

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 7886 3900
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. Your family. Your employer. Credit reference agencies.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists	Setting you up as a client including checks for potential fraud, sanctions, credit and anti-money laundering. Underwriting, evaluating and pricing of the risks to be insured and calculating and validating the appropriate premium for your policy.	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
Policy Information	Information about the quotes and insurance policies you have applied for or taken out.	Insurance intermediaries or other insurance market participants. Your family. Your employer.	Group companies. Reinsurers. Our agents and brokers. 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. Your family. Your employer. Credit reference agencies.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Credit reference agencies. 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.
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. Member of your family. Your employer. 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.	Setting you up as a client including checks for possible fraud, sanctions, credit and anti-money laundering. 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. Compliance with a legal obligation. Processing is necessary for the defence of legal claims.

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
Claim Information	Information about previous and current claims.	Insurance intermediaries or other insurance market participants. Member of your family. Your employer. Anti-fraud databases, claimants, defendants, witnesses, experts inc. medical experts, loss adjustors, solicitors and claims handlers.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists.	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. 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	Gender and health information. Medical reports. Criminal records and convictions.	Insurance intermediaries or other insurance market participants. Member of your family. Your employer.	Group companies. Reinsurers. Our agents and brokers. Other intermediaries or market participants. Anti-fraud databases. Medical doctors and specialists.	Setting you up or managing you as a client. Evaluating and pricing the risks to be insured and calculating and validating any appropriate premium where there is health or life insurance.	Performance of the insurance contract with you or consent. Processing is necessary for the defence of legal claims.

Categories of data	Type of information processed	Source of the data	Who we disclose the data to	Purpose of processing	Lawful basis of processing
Statutory and anti-fraud information	Criminal records, convictions and court judgements. Surveillance reports.	Insurance intermediaries or other insurance market participants. Member of your family. Your employer. 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. Medical doctors and specialists.	Setting you up or managing you as a client. Evaluating and pricing the risks to be insured and validating any appropriate premium where there is health or life insurance, including checks for potential fraud, sanctions, anti-money laundering and other statutory checks.	Processing carried out under the control of official authority. Processing is necessary for the defence of legal claims.

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.

Use of your Consent to process Special Categories of Personal Data

In order to provide insurance, in certain circumstances we may need to process special categories of personal data, such as medical records or criminal convictions.

We follow the lawful basis that your insurer has used in processing and disclosing your special categories of personal data to us. This may be for the performance of the insurance contract or consent. If consent is used, you will not have given your consent directly to us but to the insurer that you purchased your policy from. You may withdraw your consent for us to process your special categories of personal data at any time by contacting the Data Protection Officer (details as above). However, if you withdraw your consent this will impact on our ability to provide or continue to provide insurance for your insurance policy or pay claims.

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 60 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 60 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 60 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 information 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.