



## 1 Introduction

DTW1991 is committed to protecting your privacy. This Privacy Notice explains how we handle the personal information that we collect about you. We take security issues seriously and have implemented appropriate steps to help maintain the security of our information systems and processes to prevent the accidental destruction, loss or unauthorised disclosure of the information we collect.

It explains what personal information we collect, how we use your personal data, who the data is shared with, how we keep it safe and for how long we retain your personal information. In addition we set out your rights in respect of your data. Please take time to read this Notice and our website terms and conditions.

In this Privacy Notice references to “You” or “Your” means:

- policyholders and covered parties,
- brokers, intermediaries and agents,
- coverholders,
- service providers and advisers,
- claimants and their agents and relatives,
- enquirers and visitors to our websites.

## 2 About us

In this Privacy Notice references to DTW1991, “we”, “our” or “us” means:

i. Syndicate DTW1991 at Lloyd’s, a syndicate at Lloyd’s, managed by Coverys Managing Agency Limited, registered in England and Wales under company number 04690709 with its registered office at 71 Fenchurch Street, London, EC3M 4BS (“Coverys”), authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

ii. DTW1991 Underwriting Limited. registered in England and Wales under company number 08330551 with its registered office at 71 Fenchurch Street, London, EC3M 4BS, an appointed representative of Coverys, 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 entity acts as the data controller in respect of the personal data we process.

Our websites are:

- [www.dtw1991.com](http://www.dtw1991.com)
- [www.diligense.com](http://www.diligense.com)
- Leisure travel insurance
  - <https://travel.dtw1991.com/dtwLogin.jsp>
  - <https://travel.dtw1991.com/propLogin.jsp>

### 3 Other privacy information you might find useful

The Coverys Privacy Notice can be viewed by visiting [this page](#).

The Lloyd's Market Association ("the LMA") provides information on how personal data is used and shared by insurance market participants. This guidance is called the 'London Market Core Uses Information Notice' and is available on the LMA website ([www.lmalloyds.com](http://www.lmalloyds.com)).

### 4 What Information do we collect about you?

The personal information we collect about you consists of the information you and others provide to enable us to:

- provide you with the insurance from which you or others benefit,
- administer and pay claims,
- enter into commercial contracts with you.

We collect 'personal data' which is information about you, which may include:

- your name,
- address,
- date of birth,
- qualifications and experience,
- information relating to your financial history including County Court Judgements, bankruptcy proceedings and Individual Voluntary Arrangements,
- risk specific information including claims history about you and your business.

We may also collect more sensitive data, called 'special category data', principally being:

- information on your physical or mental health ,
- information relating to criminal convictions and offences committed by you.

### 5 How do we collect information about you?

We collect personal information about you from a variety of sources, including:

- information you provide to us directly, including information provided on our website or that you give us when corresponding with us by email, by telephone or by post,
- from third parties, which may include your employer, broker, agent or representatives, family members, medical professionals and hospitals,
- from individuals who make applications on your behalf with your permission, or on behalf of a group(s) of people,
- from our coverholders,
- from claim handlers and other experts that we may use to administer or carry out our obligations to you,
- from fraud, money laundering and crime prevention services and databases,
- from publicly available information, including information posted on websites and social media.

## 6 How do we use your information?

We use your personal information, as a data controller, for the following purposes:

- to provide you with our insurance products and services,
- to communicate with you and with third parties as part of our business,
- to administer and pay claims,
- to respond to and handle your complaints
- to notify you about changes to our products, services and the applicable terms and conditions,
- as part of our due diligence assessments before we enter into commercial contracts with you,
- to comply with legal and regulatory obligations,
- to detect, investigate and prevent fraud and financial crime,
- to update and maintain client and accounting records,
- for internal analysis and research,
- to improve your experience when you use our websites,
- to manage our business operations and comply with internal policies and procedures.

### **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 and services previously purchased by you.

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.

In accordance with data protection legislation, we use your data where we have a legitimate legal basis to do so. These are listed below:

- **Legitimate Interests**  
Where we have an appropriate, legitimate business need to use your personal information such as maintaining our business records, developing and improving our products and services, providing you with an insurance policy or service(s), handling and paying claims.
- **Legal Obligation**  
Where we have a legal or regulatory obligation to use your information to maintain records of any dealings with you or to provide those records when obliged to do so.
- **Insurance specific exemptions**  
In some instances we rely upon a specific legal exemption to allow us to process sensitive personal information about you. This exemption applies where we need to process your information as an essential part of your insurance cover, for example, your medical history or health data.
- **Consent**  
We will occasionally ask for your consent in relation to processing your sensitive personal information. If we ask for your consent we will explain why it is necessary.

## 7 Who is your information shared with?

We may share your personal information with third parties where relevant. Your information will not be shared other than for the reasons described in this Privacy Notice. Your information will be kept confidential and will not be used for any reason other than the reasons we have described.

Your information may be disclosed to the following third parties:

- our staff, agents and contractors,
- Coverys
- our professional advisers,
- third party contractors that provide services to us, such as medical screening companies, surveyors loss adjusters, solicitors, emergency assistance providers and auditors,
- governmental bodies, law enforcement agencies, regulatory authorities, anti-fraud organisations and industry bodies and databases (where we are required to share information in accordance with applicable legislation and guidelines).
- insurance market participants such as coverholders, brokers, third party administrators, other insurers and reinsurers,
- analytics and search engine providers that assist us in the improvement and optimisation of our websites

We take your data security seriously, and we have implemented appropriate measures to ensure that your data is handled securely. 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.

## 8 How long do we retain your information?

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

The 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,
- the purposes for which we process your personal data, and whether we can achieve those purposes through other means.

For our proposers, policyholders and claimants we have different retention periods for different types of insurance policy. We do not keep your information for any longer than necessary, but certain types of insurance policy allow for claims to be made many years after the existence of the policy and therefore we need to retain your information to deal with any claims which may arise in the future.

For our business partners we collect personal information as part of our due diligence process. We will retain the information we collect for the duration of our working relationship and in line with any legal or contractual obligations.

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

## 9 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.

## 10 Your Rights

A number of rights exist which allow you to ask us to do certain things with your information. Your rights are:

- Right to be informed – You have the right to be informed about the collection and use of your personal data. This Notice provides you with this information.
- Right to access – You have the right to obtain a copy of your personal data from us.
- Right to rectification – If we hold inaccurate information about you, you can ask us to correct it. If the data we hold is incomplete, you can ask us to consider additional information.
- Right to erasure – This right is sometimes called the right to be forgotten. You can ask us to erase your personal information.
- Right to restrict processing – You can ask us to stop processing your information. We will continue to store the data but will not carry out any further processing.
- Right to data portability – You can ask us to provide you with your data in a format which allows you to use it across different services.
- Right to object – In certain circumstances, you can object to our processing of your information.
- Rights related to automated decision making and profiling – For products where automated decision making is used, you can challenge any decision that has been made and ask us to review the outcome.

If you have provided us with consent to process specific data you can withdraw this consent at any time. In some circumstances exercising your rights, including withdrawing consent, may mean that we cannot continue to provide you with the insurance product(s) or services that we have agreed to, or we may not be able to administer or pay your claim or fulfil our contractual obligations. If this is the case, we will make you aware of the consequences of processing your request so that you can make a fully informed decision. Withdrawal of your consent will not affect the lawfulness of any processing that took place before your consent was withdrawn.

Not all of the above rights are absolute, which means that we may not have to comply with all aspects of your request. If this is the case, we will explain the reasons for our decision.

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

## 11 Changes to this Privacy Notice

We may change the content of this Notice from time to time without further notice. Any changes will be highlighted to you in an updated Privacy Notice and the latest version will always be hosted on our website [www.dtw1991.com](http://www.dtw1991.com).

## 12 Use of Cookies

In order to improve our service to you, we will occasionally use a cookie and/or other similar files or programs which may place certain information on your computer's hard drive when you visit the website. A cookies is a small amount of data that our web server sends to your web browser when you visit certain parts of the website. We may use cookie to:

- Allow us to recognise the PC you are using when you return to the website so that we can understand your interest in our website and tailor its content and advertisements to match your interests (this type of cookie may be stored permanently on your PC but does not contain any information that can identify you personally),
- Identify you after you have logged in by storing a temporary reference number in the cookie so that our web server can conduct a dialogue with you while simultaneously dealing with other customers (your browser keeps this type of cookie until you log off or close down your browser when these types of cookie are normally deleted; no other information is stored in this type of cookie),
- Allow you to carry information across pages of the website and avoid having to enter that information again,
- Enable us to produce anonymous statistical information which helps us to improve the structure and content of the website,
- Enable us to evaluate the effectiveness of our advertising and promotions.

Cookies do not enable us to gather personal information about you unless you give the information to our server. Most internet browser software allows the blocking of all cookies or enables you to receive a warning before a cookie is stored. For further information, please refer to your internet browser software instructions or help screen. Alternatively, information on deleting or controlling cookies is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 13 How to contact us

If you have any questions about how we collect, store or use your personal 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](mailto:data.protection@coverys.co.uk) or at:

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

## 14 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 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 at <https://ico.org.uk/>

Outside of the UK, If you would like details of the appropriate authority that supervises our processing of your personal data, please contact us using the details set out in the *How to contact us* section.



**DTW1991**  
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