

PRIVACY POLICY

Provego Limited is committed to protecting your personal information.

This Privacy Policy relates to our use of any personal information we collect from you.

Personal Information

We collect and use personal information about you so that we can provide you with a policy that suits your insurance needs. This policy explains how we use your data and you can request a copy in writing to us at Compliance Department, Provego Limited, Brookfield Court, Selby Road, Leeds, LS25 1NB.

The Data Controller responsible for this personal information is Provego Ltd. Additional controllers include Royal and Sun Alliance plc, China Re Syndicate 2088 at Lloyd's and AXA XL as insurers of the products. Provego Ltd trading as Provego Underwriting are responsible for the sale and distribution of the product.

Personal Information we collect and how we use it

We will use your personal information:

- To provide you with insurance: we need this to decide if we can offer insurance to you and if so on what terms and to administer your policies, handle any claims and manage any renewal,
- To support legitimate interests, we have as a business: we need this to manage arrangements we have with reinsurers, for the detection and prevention of fraud and to help us better understand our customers and improve our customer engagement (this includes, marketing, customer analytics and profiling),
- To meet any applicable legal or regulatory obligations: we need this to meet compliance requirements with our regulator (The Financial Conduct Authority), to comply with law enforcement and to manage legal claims, and
- To carry out other activities that are in the public interest: for example, we may need to use personal information to carry out anti money-laundering checks.

As well as collecting personal information about you, we may also use personal information about other people whom you may wish to insure on your policy. If you are providing information about another person, we expect you to ensure that they know you are doing so and are content with their information being provided to us. You may find it helpful to show them this privacy notice and if they have concerns please contact us on the information provided below.

For Commercial Products, the personal information we collect and use, will include name, address, date of birth, financial information, business and property details. For Commercial Motor Products we will also capture vehicle detail. If a claim is made, we will also collect personal information about the claim from you and any relevant third parties. We may also need to ask for details relating to the health or any unspent offences or criminal convictions of you or somebody else covered under your policy. We

recognise that information about health, offences or criminal convictions is particularly sensitive information. Where appropriate we will ask for consent to collect and use this information.

If we need your consent to use personal information, we will make this clear to you when you complete an application or submit a claim. If you give us consent to using personal information, you are free to withdraw this at any time by contacting us – please refer to the “Contact Us” information on our website. Please note that if consent to use information is withdrawn, we may not be able to continue to provide the policy or process claims and we may need to cancel the policy.

You do not have to provide us with any personal information, but if you do not provide the information, we may not be able to proceed with your application or any claim you make.

Some of the information we collect as part of this application may be provided to us by a third party. This may include information already held about your business, property and vehicles, from previous quotes and claims, information we obtain from publicly available records, our trusted third parties and from industry databases, including fraud prevention agencies and databases.

Databases we use for Underwriting and Fraud Prevention and Detection purposes

We may use your information to allow us to detect and prevent fraudulent applications and claims. For details relating to information held about you on the Claims Underwriting and Exchange Register and Motor Insurance Anti-Fraud and Theft Register, please visit www.insurancedatabases.co.uk.

For details relating to information held about you by the Driver and Vehicle Licensing Agency (DVLA) please visit www.dvla.gov.uk.

How your data is used and shared by Insurers in Databases in relation to motor insurance

The data you provide will be used by us and shared with other insurers as well as certain statutory and other authorised bodies for:

- Insurance underwriting purposes i.e. to examine the potential risk in relation to your (and/or a third party's) prospective policy so that we can:
 - Consider whether to accept the relevant risk,
 - Make decisions about the provision and administration of insurance and related services for you (and members of your business household),
 - Validate your (or any person or property likely to be involved in the policy or claim) claims history (at any time including upon application for insurance, in the event of an accident or a claim, or at time of renewal).
- Management Information purposes. To analyse insurance and other markets from the purposes of
 - Portfolio assessment,
 - Risk Assessment,
 - Performance reporting,
 - Management reporting.
- Anti-Fraud purposes.

To detect and prevent fraudulent claims and/or activities by:

- Sharing information about you with other organisations and public bodies including the police,

- Tracing debtors or beneficiaries, recovering debt, managing your accounts and/or insurance policies,
- Undertaking fraud searches. Insurers pass information to fraud prevention agencies and databases including the Claims Underwriting and Exchange Register and where appropriate the Motor Insurance Anti-Fraud and Theft Register by the Insurance Database Services Limited (IDSL). This helps insurers check information and prevent fraudulent claims. When we deal with your request or insurance, we may search these registers.

Compliance with legal obligations and responsibilities.

- Claims Management – in the event of a claim we may need to disclose information with any other party involved in that claim such as third parties involved in the incident, their insurer, solicitor or representative and medical teams, the police or other investigators. We also may have to investigate your claims and conviction history.
- Complaints Management – if you make a complaint about the service we have provided, we may be obliged to forward details about your complaints, including your personal information to the relevant ombudsman.
- Information about your insurance policy will be added to the Motor Insurance Database (MID) managed by the Motor Insurers' Bureau (MIB). MID and the data stored on it may be used by certain statutory and/or authorised bodies including the polices, the DVLA, the DVLANI, the Insurance Fraud Bureau and other bodies permitted by law. This information may be used for purposes permitted by law, which include by are not limited to:
 - Electronic Licensing
 - Continuous insurance enforcement
 - Law enforcement (prevention, detection, apprehension and or prosecution of offenders)
 - The provision of Government services and/or other services aimed at reducing the level and incidence of uninsured driving.

How your data will be processed

- Information which is supplied to fraud prevention agencies and databases such a IDSL and MID can include details such as your name, address and date of birth together with details of any injury arising from a claim.
- Your data may be supplied to databases to facilitate automatic no claim discount validation checks.
- Your data may be transferred to any country, including countries outside of the European Economic Area, for any of the purposes mentioned above.
- Under your policy you must tell us about any incident (such as an accident or theft) which may or may not give rise to a claim. When you tell us about an incident, we will pass information relating to it to the fraud prevention agencies and databases such as IDSL.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. In the event we sell any business, personal data held by us about our customers will be one of the transferred assets.

You can ask for more information about this. If you require such information, please contact Provego Limited.

How we use your data - Driving Licence Number

Insurance underwriting purposes i.e. to examine the potential risk in relation to your (and/or a third party's) prospective policy so that we can:

- Provide your (or any person included on the proposal) Driving Licence Number (DLN) to the DVLA to confirm your (or the relevant person included on the proposal) Licence status, entitlement and relevant restriction information and endorsement/conviction data. Searches may be carried out prior to the date of the insurance policy and at any point throughout the duration of your insurance policy including at the mid-term adjustment and renewal stage. A search of the DLN with the DVLA should not show a footprint against your (or another relevant person included on the proposal) driving licence.
- Searches may be carried out at point of quote and, if an insurance policy is accepted, at renewal stage

Please note that if you give us false or inaccurate information it may invalidate your insurance policy/prospective insurance policy, or it could affect the amount we pay to settle any claims you make under the policy.

Credit Searches

To ensure Provego and our insurers have the necessary facts to assess your insurance risk, verify your identity, help prevent fraud and provide you with our best premium and payment options, we may need to obtain information relating to you at quotation, renewal and in certain circumstances where policy amendments are requested. We or our agents may:

- undertake checks against publicly available information (such as electoral roll, county court judgments, bankruptcy orders or repossession(s)). Similar checks may be made when assessing claims,
- carry out a quotation search from a credit reference agency (CRA) which will appear on your credit report and be visible to other credit providers. It will be clear that this is a quotation search rather than a credit application.

Where you agree to pay your premium monthly under a credit agreement, the status of your quotation search from our credit reference agency (CRA) will be updated to reflect your credit application and this will be visible to other credit providers. CRA's may keep a record of this search.

In order to assess your application, we will supply your personal information to our CRA and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRA's on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRA's will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

Automated decision making

We carry out automated decision making to decide whether we can provide insurance to you and on what terms, deal with claims or carry out fraud checks. In particular, we use an automated underwriting engine to provide on-line quotes, using the information we have collected.

On-line Information

Our full Privacy and Cookies Policy can be found at <http://www.provego.co.uk/privacy-policy>.

Marketing

We may use personal information we hold about you to help us identify and tailor products and services that may be of interest to you. We will do this in accordance with any marketing preferences you have provided to us. We may continue to do this after your policy has ended.

If you wish to unsubscribe or amend your marketing preferences, please contact us:

By Email: info@provego.co.uk.

By Post: Provego Ltd, Compliance Department, Brookfield Court, Selby Road, Leeds, LS25 1NB.

How long we keep your personal information for

We maintain a retention policy to ensure that we only keep personal information for as long as we reasonably need it for the purposes explained in this policy. We need to keep information for the period necessary to administer your insurance and deal with claims and queries on your policy. We may also need to keep information after our relationship with you has ended, for example to ensure we have an accurate record in the event of any complaints or challenges, carry out relevant fraud checks, or where we are required to do so for legal, regulatory or tax purposes.

Your Rights

You have various rights in relation to your personal information, including the right to request access to your personal information, correct any mistakes on our records, erase or restrict records where they are no longer required, object to use of personal information based on legitimate business interests, ask not to be subject to automated decision making if the decision produces legal or other significant effects on you, and data portability. For more details in relation to your rights, including how to exercise them, please see our full privacy policy or contact us – refer to the “Contacting us” details below.

Contacting us

If you have any questions about how we use personal information, or if you want to exercise your rights stated above, please contact our Compliance Team by either emailing them info@provego.co.uk or writing to them at Provego Limited, Compliance Department, Brookfield Court, Selby Road, Leeds, LS25 1NB.

If you have a complaint or concern about how we use your personal information, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have the right to lodge a complaint with the Information Commissioners Office at any time. We are registered under the ICO at ZA092877.