it)
- Details of the device you use to access and/or use any Drover services, which may include your IP address or other unique device identifiers

## How Drover process your personal data

Drover are joint data controllers with Great Lakes Insurance SE (Great Lakes). Great Lakes is the insurer of your policy. Drover are authorised to sell the insurance policy on behalf of Great Lakes.

If you have a specific question on Data Protection regarding Great Lakes, the Drover team will be happy to put you in touch with them. Contact us on [service@joindrover.com](mailto:service@joindrover.com).

Drover will use your data to:

What we do	What data we use	Process we run	Lawful basis for processing
Assess your suitability to have a subscription with Drover	<ul style="list-style-type: none"> <li>● Address</li> <li>● Date of birth</li> <li>● Driving License</li> <li>● PCO License</li> <li>● DVLA penalty points</li> <li>● Insurance claim history</li> <li>● Motoring offences history</li> <li>● Criminal convictions history</li> </ul>	<ul style="list-style-type: none"> <li>● Check against insurance requirements</li> <li>● Run affordability check</li> <li>● Run license information through DVLA database</li> <li>● Sanctions check</li> </ul>	Performance of our contract with you
Process your booking (taking and refunding payments)	<ul style="list-style-type: none"> <li>● Payment card details</li> <li>● Bank account details</li> </ul>	<ul style="list-style-type: none"> <li>● Charge your account as per subscription terms</li> </ul>	Performance of our contract with you
Fraud and money laundering detection and prevention, debt tracing, debt recovery,	<ul style="list-style-type: none"> <li>● Name</li> <li>● Payment card details</li> <li>● Bank account details</li> <li>● Email address</li> <li>● Telephone number</li> </ul>	<ul style="list-style-type: none"> <li>● Charge your account as per Drover terms</li> </ul>	Performance of our contract with you

credit management and crime			
Notify you about changes to any Drover services or respond to any communication or request from you	<ul style="list-style-type: none"> <li>• Email address</li> <li>• Telephone number</li> </ul>	<ul style="list-style-type: none"> <li>• Contacting you via telephone or email</li> </ul>	Performance of our contract with you
Send you transactional emails about your booking/account	<ul style="list-style-type: none"> <li>• Email address</li> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Contacting you via email</li> </ul>	Legitimate Interests
Send you marketing communication about Drover (if you have opted in to marketing emails)	<ul style="list-style-type: none"> <li>• Email address</li> <li>• Address</li> </ul>	<ul style="list-style-type: none"> <li>• Contacting you via email</li> <li>• Contacting you via post</li> </ul>	Consent
Monitor the use of Drover services	<ul style="list-style-type: none"> <li>• Email address</li> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Look at your account history</li> </ul>	Performance of our contract with you
To investigate any complaints or potential breaches of the service	<ul style="list-style-type: none"> <li>• Email address</li> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Look at your account and communication history</li> </ul>	Performance of our contract with you
Advertise your (the owners) vehicle on the Drover platform	<ul style="list-style-type: none"> <li>• Vehicle registration place</li> <li>• Email address</li> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Run vehicle history check</li> </ul>	Performance of our contract with you
Send confirmation of your insurance policy to the motor insurance database (MID) which is a legal requirement	<ul style="list-style-type: none"> <li>• Vehicle registration</li> <li>• Name</li> </ul>	<ul style="list-style-type: none"> <li>• Send insurance policy information to MID</li> </ul>	Performance of our contract with you

## How Drover disclose your personal data

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access or loss of your information.

Subject to applicable data protection law we may share your personal data with:

- Companies that provide a service for Drover (e.g. payment providers)
- Fraud detection and prevention agencies
- Affordability check agencies when you first subscribe and then again during your subscription
- Other organisations who use shared databases for affordability checks and to manage/collect arrears
- Vehicle information agencies, to gather information on your vehicle so we can correctly market it on the Drover platform
- To any relevant public authority, government body or law enforcement agency
- Courts, to comply with legal requirements, and for the administration of justice

- Specialised debt recovery agencies, if there are outstanding charges at the end of the driver's subscription
- Our legal and other professional advisors, including our auditors
- In an emergency, or to otherwise protect your vital interests
- A third party who acquires the Drover business, your information may be one of the transferred assets
- If you have opted into marketing; to third parties engaged by us to provide you with marketing communications about our products and services. This may also include social media platforms (including Facebook) where we provide limited information about our users (e.g. their email address) to the social media platform so they can provide to us an anonymous demographic profile of our users with profiles on that platform to inform our targeted marketing activities on that platform
- Third parties from whom you have chosen to receive marketing information.

Your Information may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers.

We will ensure any data export is undertaken in accordance with relevant data protection laws and take all steps reasonably necessary to ensure that your Information is treated securely and in accordance with this privacy policy.

### **Monitoring of communications**

We may keep a record of communication (e.g. online chat, email, telephone calls). We do this for regulatory compliance, self-regulatory practices, crime prevention and staff training.

### **How Drover protects your information**

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Drover services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Information, we cannot guarantee the security of data transmitted to the Service; any transmission is at your own risk. Once we have received your Information, we will use strict procedures and security features to try to prevent unauthorised access.

The time period for which we keep your Information varies according to what the information is used for. Unless there is a specific legal requirement for us to keep information for a specific period of time, we will keep your Information for as long as is reasonably required, relevant and useful for the purpose for which it was provided to us including for collecting any monies you owe.

We will also continue to hold your Information, if you do not register with us, if your registration or payment using Drover is declined, or even after you have closed your account or your arrangements with us have been terminated by you or us or payment

details have been deleted. We will only hold this information for such period of time as is reasonably necessary for the purpose of dealing with enquiries, offering any Drover services you may be interested in, complying with any legal obligation, for crime and fraud prevention and detection and for recovering any monies you owe.