Drover Privacy Policy

Your Privacy and Security

1. Introduction

This Privacy Statement will help you understand how we collect, use and protect your personal information when you interact with us. Please take a few moments to read the sections below and learn how we may use personal information. You should also show this notice to anyone else who may be accessing your information. In order to comply with regulations we retain the data in relation to your policy for seven years after conclusion of the contract you hold with us. Any data which has Employers Liability will be kept for 60 years.

The data controller is Drover Limited, registered in England and Wales, company number 09829742. Address: 8 Orsman Road, London, N1 5QJ, United Kingdom.

For more Information see

https://www.joindrover.com/

Our Partner Munich Re Digital Partners, We Work,1 Fore Street, London. EC2Y 9DT is also a data controller. For more information see https://www.munichre.com/en/service/privacy-statement/index.html

The insurer Great Lakes Insurance SE is also a data controller, Plantation Place, 30 Fenchurch Street, London EC3M 3AJ, United Kingdom. For more information see

 $\underline{\text{https://www.munichre.com/en/reinsurance/contact/worldwide/europe/united-kingdom/great-lakes-uk/aboutus/index.html}$

If you have any questions about this privacy notice or about your Data Subject Access Rights including:

- Data Portability: The transfer of your personal data to another Data Controller.
- Erasure: To have your personal data removed or deleted.
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate or the processing is unlawful.
- · Subject Access Request: To access your personal data and information around its processing.
- · Objecting to direct marketing.

Please contact Data Protection Officer at: 8 Orsman Road, London, N1 5QJ, United Kingdom

Or

service@joindrover.com

2. What information do we collect about you

We will collect your personal information when:

You contact us to ask a question,

you obtain a quotation from us,

you use our website,

we process any new policy documentation, renewal documentation or mid-term adjustments process claims and when we provide you with information about our services.

Personal Data

Categories of data	Type of information processed	Where the data comes from	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Individual Information	Name, address, marital status, date and place of birth, nationality.	Insurance intermediaries or other insurance market participants. You and your family. Credit reference agencies (if credit is applied for).	The insurer Group companies providing administration. Reinsurers. Credit reference agencies (if credit is applied for) Anti-fraud databases.	Setting you up as a client including possible fraud, sanctions, credit and anti- money laundering checks. Evaluating and pricing the risks to be insured and validating any appropriate premium.	Performance of our contract with you.

Categories of data	Type of information processed	Where the data comes from	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Financial Information	Premiums and claims paid on your policies. Bank account or payment card details. Income and other financial information.	Insurance intermediaries or other insurance market participants. You and your family. Credit reference agencies (if credit is applied for).	The insurer Group companies providing administration. Credit reference agencies (if credit is applied for) Anti-fraud databases.	Collecting any appropriate premium.	Performance of our contract with you.

Categories of data	Type of information processed	Where the data comes from	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Statutory and anti- fraud information	Credit history, credit score, sanctions and information from anti-fraud databases concerning you.	Insurance intermediaries or other insurance market participants. You and your family. Credit reference agencies (if credit is applied for) Anti-fraud databases, sanctions lists, court judgements and other government agencies.	The insurer Group companies providing administration. Credit reference agencies (if credit is applied for) Anti-fraud databases.	Setting you up as a client including possible fraud, sanctions, credit and anti- money laundering checks.	Performance of our contract with you. Compliance with a legal obligation.

Categories of data	Type of information processed	Where the data comes from	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Claim Information	Information about previous and current claims.	Insurance intermediaries or other insurance market participants. You and your family. Credit reference agencies (if credit is applied for) Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjustors, solicitors and claims handlers.	The insurer Group companies providing administration. Reinsurers. Credit reference agencies (if credit is applied for). Anti-fraud databases.	Managing insurance and reinsurance claims. Defending or prosecuting legal claims. Investigating or prosecuting fraud.	Performance of our contract with you. Compliance with a legal obligation.

Categories of data Emails, SMS	Type of information processed Name.	Where the data comes from	Who we disclose the data to	Purpose of processing Setting you up as a client	Lawful basis of processing Performance
and telephone recordings	address, marital status, date and place of birth, nationality, employer, job title, employment history, family details and their relationship to you.	intermediaries or other insurance market participants You and your family. Credit reference agencies (if credit is applied for).	Group companies providing administration. Reinsurers. Credit reference agencies (if credit is applied for) Anti-fraud databases.	including possible fraud, sanctions, credit and antimoney laundering checks. Evaluating and pricing the risks to be insured and validating any appropriate premium. Prevention of unauthorised use of our telecommunications systems and websites Quality control and training	of our contract with you. Compliance with a legal obligation.

Special Categories of Data

Categories of data	Type of information processed	Source of the data	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Individual Information	Gender, health information and medical reports.	Insurance intermediaries or other insurance market participants. You and your family. Credit reference agencies (if credit is applied for).	The insurer Group companies providing administration. Reinsurers. Other intermediaries or market participants. Credit reference agencies (if credit is applied for). Anti-fraud databases.	Evaluating and pricing the risks to be insured and validating any appropriate premium.	Consent.

Categories of data	Type of information processed	Where the data comes from	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Statutory and anti- fraud information	Criminal records and convictions. Surveillance reports.	Insurance intermediaries or other insurance market participants. You and your family. Credit reference agencies (if credit is applied for) Anti-fraud databases, sanctions lists, court judgements and other government agencies.	The insurer Group companies providing administration. Reinsurers. Other intermediaries or market participants. Credit reference agencies (if credit is applied for) Anti-fraud databases.	Setting you up as a client including possible fraud, sanctions, credit and anti- money laundering checks. Evaluating and pricing the risks to be insured and validating any appropriate premium	Processing carried out under the control of official authority.

3. Non-personal information collected online

Cookies

While you are on-line, your computer saves so-called cookies. These are small files that control how our website is displayed and operates. Cookies do not damage your computer and do not contain viruses. Cookies serve to make our internet presence more user-friendly, effective and secure.

Most of the cookies we use are "session cookies" which are automatically deleted as soon as you leave the site. Other cookies remain on your computer until you delete them. Such cookies allow us to recognise your browser the next time you visit and the browser settings let previously viewed pages load faster, for example. We use cookies to offer you the best possible experience on our website.

We therefore save them and analyse their data – although they do not identify you personally. This improves the usefulness of our website. We perform anonymous statistical analyses of our internet presence, and do not identify you personally.

You can change your browser settings so that you are notified when cookies are being used, and you can allow them only once, or refuse them in certain cases or completely. You may also activate the automatic deletion of cookies when you close your browser. Deactivating cookies may restrict website functionality.

4. Dealing with other people

Policy administration

We will deal with anyone named on the policy. It is not our policy to deal with your spouse, partner or parent without your written consent. If you would like someone else to deal with your policy on your behalf on a regular basis please let us know.

If you give us information about another person, in doing so you confirm that they have given you permission to provide it to us to be able to process their personal data (including any special personal data) and also that you have told them who we are and what we will use their data for, as set out in this privacy statement.

5. Marketing

If you have opted in to receive marketing material Drover Limited or group companies (which includes any company of whom the ultimate parent company is Drover Limited) will contact you from time to time by telephone, post, e-mail or SMS to keep you informed with news, products or services, including but not limited to boat insurance together with carefully selected offers or promotions which we feel may be of interest to you. Other carefully selected companies may also contact you by post.

If you want to receive the marketing material referred to above please contact us using either the email address service@joindrover.com, tel: 020 3848 4000 or write to The Data Protection Officer at the above address.

6. Confidentiality

We treat your personal information as private and confidential.

The disclosures we make have been detailed in Section 2 above.

We would like to bring to your attention our obligations to disclose information in the following four exceptional cases permitted by law, and the other situations as set out below. These are:

- Where we are legally compelled to do so;
- Where there is a duty to the public to disclose;
- Where disclosure is required to protect our interest;
- Where disclosure is made at your request or with your consent.

Also, from time to time we will employ agents and sub contractors to process your personal information on our behalf. The same duty of confidentiality and security will apply to them and all processing will be carried out under our instruction.

If you make a complaint about the service we have provided, we may be obliged to forward details about your complaint, including your personal information to the relevant Ombudsman, the insurer and to Lloyds. In the unfortunate event that you have to make a claim then we will need to disclose information with any other party involved in that claim. This may include:

Third parties involved with the claim, their insurer, solicitor or representative;

Medical teams, the police or other investigators and Courts.

7. Credit reference

When you apply to us to open an account we make a number of checks to assess your application for credit and verifying identities to prevent and detect crime and money laundering. To obtain this information, we will check the following records about you and anyone else who may also be insured and whose personal details have been provided as part of the insurance application.

Our own records:

Credit Reference Agency (CRA) records. When we search these CRAs this will place a search footprint on your credit file that may be seen by other lenders. They supply us with both public (including the electoral register), and shared credit and fraud prevention information;

Fraud Prevention Agency (FPA) Records.

We make searches about you at credit reference agencies who will supply us with information, including the Electoral Register and credit information. The agencies will record details of the search whether or not your application proceeds. The searches will not be seen or used by lenders to assess your ability to obtain credit. We may use scoring methods to assess this application and to verify your identity. Credit searches and other information which is provided to us and/or the credit reference agencies, about you and those with whom you are linked financially, may be used by other companies if you, or other members of your household, apply for other facilities including insurance applications and claims. This information may also be used for debt tracing and the prevention of money laundering as well as the management of your account. Alternatively, we may ask you to provide physical forms of identification.

We may also make periodic searches at CRAs and FPAs to manage your account with us.

Information on applications will be sent to and recorded by CRAs. When you borrow from us, we will give details of your account(s) and how you manage it/them to CRAs. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs and FPAs to perform similar checks, and to trace your whereabouts and recover debts that you owe. Records remain on file for six years after they are closed, whether settled by you or defaulted.

If you give us false or inaccurate information and we suspect or identify fraud, we will record it and may also pass this information to FPAs and other organisations involved in the prevention of crime and fraud.

If you borrow from us and do not make payments that you owe us, we will trace your whereabouts and recover debts.

Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law.

How to find out more

This is a condensed guide to the use of your personal information. If you would like to read the full details of how your data may be used please contact the Data Protection Officer at the address above.

You can contact the CRAs currently operating in the UK; the information they hold may not be the same so it is worth contacting them all. They will charge you a small statutory fee.

- Call Credit. Consumer Services Team, One Park Lane, Leeds, LS3 1EP or call 0845 366 0071 or log on to www.callcredit.co.uk
- Equifax. Credit File Advice Centre, PO Box 1140, Bradford, BD1 5US or call 0844 335 0550 or log on to www.equifax.co.uk
- Experian. Credit Expert, PO Box 7710, Nottingham, NG80 7WE or call 0344 481 0800 or log on to www.experian.co.uk

If necessary we may also have to investigate your claims and conviction history in the course of administering any claim. You can be assured that we will keep such investigations strictly confidential.

Insurers pass information to the Claims Underwriting and Exchange Register, run by Insurance Database Services (IDS). This helps insurers check information and prevent fraudulent claims. When we deal with your request for insurance we may search these registers. Under the conditions of your policy you must tell us about any incident (such as an accident or theft) which may give rise to a claim. When you tell us about an incident we will pass information to the registers.

8. Fraud prevention and detection notice

In order to prevent and detect fraud insurers may, at any time:

- Share information about you with us and other group companies:
- Pass details to Insurance Hunter, a central insurance application and claims checking system, whereby it may be checked against information held by Insurance Hunter and shared with other insurers.
- If false or inaccurate information is provided and fraud is identified details will be passed to fraud prevention agencies.
- o Law enforcement agencies may access and use this information.
- We and other organisations may also access and use this information to prevent fraud and money laundering, for example when:
- Checking details on applications for credit and credit related or other facilities;
- Managing credit and credit related accounts or facilities;
- Recovering debt;
- Checking details on proposals and claims for all types of insurance;

We and other organisations may access and use, from other countries, the information recorded by fraud prevention agencies.

We may also disclose information about you and your policy:

- the insurer and other group companies In the event that we undergo re-organisation or are sold to a third party, in which case you agree that any personal information we hold about you may be transferred to that re-organised entity or third party.
- O Where it is necessary to deliver the products and services bought by you, for example, we may disclose your personal information to a credit card company to validate your credit card details and obtain payment. It may also be necessary for us to pass your personal information to the organisation from whom you have ordered any products or services other than your insurance product, such as legal expense provider, etc. At all times we will remain the data controller unless we inform you otherwise.

9. Information security

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

10. Transfer of data

We will not transfer your personal data to countries that do not provide an adequate level of data protection. Your personal data may be disclosed to companies within the Group outside the EEA and to Service Providers outside the EEA.

11. Privacy support

We reserve the right to amend or modify this Privacy Statement at any time and in response to changes in applicable law.

If you are unhappy with any response or have a complaint. You can raise this with:

The Information Commissioner Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF www.ico.org.uk