

Grove & Dean Ltd (Company No. 1167043) trading as Tollgate Private Clients (**we**) are committed to protecting your personal data and respecting your privacy.

Introduction

This policy (together with any terms of use provided by us for using Our Sites (defined below)) applies to your use of:

- Tollgate Private Clients Insurance App (**App**) available on APP Store & Google Play (**App Site**) once you have downloaded a copy of our App onto your mobile telephone or handheld device (**Device**).
- Any of the insurance services or other insurance products provided by us or the use of any online insurance account we operate for you allowing you to access and manage your insurance documentation (**Services**) that are available on the App Site or one of our associated websites or applications (**Associated Sites**), unless the terms of use states that a separate privacy policy applies to a particular Service, in which case that privacy policy applies. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The App is not intended for use by children.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This policy is provided below. You can download a pdf version of the policy [here](#).

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Who we are

Grove & Dean Ltd is an insurance intermediary, which means that we arrange, advise on and assist in the administration of non-investment insurance contracts and provide credit broking services.

We are responsible for processing your personal data when you use our Services and Our Sites (as defined below), and would be considered the controller for the purposes of data protection legislation.

If you have any questions about this privacy policy, please contact:

The Data Access Team
Grove & Dean Ltd
7 Station Lane
Hornchurch
Essex
RM12 6JL

Or email customer.care@grove-dean.co.uk

What this Privacy Policy covers

This Privacy Policy sets out how we will process your personal data when you use our Services including when you use our App or Associated Sites (where appropriate our App and Associated Sites will together be referred to as **Our Sites** in this Privacy Policy). Our App and any online insurance account we have provided you with access to, has been designed for customers of ours who have purchased an insurance policy through us and use our Services.

We keep our Privacy Policy under regular review and it is updated from time to time, for example, if our business activities or legal requirements change. Where such update has taken place, any new policy may be displayed, on-screen, and you may be required to read and accept the changes to continue your use of Our Sites or the Services.

Certain Services include social networking, chat room or forum features.

Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

Information Provided by you about third parties

If you provide us with another person's personal data, you should send them a copy of this Privacy Policy (you can do so by clicking [here](#)). Please note that you should obtain the consent of any person whose personal data you provide us with and in your provision of their information to us you are confirming you have done so.

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Third party links

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers, affiliates and other third parties. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

Contact Details	Name, address, email address, telephone number
Individual Details	Marital status, date and place of birth, nationality, employer, job title, family details including the details of any children you may be the responsible guardian for
Official Body Data	Identification numbers issued by government bodies or agencies, including your national insurance number, employers reference number, passport information, tax and driving licence information, utility bills, certificates of incorporation (if required to for a business account), information from the electoral roll, bankruptcy and insolvency details, county court judgment register,
Property or Vehicle and Driving Information	Details of a vehicle's ownership including the V5 certificate, photographs of your vehicle, garaging details, mileage details, details of valuable items, MOT status and milometer readings, Claims and Underwriting Exchange (CUE), telematics data. Details of your home or property and other risk information such as geological information, flood information for example.
Financial and Transaction Information	Bank account and payment card details, payment history, income, expenditure or other financial information
Policy and Claim Information	Information about the quotes you receive and the policies you arrange, information about previous and current claims (including unrelated insurances) which may include data about your health, criminal convictions and surveys. This will include any no claims discount you inform us of
Usage and Device Data	Details of your use of any of our Apps or your visits to any Associated Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access, details of your mobile device and its software (e.g. browser and operating system), application data caches and browser web storage (including HTML5), browsing behaviour, location, IP address and other details obtained via cookies or similar technologies

Telephone Call Data	Call recording of any telephone calls made to us and Calling Line Identification (CLI) information.
Video Footage Data	If you attend our office you may be recorded by CCTV system Where you have purchased a Service which is conditional upon the use of a Dashboard Camera (Dashcam) we will record video footage
Location Data	Your current location disclosed by GPS technology
Criminal Conviction Data	Criminal conviction data
Special Categories of Personal Data	Health information, racial or ethnic origin data, sexual orientation data

Information about children

On occasion we may need to collect personal information about children. A child may be included under a policy of insurance and covered by the Services we provide or we may provide insurance cover to a young person between the ages of 16 and 18. Where we do collect personal information about children we take care when collecting such information to only collect information strictly necessary to allow us to obtain an insurance policy or quote for a child. We may also process information in respect of a child in the event that any insurance claim relates to a child. Again, we will do our best to minimise the information collected.

Where we collect any such information, we require the person providing the same to have authority to do so.

Authorised Contacts

For some customers, including those who may be considered vulnerable, you may nominate a person to act on your behalf. Where you do this we may need to process Contact Details and Individual Details of this person to allow us to work with them.

Aggregated Data

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website or App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information you consent to giving us about when using our services including Our Sites or by corresponding with us (for example, by telephone, email or webchat). It includes information you provide when you register to use the App Site, download or register an App, purchase any of our Services, submit or request a quote for our Services, search for an App or Service, make an in-

App purchase, share data via an App's social media functions and when you report a problem with an App, our Services, or any of Our Sites.

- **Information from third parties.** Contact Details, Individual Details, Property or Vehicle and Driving Information, Policy and Claim Information, Financial and Transaction Information will be provided by any comparison website who you allow to share your information with us, claims agencies, law enforcement agencies, loss adjusters, loss assessors and legal representatives, any other insurance broker acting for you and any other third party who we are provided your personal data to allow us to administer our Services which will include your insurance policy and any claim related to such policy.
- **Information we collect about you and your device.** Each time you visit one of Our Sites we will automatically collect personal data including Usage and Device Data. We collect this data using cookies and other similar technologies. Please see [our Cookie Policy](#) for further details.
- **Location Data.** Our Apps may also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your settings.
- **Information we receive from other sources providing technical information.** We will receive personal data about you from various third parties and public sources as set out below:
 - Usage and Device Data for example from the following parties:
 - analytics providers such as Google;
 - SessionCam for analysis - SessionCam is a product that has been developed by SessionCam LTD. SessionCam may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. The information collected does not include bank details or any sensitive personal data. Data collected by SessionCam from our websites is for our internal use only. The information collected is used to improve our website usability, improve our marketing strategies and customer journey and for anti-fraud purposes. It is also stored and used for aggregated and statistical reporting.
 - Individual Details, Financial and Transaction Information from providers of technical, payment and delivery services for example Experian and Lexis Nexis.
 - Official Body Data, Property or Vehicle and Driving Information, Policy & Claim information from information providers for example Motor Insurance Bureau (**MIB**), the Driver and Vehicle Licensing Agency (**DVLA**) and the Claims and Underwriting Exchange.

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Cookies

For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy [Cookie Policy](#).

How we use your Personal Data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Marketing communications

Grove & Dean Ltd operates a number of different trading names and you may receive communications under any of these names. Our trading names include:

- GGFi (Corporate Division)
- Grove & Dean Motorsport Insurance
- Grove & Dean Corporate Insurance
- Grove & Dean Private Clients
- InstallSure Corporate Division
- It's Compare Insurance Services
- It's Horsebox Insurance Services
- It's Campervan Insurance Services
- It's Classic Car Insurance Services
- It's Motorhome Insurance Services
- It's Quad Bike Insurance Services
- Motor Vision Insurance Services
- Performance Direct
- Performance Direct For Business
- Performance Direct Prime
- Performance Direct Silver
- Tollgate Private Clients

We will only send you direct marketing communications by email, post, telephone or text if we have your consent. You have the right to withdraw that consent at any time by contacting us at opt-out@grove-dean.co.uk. If you change your mind about how we may contact you,

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you can also manage your preferences at any time by emailing us at mypreferences@grove-dean.co.uk.

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We use cookies and JavaScript for marketing purposes on our Associated Sites to track behaviour, target customers, enrich a customer’s profile and enable personalised content. We will ask for your consent to do this. For more information please refer to our Cookie policy. You can opt-out at any time by using the opt-out process described above.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Purposes for which we will use your Personal Data

	Brief details of purpose	Further details including examples of where sharing personal data may be required	Type of data	Lawful basis for processing
1	To install our App and register you as a new App user	When you install our App from the relevant store we will need certain types of data to allow you do this.	a) Contact Details b) Individual Details c) Policy and Claim Information	Consent
2	Obtain and provide quotations and arranging your insurance cover, including processing renewals, adjustments and checking no claims discount and generally administering the Services purchased through us	As an insurance intermediary we will use the personal details provided to try and obtain a competitive insurance quote from our insurance providers. This will include using Special Categories of Personal Data and Criminal Conviction Data to allow us to do this. To allow us to get a quote we use automated decision-making (further details of what this means is set out in more detail in this Privacy Policy below and you can click [HERE] to go this). To minimise potential fraud we use your Usage and Device Data, and where you have specifically consented, your Location Data to help us. Insurers are legally required to provide details of motor insurance policies to the Motor Insurance Database (MID) managed by the MIB. MID data may be used by certain statutory and authorised bodies including but not limited to the Police, the DVLA, the Driver and Vehicle Licensing Northern Ireland (DVANI), the Insurance Fraud Bureau and other bodies permitted by law. Insurers also share information with each other via the CUE Register, and the Motor Insurance Anti-fraud and Theft Register (MIAFTR), and other data bases (including our own). This exchange of information enables us	a) Contact Details b) Individual Details c) Official Body Data d) Property or Vehicle and Driving Information e) Financial and Transaction Information f) Policy and Claim Information g) Usage and Device Data h) Telephone Call Data i) Location Data j) Special Categories	Consent Performance of a contract with you Necessary to comply with legal obligations Necessary for our legitimate interests

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		<p>and insurance companies to verify the information that is provided during the quote or claims process (including information about any third party who is named on the policy) and help prevent fraud.</p> <p>We will generally undertake searches on your credit file to check your identity, assess affordability and credit worthiness, make decisions on whether to offer insurance products or services, credit scoring, to help prevent fraud and money laundering, when you apply to use our Services and will use credit reference agencies to do so and may also contact insurance providers, premium finance providers, and fraud prevention agencies or services. To do this we will need to provide such credit reference agencies with your Contact Details, Individual Details, Official Body Data, Property or Vehicle and Driving Information and Financial and Transaction Information.</p> <p>You should be aware that any insurance providers we approach for Services may also perform these checks as well.</p> <p>Credit checks are registered as general insurance searches. They will appear on your credit report and may be viewed by other companies when you apply for credit or insurance. These searches should not harm or adversely affect your credit profile.</p> <p>We will use in App-messaging and push notifications to contact you about important information relating to our Services, including when it your insurance policy is due for renewal.</p> <p>Whilst we appreciate that some of the processing carried out here may feel intrusive, we cannot provide you with a quote without undertaking this processing.</p>	<p>of Personal Data</p> <p>k) Criminal Conviction Data</p>	
3	Where you provide us with your driving licence number (Official Body Data)	<p>If you provide your driving licence number this may be passed to the DVLA for a search to be carried out to confirm your (or any named driver's) licence status, entitlement and relevant restriction information and endorsement/conviction data.</p> <p>Searches may be carried out as part of your quote and at any point throughout the duration of your insurance policy. A search with the DVLA will not show on your (or the named driver's) driving licence record. For details relating to information held about you by the DVLA, please visit https://www.gov.uk/view-driving-licence.</p>	<p>a) Official Body Data</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests</p>

		<p>Undertaking searches using your driving licence number helps insurers check information to prevent fraud and reduce incidences of negligent misrepresentation and nondisclosure.</p> <p>We or your insurer may also request your (or another relevant person included on the proposal/insurance policy) driving licence information, licence share code and/or a copy of the photocard at any time, for example when a claim arises or in order to validate information you have provided.</p>		
4	Recovery of sums owed to us/debt collection	<p>Where we are having difficulties obtaining payment from you in respect of the Services we will attempt to recover any such outstanding sums from you.</p> <p>On occasion we may pass any debts owed by you, to a third party debt recovery service.</p>	<ul style="list-style-type: none"> a) Contact Details b) Individual Details c) Policy and Claim Information d) Financial and Transaction Information 	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests</p>
5	Claims processing or assisting you in your claim	<p>When we assist you with a claim, we will process your personal data and share it with third parties to allow us to manage the process and try to successfully resolve any claims as efficiently as possible.</p> <p>For example, we may need to arrange for your vehicle to be taken to a garage or to send you roadside assistance. In which case we will contact our preferred third providers to do this.</p> <p>We also may need to provide your personal data to government authorities and other insurance companies of any third parties involved. Please note this may include sharing Special Categories of Personal Data and Criminal Conviction Data.</p> <p>We will only share your personal data with the relevant third party for each element of processing a claim.</p> <p>If you have allowed us to, we will use your Location Data to assist us with information relating to any incident that has taken place. As use of such Location Data allows us to pinpoint more precisely exactly where you are we find that this can have an impact on how effectively we can deal with claims.</p>	<ul style="list-style-type: none"> a) Contact Details b) Individual Details c) Official Body Data d) Property or Vehicle and Driving Information e) Financial and Transaction Information f) Policy and Claim Information g) Usage and Device Data h) Location Data i) Special Categories of Personal Data 	<p>Performance of a contract with you</p> <p>Necessary to comply with legal obligations</p> <p>Necessary for our legitimate interests</p>

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			j) Criminal Conviction Data	
6	Breakdown Services	<p>Where you have purchased breakdown cover from us we will need to manage this service and provide your personal details to a third party provider.</p> <p>This may include the passing of your Location Data to a breakdown cover provider so they can get to you to assist.</p>	<p>a) Contact Details</p> <p>b) Individual Details</p> <p>c) Official Body Data</p> <p>d) Property or Vehicle and Driving Information</p> <p>e) Financial and Transaction Information</p> <p>f) Policy and Claim Information</p> <p>g) Location Data</p>	<p>Consent</p> <p>Performance of a contract with you</p>
7	To process in-App purchases including managing payments and collecting money owed to us	To enable us to take payment from you we will need to use and store your payment details, particularly when we set up a direct debit.	<p>a) Contact Details</p> <p>b) Individual Details</p> <p>c) Financial and Transaction Information</p> <p>d) Policy and Claim Information</p> <p>e) Usage and Device Data</p>	<p>Consent</p> <p>Performance of a contract with you</p> <p>Necessary for our legitimate interests</p>
8	To arrange premium payment and premium finance arrangements	<p>Where we are providing credit brokering services and offer you premium finance arrangements through lenders such as Premium Credit Limited and Close Brothers Limited, we need to provide your personal data to such credit and finance agencies to allow this to happen.</p> <p>Please note any premium finance provider will perform a credit check when looking to enter into any arrangements with you.</p> <p>In terms of such arrangements we, and these lenders, are required to take special care in dealing with potentially vulnerable customers. A customer may be considered vulnerable, if for example they have recently lost their job and their income has</p>	<p>a) Contact Details</p> <p>b) Individual Details</p> <p>c) Official Body Data</p> <p>d) Property or Vehicle and Driving Information</p> <p>e) Financial and</p>	<p>Consent</p> <p>Performance of a contract with you</p> <p>Necessary to comply with legal obligations</p>

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		<p>become limited, or a customer has a condition which could impair their ability to make an informed decision in respect of entering into any arrangement for finance.</p> <p>To allow us and any lenders to ensure that we can properly assist such vulnerable customers and comply with our legal obligations, we may share with any lender if we suspect or know someone maybe vulnerable, this may consist of the sharing of Special Categories of Personal Data.</p>	<p>Transaction Information</p> <p>f) Policy and Claim Information</p> <p>g) Special Categories of Personal Data</p>	Necessary for our legitimate interests
9	Fraud prevention	<p>Fraud costs the insurance industry and customers, significant sums of money every year and we therefore are always trying to minimise the impact it has and improve our systems.</p> <p>In row 2 above you will see that we have set out a some of the processing that we carry out for fraud prevention.</p> <p>For this we will also use your Usage and Device Data, including your IP address to assist us in identifying potentially fraudulent activities.</p> <p>If we have reason to suspect fraud, or we have concerns with the truthfulness of the responses and accuracy of the personal data we are provided, we may exchange it with others, for example, other insurers (including their agents or service providers), credit agencies, premium credit finance, and fraud prevention agencies or other authorities, for example the Police.</p> <p>To help us check your identity and evaluate insurance risk we use LexisNexis. More information on how they collect and process your data, your right to object and other data protection rights can be found here https://risk.lexisnexis.com/group/processing-notice/insurance-services</p>	<p>a) Contact Details</p> <p>b) Individual Details</p> <p>c) Official Body Data</p> <p>d) Property or Vehicle and Driving Information</p> <p>e) Telephone Call Data</p> <p>f) Financial and Transaction Information</p> <p>g) Policy and Claim Information</p> <p>h) Usage and Device Data</p> <p>i) Location Data</p>	<p>Performance of a contract with you</p> <p>Necessary to comply with legal obligations</p> <p>Necessary for our legitimate interests</p>
10	CCTV usage for security at our premises	<p>If you visit our offices CCTV is used for maintaining the security of property and premises and for preventing and investigating crime.</p> <p>For these reasons the information processed may include visual images, personal appearance and behaviours of those attending our offices.</p> <p>Where necessary or required this information is shared with the data subjects themselves, employees and agents, service providers, police forces, security organisations and persons making an enquiry.</p>	<p>a) Video Footage Data</p>	Necessary for our legitimate interests

11	Services which involve the use of a Dashcam	<p>We may offer Services which are conditional on the use of Dashcams. These products may include or require the use of software and hardware to make the device(s) work.</p> <p>When you purchased a Service involving the use of a Dashcam you would have consented to the Dashcam operator processing your personal information.</p> <p>To allow this Service to be arranged we will have shared your Contact Details with the Dashcam operator to allow them to arrange delivery of any necessary equipment.</p> <p>The personal information may also be shared with anti-fraud agencies and other government authorities in any jurisdiction where the Dashcam may be used.</p>	<ul style="list-style-type: none"> a) Contact Details b) Video Footage Data c) Property or Vehicle and Driving Information 	<p>Consent</p> <p>Performance of a contract with you</p>
12	Services which involve the use of a tracker	<p>We may offer Services which are conditional on the use of a tracker at all times when your vehicle is in use. These products may include or require the use of software and hardware to make the device(s) work.</p> <p>When you purchased a Service involving the use of a tracker you would have consented to the tracker operator processing your personal information.</p> <p>To allow this Service to be arranged we will have shared your Contact Details with the tracker operator to allow them to arrange delivery of any necessary equipment.</p> <p>Our trackers are providers by Tracker Network (UK) Ltd, and you can review its full privacy notice here https://www.tracker.co.uk/privacy.</p> <p>If your vehicle is stolen, when you have reported the theft to the police and to Tracker Network (UK) Ltd, Tracker Network (UK) Ltd will liaise with the police and share your information and details of the device's location information with them, for the purpose of recovering your vehicle.</p>	<ul style="list-style-type: none"> a) Contact Details b) Property or Vehicle and Driving Information c) Location Data 	<p>Consent</p> <p>Performance of a contract with you</p>
13	To deliver content and advertisements to you, to make recommendations to you about goods or services which may interest you, to measure and analyse the effectiveness of the advertising we serve you and to monitor trends so we can improve our App		<ul style="list-style-type: none"> a) Contact Details b) Individual Details c) Policy and Claim Information d) Usage & Device data 	<p>Consent</p> <p>Necessary for our legitimate interests</p>

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14	Trustpilot	Trustpilot is a website which allows consumers to review businesses and the services and/or goods they provide. We use Trustpilot to help improve our customer experience.	a) Contact Details	Necessary for our legitimate interests
15	To administer and protect our business, websites and Apps including troubleshooting, data analysis and system testing	We may record information about your computer or mobile device, including hardware and software used and general location when you use or interact with our websites. We use this information to note your interest in our websites, the products and services we offer, and to improve our marketing strategies, customer journeys, and for anti-fraud purposes.	a) Contact Details b) Financial and Transaction Information c) Policy and Claim Information d) Usage and Device Data e) Location Data	Necessary for our legitimate interests For Location Data only – consent
16	Generally improving our processes: Help train our staff and improve our customer service, websites and data bases Help us understand our customers and prospective customers Ask you to provide feedback to us on the products and services we provide Identify risk and manage risk exposure Develop, improve, and personalise the products we offer Develop and improve pricing and underwriting and risk selection strategies and processes Develop and improve our administration, security systems and insurance applications Promote responsible lending and help prevent over-indebtedness		a) Contact Details b) Individual Details c) Official Body Data d) Property or Vehicle and Driving Information e) Financial and Transaction Information f) Policy and Claim Information g) Usage and Device Data h) Telephone Call Data i) Location Data	Necessary for our legitimate interests For Location Data only – consent

Automated decision-making

In the provision of our insurance products, we will carry out automated decision-making to determine the basis upon which we are able to provide you with insurance, including whether or not we are able to offer you the option to pay for Services on a monthly credit basis. We will use all personal data we hold about you, which will include personal data collected from third party sources, to administer your insurance product.

We are unable to provide a quote or insurance products to you unless we carry out such automated decision-making as we need this process to allow us to calculate your insurance risk and therefore premium.

We carry out checks to validate the data we have collected about you (e.g. to confirm your identity) and enrich it with data from third party sources. Information about third party data sources is set out in How is your personal data collected? For example, when you input your vehicle registration number and date of purchase we will source information on the car you drive and how long you have owned it for, if you input details of your home we will source information about the possible rebuilding cost.

We may also use automated decision-making to help us tailor our marketing to you and ensure we make you aware of the most appropriate Services.

Disclosures of your personal data

When you provide us with your personal data, we will share your personal data with the third parties set out below for the purposes set out in the Privacy Policy:

- Internal Third Parties which includes other companies in the Grove & Dean Group.
- External Third Parties such as those listed below by way of example:
 - Underwriters;
 - Insurance companies of those we may suggest you purchase a policy from;
 - Insurance companies of third parties whom who may be involved in a claim with;
 - DVLA;
 - Professional advisors and auditors;
 - Law enforcement agencies;
 - Claims handlers;
 - Ombudsmen;
 - The MID and MIB;
 - Credit reference agencies;
 - Premium Finance providers and lenders;
 - Card payment processors;
 - Debt collection services;
 - Mechanics, garages and body work specialists;

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- Breakdown services;
- Any other party as referred to in this privacy notice.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

In the performance of our activity as an insurance intermediary we may from time-to-time act as a Data Processor, for example where we collect or return premiums, or notify claims. We may also act under contract in order to service or administer insurance policies on behalf of other insurers or insurance intermediaries. Data Protection Laws set out that firms that process personal data must ensure they meet their relevant obligations. We ensure that when we act as a data processor, we have a suitable contract in place that describes our obligations in order to meet the requirements of the applicable data protection laws and regulations.

No Claims Discount database

We may use your no claims discount information to check your entitlement, examine the potential risk in relation to your prospective policy and help prevent fraud. If we do this your information will be checked against the MIB database. Such searches may be carried out against you or the relevant person included on the proposal and may be carried out at point of quote and, if a policy is incepted, at the renewal stage.

To perform these searches, we may exchange information about you with LexisNexis Risk Solutions. The purpose is to check your entitlement and eligibility for a no claims discount and assist with identity verification, the prevention of fraud and risk analysis. Because checks can be made for named drivers you must inform any drivers you name know before sharing their information with us.

For privacy information and full details about the services LexisNexis provide to us please visit <https://risk.lexisnexis.com/group/processing-notices/insurance-services>

International transfers

Some third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK, for example our software may be supported by companies outside of the UK.

Whenever we transfer your personal data out of the UK, we try to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.

Data security

All information you provide to us is stored on our secure servers. Payment transactions carried out by us or our chosen third-party provider of payment processing services comply with PCI DSS security standards. Where we have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

Data retention

By law we have to keep your information for six years after you cease being a customer to comply with our various obligations. In some circumstances we may need to keep your information longer, for example if there is a claim, dispute or other legal obligation.

In some circumstances you can ask us to delete your data, see below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In the event that your insurance policy is cancelled or lapsed access to Our Sites and any accessible online accounts held by us shall cease.

Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data:

- **Request access** to your personal data (commonly known as a "data subject access request").
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of your personal data.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;

- where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party.
 - **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide our Services to you or it may change the basis upon which we provide Services. We will advise you if this is the case at the time you withdraw your consent.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us using the information at the start of this Privacy Policy, which can be found [here](#).

Complaints

If you have any concerns about the way we process your personal information please contact us in the first instance. You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator for data protection issues:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 or 01625 54 57 45
Website: www.ico.org.uk

Changes to your information

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Commented [PK6]: For us: Link to details of the data access team above