

# Voyager Insurance Services Ltd. Privacy Notice Last Updated: May 2018

In accordance with the General Data Protection Regulation (GDPR) and related UK data protection legislation Voyager Insurance Services Ltd. is required to inform you how we collect and use your data and your rights concerning the data you have provided us including rectifying any incorrect information. This Privacy Notice applies to any website or service which references this Privacy Notice.

This Privacy Notice is designed to help you understand how Voyager Insurance Services Ltd. collects and uses your information. We are committed to protecting the confidentiality and security of the information that you provide to us.

Our Privacy Notice may change from time-to-time, for example to comply with legal requirements and therefore you should review it regularly. We will of course notify you of any changes where we are required to do so.

#### Who We Are:

Voyager Insurance (also referred to in this notice as "we", "us" or "our") means Voyager Insurance Services Ltd. (a company Incorporated in England with Company Registration Number: 03251842. Voyager Insurance Services Ltd. is authorised and regulated by the Financial Conduct Authority (Firm Reference No. 305814).

### How to Contact Us:

For any questions or concerns relating to this Privacy Notice and our data protection practices, or to make a subject access request or any other request regarding the information we hold, please contact us at:

Data Protection Officer Voyager Insurance Services Ltd. 13-21 High Street, Guildford, Surrey GU1 3DG

Email : data@voyagerins.com or Telephone : 01483 806 680

## Types of Data We Collect:

When you submit your data using any of Voyager Insurance's websites or by telephone, you agree to us collecting and using this information for the purposes described in this Privacy Notice. We only collect, use and store your information where we have lawful grounds and business related legitimate interests to do so. Some data uses require your explicit opt-in before being submitted.

- **Personal Data** Personal data is any information that may identify a living individual. We collect personal information such as name, contact details, date of birth and gender depending on the nature of the insurance and other services we offer.
- Special Categories of Data Relating to Sensitive Personal Information Some of the personal information provided by you may be classified as falling within special categories of sensitive personal data, as defined by the current Data Protection legislation, such as information about health or criminal convictions. We will not use such personal sensitive data except for the specific purpose for which it was provided and to provide the services in



this policy. The provision of such data is conditional for us to be able to provide insurance or manage a claim.

If you provide us with information about another person, for example another family member on a family travel insurance policy, you are confirming that they have appointed you to act on their behalf to consent to the processing of their personal data, including special category data, such as medical conditions, and that you have informed them of our identity and the purposes (as set out in this Privacy Notice) for which their personal data will be processed.

#### Transfer of Personal Data Outside the UK:

Certain personal information held on our Information Technology systems may be transferred across geographical borders in accordance with applicable law.

By providing us with your information, you consent to the collection, international transfer, storage, and processing of your information. These transfers are governed by European Union (EU) standard contractual clauses or equivalent data transfer agreements to protect the security and confidentiality of personal information.

If you are visiting any of our websites from outside the UK your visit will necessarily result in the transfer of information across international borders. By visiting this site and communicating electronically with us you are consenting to these transfers.

#### Why We Collect Data:

Voyager will use the personal data (including any special category data) submitted to us to provide you with our services:

- 1. quotes for our products and the ability to purchase policies based on this information
- 2. for administration and customer services in relation to a quote or purchased policy
- 3. to analyse your preferences & website usage and display online advertising based on your web behaviour
- 4. to ensure that post-sale content, services and advertising offered are tailored to your needs & interests and to enable you to leave customer feedback.

We will keep your information for a period of 7 years for purposes 1 & 2 (for quote data this is reduced to 2 years) at which point it will be securely destroyed. We may need to share your information with third parties involved in the administration and servicing of your quote or policy including: insurers, service providers, agents and introducers for the above purposes, for example to aid processing a claim. Voyager Insurance may disclose your personal data to comply with a legal or regulatory obligation.

For purpose 3 your data is collected anonymously using 'cookies' via our websites and for purpose 4 you will have to opt-in to allow us to contact you from time to time to update you with relevant news and to inform you of other Voyager Insurance products that we think you may be interested in. You will have the right to opt-out of purpose 4 at any time by clicking the 'unsubscribe' link in any emails or by emailing <u>marketing@voyagerins.com</u>.

We use information obtained from other reputable sources which operate in accordance with the GDPR to comply with our legal and regulatory obligations:

Insurers pass on information to the Claims and Underwriting Exchange Register (CUE), run by the Insurance Database Services Ltd (IDS Ltd) and the Motor Insurance Anti-Fraud and Theft Register (MIAFTR) run by the Association of British Insurers (ABI). The aim is to help us to check information provided and also to prevent fraudulent claims. When Voyager Insurance deals with a request for insurance, we may search these registers.



#### How We Collect Data:

Voyager Insurance will collect personal and sensitive data through different sources including data submitted through forms on our websites, telephone calls and application or quote request forms.

Voyager Insurance uses 'cookies' to collect information about how our websites are used. A cookie is a very small text file placed on your computer by a web browser, which has been sent by a web server. Some cookies require your explicit opt in to collect and process your data. Information gathered using cookies is used to improve how our websites cater for your needs and identify any technical problems.

Any of our sites that offer online shopping may also use cookies to remember and process the items in your shopping cart and where permitted, we may associate personal information with a cookie file in such instances.

If you don't want cookies, you can set your computer to warn you each time a cookie is being sent or turn off all cookies through your browser (e.g. Internet Explorer, FireFox, Safari or Chrome). Check your browser's help menu to learn how to change or update your cookie settings.

<u>Please note</u>: if you disable cookies, you may be unable to access some of the features of our websites.

When you visit our site, we may also log your IP address, a unique identifier for your computer or other device you use to access the Internet. In these instances we will ask for your explicit opt in to record this data.

Some of Voyager Insurance's web pages and e-mails may contain electronic images called web beacons (these can also be known as tracking pixels, pixel codes or pixel tags). When they are used on websites, web beacons allow us to count visitors who have viewed specific web pages and pass anonymised data for analytical purposes; in e-mails or newsletters web beacons allow us to count how many subscribers have read them.

Web beacons are used by Voyager Insurance to develop anonymous statistical information about marketing activities and the features that interest consumers with the aim of providing targeted content.

Web beacons will not be used to access personally identifiable information without your consent.

Telephone calls may be monitored and/or recorded for training and compliance purposes.

#### Who We Supply Data to:

We may need to supply your personal information to third parties, but we will only do so to those organisations involved in the introduction of business, administration or servicing in connection with any product you may buy from us. This includes insurers, agents, introducers, claims handling and emergency assistance.

These third parties may use your information for purposes such as statistical and trend research and analysis which may include computerised processes which profile you. Automatic profiling helps them to understand, predict and forecast trends in insurance products.

Where you have opted in to provide feedback or to receive marketing communications from us your data will be securely uploaded into our nominated service providers system. Our current nominated providers are:

- Customer Feedback Feefo <u>www.feefo.com</u>
- Customer Email Communications Pure360 <u>www.pure360.com</u>



We may also provide your personal details to regulatory or law enforcement bodies if legally required to do so.

If you have applied for a product there may be some circumstances where we are unable to provide a quotation in which case we will ask for your permission to forward your details to a carefully selected third party with the aim of providing the quotation you have requested.

We will **NOT** sell or pass on your data to a 3<sup>rd</sup> party for marketing purposes.

## Your Rights:

You have certain legal rights under UK data protection law and regulations, summarised as follows:

- The right to be informed about our data processing activities, including through Privacy Notices such as this.
- The right of access to the personal information we hold about you. To request a copy of this information you must make a subject access request in writing to us.
- **The right of rectification**. You may ask us to correct any inaccurate or incomplete data within one month.
- The right to erasure and to restrict processing. You have the right to have your personal data erased and to prevent processing except where we have a legal obligation or legitimate interest to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide products and services.
- The right to data portability. On your request, we will provide you with your personal data in a structured format.
- **The right to object**. You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing or research purposes.

Email : data@voyagerins.com or Telephone : 01483 806 680

Or write to:

Data Protection Officer, Voyager Insurance Services Ltd. 13-21 High Street, Guildford, Surrey, GU1 3DG

#### Contacting Voyager Insurance in Relation to your Rights:

If you have any questions in relation to your rights regarding your data, you can contact Voyager Insurance by using the detail or the address above.

Where you have provided specific consent to the use of your personal data, such as consent for marketing, you may withdraw this consent, subject to the terms in this Privacy Notice.

#### How to Make a Complaint:

If you wish to make a complaint about how we hold or use your data, please contact us at the address above.

If you are dissatisfied with how we deal with your complaint, you may contact the Information Commissioner's Office:



The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone : 08456 30 60 60 or Website : <u>www.ico.gov.uk</u>