

Coverys UK: Privacy Notice

Coverys UK is committed to protecting your privacy, providing clear information about how your personal data is processed and complying with data protection law.

This Privacy Notice, together with our website terms and conditions any other documents referred to in it and the London Market Core Uses Information Notice which can be found **here:** <https://www.londonmarketgroup.co.uk/gdpr> sets out how insurance market participants, i.e. Coverys UK, collects and uses your personal data. Please read this Privacy Notice carefully.

1. About us

In this Privacy Notice references to "we" or "us" or "Coverys UK" refer to the following Coverys UK group companies:

- Coverys Managing Agency Limited, registered in England and Wales under company number 04690709 with its registered office at 71 Fenchurch Street, London EC3M 4BS (**CMAL**), authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. CMAL is the principal of the following two companies;]
- DTW 1991 Underwriting Limited, registered in England and Wales under company number 08330551 with its registered office at 71 Fenchurch Street, London EC3M 4BS (**DTW1991 UL**), an appointed representative of CMAL, registered in England and Wales under company number 04690709 with its registered office at 71 Fenchurch Street, London EC3M 4BS, authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority; and
- Coverys 1975 Underwriting Limited, registered in England and Wales under company number 11057396 with its registered office at 71 Fenchurch Street, London EC3M 4BS (**Coverys 1975 UL**) an appointed representative of CMAL, registered in England and Wales under company number 04690709 with its registered office at 71 Fenchurch Street, London EC3M 4BS, authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Each company acts as the data controller in respect of the personal data that we process.

2. What is 'personal data'?

Your 'personal data' means information about you, and any information from which you can be identified - either by reference to an identifier (for example your name, location data or online identifier (IP address)) or from factors specific to your physical, cultural or social identity.

3. About this Privacy Notice

This Privacy Notice sets out the general privacy terms that apply to Coverys UK's dealings with individuals including policyholders, brokers, coverholders, suppliers, advisers, service providers, enquirers, beneficiaries and claimants and their agents and relatives, as well as visitors to the following websites ("you"):

- www.dtw1991.com;

- www.coverys.com

It tells you what personal data we collect, why we need it, how we use it and what protections are in place to keep your personal data secure.

Privacy Notices specific to each Coverys UK entity, providing further details about how we collect and use your personal data, may be found on the websites listed above (together, the **Websites**).

4. Layered approach

Under data protection law, we are required to provide you with a lot of information about how we collect and use your personal data. It is easy for all this information to become confusing rather than helpful.

We therefore use a layered approach to providing you with the information required by law. This means that we may provide the information required in a number of different formats and documents. In particular, it means that, in our initial contact with you, we may provide you only with the most important information about how we will use your personal data; but we will always provide you with easy access to all the further information you need about our privacy practices.

5. What personal data do we collect and process?

Information provided to us by you

Personal data may be provided to us by you may include, as applicable:

- information that you give us by entering information into our Websites, e.g. your name and contact details given when providing feedback;
- information that you provide by filling in forms or upload to us, which may include sensitive information on your physical or mental health or information relating to your financial history, including County Court Judgments and bankruptcy proceedings, and criminal convictions and offences; and
- other information that you give us when corresponding with us by email, by telephone, or by post.

Information provided to us by third parties

Depending on your relationship with us, your personal data may be provided to us in relation to a proposal or claim by third parties such as brokers, your employer, a claimant, claims investigators, experts and witnesses, insurers and/or law enforcement authorities. This data may include:

- information including your name, address and contact details;
- information relating to your financial history, including County Court Judgments and bankruptcy proceedings;
- sensitive information on your physical or mental health, in particular in relation to accident and travel products; and
- information relating to any criminal convictions and offences.

Information collected automatically by us

Personal data collected by us automatically, when you visit our Websites, may include:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions and operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), what you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

6. How we use your personal data

We will only use your personal data when the law allows us to do so. In general, we will use your data:

- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- where we need to comply with a legal or regulatory obligation.

In some circumstances, applicable data protection laws may require us to obtain your consent to the processing of your personal data. Where this is the case, we will ask you for your consent in accordance with those laws. You may withdraw your consent to such processing at any time. This will not affect the lawfulness of any processing that took place before your consent was withdrawn.

Please note that if you withdraw your consent in relation to an insurance policy that we are administering or a claim that we are handling, then this is likely to impact our ability to administer that insurance policy and handle claims.

7. What do we use your personal data for?

We use your personal data for the purposes listed below. Where we need to collect personal data from you for any of these purposes and you do not provide the information requested, this may, as applicable, affect our ability to deal with any complaint that you have raised, or to deal with your claim. We will notify you if this is the case at the time that the information is requested.

Management of our relationship with you

Depending on our relationship with you, we may process your personal data to:

administer your insurance policy, including by carrying out underwriting and claims handling activities (for more information about what these activities may include, please see the London Market Core Uses Information Notice below:

<https://www.londonmarketgroup.co.uk/gdpr> ;

- communicate with you and with third parties as part of our business;

- respond to and handle your complaints; and
- notify you about changes to our products, services and the applicable terms and conditions.

In these circumstances, the legal basis for processing your data will be our legitimate interests in managing our relationship with you, and administering insurance policies.

Operation of our business

In order to operate our business, we may use your personal data to:

- carry out functions relating to the administration of insurance policies, such as arranging emergency assistance abroad;
- handle third party claims, including by corresponding with beneficiaries, claimants, experts and witnesses; and
- manage our business operations and comply with internal policies and procedures.

We may also analyse personal data such as records of your complaints to assess the level of service that we provide and for staff training purposes.

In respect of the above purposes, the legal basis for processing will be our legitimate interests in operating our business.

Compliance with a legal obligation

We may process your data because we are required to do so by applicable law. This includes where we process the data to:

- carry out certain identity checks;
- identify and prevent fraud; and
- maintain certain accounts and records.

In these circumstances, the legal basis for processing your personal data will be to comply with a legal obligation.

Information collected automatically through the Websites

We use the information collected automatically through the Websites to:

- administer and run the Websites, and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our Website to ensure that content is presented in the most effective manner for you and for your computer; and
- help keep our Websites secure.

In respect of these purposes, the legal basis for processing the data is our legitimate interest in administering and improving our Websites and its features, and keeping our Websites secure.

8. Marketing

We may also use your contact information to provide you with information about our products and services which we think may be of interest to you. We may contact you about these by email if you have previously consented to this or the information relates to products or services previously purchased by you.

Where this is the case, our legal basis for processing is our legitimate interests in carrying out marketing activities.

We will get your express opt-in consent before we share your personal data with any company outside Coverys UK for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

9. Who do we share your personal data with?

We may share your personal data with the following third parties, where relevant:

- our staff, agents and contractors;
- other Coverys group companies;
- our professional advisers;
- third party contractors that provide services to us, such as medical screening companies, surveyors, loss adjustors, solicitors, emergency assistance providers and auditors;
- third parties such as governmental bodies and regulatory authorities (for example where we are required to share information in accordance with applicable legislation);
- other insurance market participants for example agents, brokers, third party administrators, other insurers and reinsurers; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Websites.

10. How do we keep your personal data safe?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. The terms of our contracts with third party contractors include obligations on them in relation to what personal data they can process and what they can do with that information.

11. How long do we keep your personal data for?

We keep your personal data only for as long as is reasonably necessary for the purposes for which we process your personal data, as listed above in this Privacy Notice.

The relevant retention periods are set out in our Retention Policy, which takes into account factors including:

- any applicable legal obligation to hold records for a specified minimum period;
- the amount, nature, and sensitivity of the personal data;
- the potential risk of harm from unauthorised use or disclosure of your personal data; and
- the purposes for which we process your personal data, and whether we can achieve those purposes through other means.

When your personal data is no longer required, we ensure that it is securely deleted.

12. International data transfers

The Coverys group operates in several jurisdictions worldwide, including the USA. For the purposes set out above, we may transfer your personal data to our group companies, service providers, business partners and governmental or public authorities located in other countries. For example, we may share your details with a third party assistance provider in order to provide emergency medical assistance services when you are abroad.

Where your data is transferred to a destination outside the European Economic Area (**EEA**), local laws may provide for a lower standard of protection for personal data than is applicable within the EEA. We therefore require our group companies and third parties to have appropriate safeguards in place so that your personal data is protected.

13. Your rights

You have certain rights under data protection legislation in relation to the personal data that we hold about you. This may include the right to require us to:

- provide you with further details on the use we make of your personal data;
- provide you with a copy of the personal data we hold about you;
- update any inaccuracies in the personal data we hold about you;
- delete any of your personal data that we no longer have a lawful ground to use;
- where processing is based on your consent, stop that particular processing when your consent is withdrawn;
- object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
- restrict how we use your personal data whilst a complaint is being investigated;

- object to the processing of your personal data for the purposes of direct marketing; or
- transfer your personal data to a third party in a standardised machine-readable format.

Please note that these rights may be restricted in particular circumstances, for example in order to safeguard the public interest (such as for the prevention or detection of crime), or in other situations such as where legal privilege applies.

If you would like to contact us about your rights, please see the contact details below.

14. Changes to this Privacy Notice

We may change the content of this Privacy Notice from time to time without further notice. Any changes will be highlighted to you in an updated Privacy Notice.

This Privacy Notice was last updated on 22 May 2018.

15. Cookies policy

Our Websites use cookies. If you would like to find out more about how we use cookies then please go to our Cookies Policy pages on the Websites.

16. Contacting us

If you have any questions about how we collect, store or use your information, or you would like to update the information we hold about you, please contact our Data Protection Officer at data.protection@coverys.co.uk or at:

The Data Protection Officer
Coverys Managing Agency Limited
71 Fenchurch Street
London
EC3M 4BS

Where applicable, you may also wish to contact the agent or broker that issued your contract of insurance or Lloyd's at enquiries@lloyds.com or at Lloyd's, One Lime Street, London, EC3M 7HA.

17. Your right to complain

If you are not satisfied with our use of your personal data or our response to any request by you to exercise your data protection rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal data. In the UK, this is the ICO, details of which can be found <https://ico.org.uk/>.

If you are unsure of the authority that supervises our processing of your personal data then please contact us for further guidance.