

Coverys London Privacy Notice

We are committed to protecting your personal information. This privacy notice explains why your personal data is collected, how it is processed and why we use it.

1. About us

In this Privacy Notice references to "we" or "us" or "Coverys London" refer to the following Coverys UK group companies (each with its registered office at 25 Fenchurch Avenue, 1st Floor, London, EC3M 5AD):

- Coverys UK Holding Co. Limited, registered in England and Wales under company number 10810836;
- Coverys Limited, registered in England and Wales under company number 14939984, authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority;
- Coverys Services Limited, registered in England and Wales under company number 10792038; and
- Coverys MGA (UK) Limited, registered in England and Wales under company number 12282267, authorised and regulated by the Financial Conduct Authority
- Coverys Managing Agency Limited, registered in England and Wales under company number 04690709; and
- Coverys European Holdings Limited, registered in England and Wales under company number 11875294.

Each of the above companies acts as data controller in respect of the personal data that it processes.

2. What is personal data

Personal data is information that relates to an identified or identifiable individuals e.g. a name, identification number, location data or an online identifier such as an IP address or cookie.

3. Where we get personal information from

- Information provided to us by you;
- Information provided to us by third parties e.g. brokers, employers, claimants, claims investigators, experts and witnesses, insurers, law enforcement authorities; and/or
- Information collected automatically by us via our website

4. What information do we collect & use

We collect or use the following information:

- Names and contact details
- Addresses
- Date of birth
- Health information (including physical and mental health conditions)
- Identification documents

- Account information e.g. insurance policy, claims
- Financial transaction information e.g. court judgements, bankruptcy proceedings
- Legal enforcement information
- Marketing preferences
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints
- Records of meetings and decisions

5. Why do we need this information

We need this information to:

A. Provide and manage insurance policies

The information will be used in relation to:

- activities relating to the administration of insurance policies including underwriting and claims handling activities;
- handling third party claims, including correspondence with beneficiaries, claimants, experts and witnesses;
- responding to and handling complaints;
- communicating with policyholders and third parties;
- notifying changes to our products, services and the applicable terms and conditions; and
- managing our business operations and compliance with internal policies and procedures. We may also analyse personal data i.e. complaints records to assess the level of service that we provide and for staff training purposes

Our lawful bases for collecting or using personal information is our legitimate interest in providing insurance services, managing relationships and operating our business.

B. Comply with legal and regulatory requirements

Information will be used where it is needed to satisfy legal or regulatory obligations, including:

- identity checks;
- identification and prevention of fraud;
- prevention of crime or to defend against legal action; and
- maintaining certain accounts and records

Our lawful bases for collecting or using personal information is our legal obligation to operate our business in accordance with applicable legislation and regulation and to prevent crime.

C. Improve website performance and for marketing purposes

Information from our website and marketing consent will be used to:

- administer and run our website, 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 way;
- help keep our website secure; and
- provide you with information about our products and services which, based on your relationship with us, we believe may be of interest to you. Information will not be shared with third parties without your express consent and you may opt out of receiving marketing messages at any time

Our lawful bases for collecting or using personal information is our legitimate interest in operating our business, administering and improving our website and its features and for carrying out marketing activities.

Information will be used in accordance with the UK GDPR and your consent will be obtained where required. You may withdraw your consent to such processing at any time. This will not affect the lawfulness of any processing that took place before consent was withdrawn. Please note that if you withdraw your consent in relation to an insurance policy that we are administering, an insurance claim that we are handling or a complaint that you have raised, then this may impact our ability to administer that insurance policy, manage claims effectively or resolve complaints.

6. Who do we share information with

We may share personal information with the following third parties, on a need to know basis or to enable them to process data on our behalf or where we are obliged to do so under applicable laws or regulations:

- our staff, agents and contractors;
- other Coverys group companies;
- professional or legal advisers;
- third parties who provide services to us, such as medical screening companies, third party administrators, surveyors, loss adjusters and auditors;
- organisations we're legally obliged to share personal information with such as governmental bodies and regulatory authorities (for example in the prevention of financial crime);
- other insurance market participants for example agents, brokers, other insurers and reinsurers; and
- analytics and search engine providers who assist us in the improvement and optimisation of our websites.

7. How long do we keep your information

Personal data is only retained for as long as it is relevant for the purpose in which it was collected. The relevant retention periods are set out in our Data Retention and Disposal Policy. It is important to note that:

- information must be retained for the relevant limitation period where it is required for legal proceedings or litigation; and
- information must be retained for a defined period in accordance with actions or investigations instigated by regulators

Personal data is securely deleted or disposed of when it is no longer required

8. Sharing information outside the UK

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.

Where your data is transferred to a destination outside the UK, we comply with the UK GDPR and ensure appropriate safeguards are in place to protect your personal data.

9. Your data protection rights

You have rights under the UK GDPR in relation to your personal data. These include:

- A right to be informed – you have the right to be informed about the collection and use of your personal data;
- Your right of access – you have the right to ask for copies of your personal data;
- Your right to rectification - you have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- Your right to erasure – you have the right to ask us to erase your personal data in certain circumstances;
- Your right to withdraw consent - when we use consent as our lawful basis you have the right to withdraw our consent;
- Your right to object to processing – you have the right to object to the processing of your personal data in certain circumstances Your right to restriction of processing – you have the right to ask us to restrict the processing of your personal data in certain circumstances; or
- Your right to data portability – you have the right to ask that we transfer the personal data you gave to us to another organization, or to you, in certain circumstances.

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 or make a request, please see the contact details below. We have one calendar month to respond to you.

10. Changes to this Privacy Notice

This Privacy Notice may be amended from time to time and this version is dated July 2024. If you would like a copy of previous versions these can be requested from our Data Protection Officer, whose contact details are below.

11. Cookies Policy

Our website uses cookies. If you would like to find out more about how we use cookies, please go to our Cookies Policy page on the website.

12. How to contact us

If you have any questions about how we collect, store or use your information, or would like to change 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 Limited
25 Fenchurch Avenue
1st Floor
London, EC3M 5AD

Where applicable, you may also wish to contact the agent or broker who issued your contract of insurance.

13. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details listed above.

If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the ICO, the independent supervisory authority for data protection in the UK.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://ico.org.uk/make-a-complaint>