

GrovesJohnWestrup Private Clients - Privacy Notice

This privacy notice is designed to help you, as a customer of GrovesJohnWestrup Private Clients, to understand how we process your personal data.

You are a customer of GrovesJohnWestrup Private Clients and we are acting as a Managing General Agent (MGA), providing insurance solutions to a panel of insurance brokers.

Insurance is provided by different insurers who are all part of the Munich Re Group.

The insurance lifecycle may involve the sharing of your personal data with other insurance market participants, some of which, you may not have direct contact with. You can find out more information about these processors by contacting the intermediary that you purchased your policy from.

The Data Controller is GrovesJohnWestrup Private Clients which is a trading name of Munich Re Specialty Insurance (UK) Ltd:

Munich Re Specialty Insurance (UK) Ltd
Union, 2-10 Albert Square
Manchester
M2 6LW
Tel: 0161 236 3380

The Data Protection Officer for Munich Re Specialty Insurance (UK) Ltd is:

The Data Protection Officer
Munich Re Specialty Insurance (UK) Ltd
1 Fen Court
London
EC3M 5BN
Tel: +44 (0) 20 3003 7000
Email: p0060010241@munichre.com

Please contact the Data Protection Officer if you have questions concerning this Privacy Notice or your Data Subject Rights. These include:

- Subject Access Request: To request access to your personal data and information around its processing.
- 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.
- To object to processing based on legitimate interest.
- To object to direct marketing (we do not do direct marketing).

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

Tel: +44 (0) 303 123 1113

Who your data is shared with

The following are data controllers that we share your personal data with:

- Insurers - including Munich Re Syndicate Limited, DAS Legal Expense Insurance Company Limited, HSB Engineering Insurance Limited and Great Lakes Insurance SE.
- Reinsurers - including Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München.
- Agents – that sell insurance products on our behalf.
- Brokers – that have advised our insurance products to you.
- Government Agencies.
- Legal advisers.

The following are data processors that we disclose your personal data to:

- Third Parties providing services for Legal, Banking, Claims Handling, Credit Checking, Insurance Administration and IT Services.

Please contact the Data Protection Officer (p0060010241@munichre.com) if you require further information on who your data is shared with.

What information do we collect about you

Personal Data

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Individual Information	Name, address, marital status, gender, date and place of birth, nationality, employer, job title, employment history, family details and their relationship to you.	Insurance intermediaries or other insurance market participants. You and your family.	Group companies. Reinsurers. Other intermediaries or market participants. Anti-fraud databases.	Setting you up as a client including arranging insurance cover (issuing quotations, renewals, policy administration, claims administration). In connection with a proposed or actual sale, merger, acquisition, reorganisation, business transfer, financial arrangement, asset disposal, or other corporate or financial transaction relating to our business, employees and/or assets held by our business.	Performance of our contract with you.
Policy Information	Information about the quotes and insurance policies you have applied for or taken out.	Insurance intermediaries or other insurance market participants. You and your family.	Group companies. Reinsurers. Other intermediaries or market participants. Anti-fraud databases.	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium.	Performance of our contract with you.
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.	Group companies. Reinsurers. Other intermediaries or market participants.	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating, validating and collecting any appropriate premium. In connection with a proposed or actual sale, merger, acquisition, reorganisation, business transfer, financial arrangement, asset disposal, or other corporate or financial transaction relating to our business, employees and/or assets held by our business.	Performance of our contract with you.

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential 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, anti-fraud databases, sanctions lists, court judgements and other government agencies.	Group companies. Reinsurers. Other intermediaries or market participants. Anti-fraud databases. Credit reference agencies.	Setting you up as a client including checks for possible fraud, sanctions, credit and anti-money laundering checks.	Performance of our contract with you.
					Compliance with a legal obligation.
Claim Information	Information about previous and current claims.	Insurance intermediaries or other insurance market participants. You and your family. Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjusters, solicitors and claims handlers.	Group companies. Reinsurers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists. Loss adjusters and solicitors.	Managing insurance and reinsurance claims.	Performance of our contract with you.
				Investigating or prosecuting fraud.	Compliance with a legal obligation.
				Defending or prosecuting legal claims.	Processing is necessary for the defence of legal claims.

Special Categories of Personal 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	Health information, medical reports. Criminal records and convictions.	Insurance intermediaries or other insurance market participants. You and your family. Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjustors and solicitors.	Group companies. Reinsurers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists. Loss adjustors and solicitors.	Setting you up as a client and managing your policy. Managing insurance and reinsurance claims. Defending or prosecuting legal claims. In connection with a proposed or actual sale, merger, acquisition, reorganisation, business transfer, financial arrangement, asset disposal, or other corporate or financial transaction relating to our business, employees and/or assets held by our business.	Processing is necessary for an insurance purpose
					Processing is necessary for the defence of legal claims.
Statutory and anti-fraud information	Information about previous and current claims. Criminal records, convictions and court judgements. Surveillance reports.	Insurance intermediaries or other insurance market participants. You and your family. Anti-fraud databases, sanctions lists, court judgements and other government agencies.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases. Loss adjustors and solicitors.	Setting you up as a client and managing your policy. Managing insurance and reinsurance claims. Defending or prosecuting legal claims.	Compliance with a legal obligation
					Processing is necessary for the defence of legal claims.

We may also disclose information about you and your policy to:

- The insurer and other group companies;
- Other insurance companies and third parties in connection with a proposed or actual sale, merger, acquisition, reorganisation, business transfer, financial arrangement, asset disposal, or other corporate or financial transaction relating to our business and/or assets held by our business;
- Where it is necessary to deliver the products and services bought by you, for example, we may disclose your personal data 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 data 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.

Protection of your information

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.

Call Monitoring and Recording

For quality control purposes and to audit the evaluation process for the underwriting and pricing of the risks to be insured, we may review copies of telephone, SMS and email recordings made with the intermediary that you purchased your policy from.

Data Retention

Your personal data will only be kept for as long as it is necessary for the purpose it was collected for.

Category of data	How long we retain your data
Insurance policies, proposal forms, renewal notices, certificates, etc.	In accordance with accounting and tax requirements or, if later, until claims under policy are barred and all outstanding claims are settled
Each new risk that is underwritten	6 years or 40 years for Employers Liability
Any material aggregation of exposure to risk from a single source or of the same kind or to the same potential catastrophe or event	6 years
Each notified claim including the amounts notified and paid, precautionary notices and any re-opened claims	6 years from date of closure of claim. Unless specific jurisdictional requirements dictate a longer period.
Claims correspondence	At least 3 years after claims settlement
Policy and contractual documents and any relevant representations made to policyholders	6 years or 40 years for Employers Liability
Other events or circumstances relevant to determining the risks and commitments that arise out of contracts of insurance or contracts for insurance	6 years or 40 years for Employers Liability

Where the retention period is set by reference to the tail of the business, the period commences when there is a reasonable expectation that no further claims would be notified under the relevant policy.

Transfer of Data

We will not transfer your personal data outside the UK or EEA where there is not an adequate level of data protection.

Your personal data may be disclosed to companies within our Group or to Service Providers outside the UK or EEA. However, we ensure that there is an adequate level of data protection in place and adhered to by these parties.

You can find out the details about any other party we have shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this privacy notice.

Changes to this GrovesJohnWestrup Private Clients - Privacy Notice

If we make changes to this privacy notice that affects how we process your information, we will revise the notice and publish it on our website.