

Privacy Statement

This Privacy Statement details our policies and procedures in relation to the personal data we process. Haven Claims are committed to processing data in accordance with the General Data Protection Regulation (“GDPR”) and the UK Data Protection Act 2018 (“DPA”).

Key Definitions

Data Controller	A Data Controller determines the purpose and means of processing personal data.
Data Processor	A Data Processor is responsible for processing data on behalf of the controller.
Personal Data	Any information relating to an identifiable person who can be directly or indirectly identified.
Special Categories of Personal Data	Genetic Data, Racial or Ethnic Origin, Political Opinions, Religious or Philosophical Beliefs, Trade Union Membership, Biometric Data, Health/Medical Data, Sexual Orientation.
Criminal Offence Data	Personal data relating to criminal convictions and offences criminal allegations, proceedings or convictions or related security measures.
You or Your	Means the individual whose personal data we are processing.
We, Our or Us	Means Haven Claims

Data Controller

Prospect Legal Limited – trading as Haven Claims
Suite 2a, Second Floor
160 London Road
Sevenoaks
Kent
TN13 1BT
United Kingdom

Telephone: 01732 747100
Email: dataprotection@havenclaims.co.uk

Processing

We use Your Personal Data for the following purposes:

Claims Handling

We process Your Personal Data in order to record and handle your insurance claim. This may include sharing your Personal Data with:

1. Industry Regulators to monitor and enforce Our compliance with any applicable regulations.

2. Your broker, insurer and their reinsurance providers.
3. Third parties involved in a claim, including their insurer, solicitor, or representative.
4. The Compensation Recovery Unit, Department for Work and Pensions, and National Health Service in relation to a claim.
5. The Financial Ombudsmen Service, if You make a complaint about the service We have provided.
6. The Motor Insurance Anti-Fraud and Theft Register, Motor Insurance Database and the Claims and Underwriting Exchange Register, all administered by the Motor Insurance Bureau (MIB).
7. DVLA for the purposes of vehicle history and keeper details.
8. Subcontractors and service providers to process Your Personal Data and provide services on Our behalf, including claims handlers outside of the UK to handle incidents abroad.
9. The Ministry of Justice Portal to administrate injury claims.
10. HPI Ltd for the purposes of checking vehicle history, mileage, keeper details and valuations.
11. Law enforcement and fraud detection agencies.

Administration

To manage and administer Our relationship with You, including Your registrations, transactions and communications with us, to perform claims handling services, to provide the information You request, and to respond to Your comments, questions and support requests, and to monitor compliance with and enforce the terms of Our relationship with You.

Telephone Calls

We may monitor and record telephone calls for the purpose of security and training.

Complaints

To investigate and respond to complaints made in relation to insurance claim We manage.

Market Research/Data Analysis

To help improve our services we, and recipients of your Personal Data, may also use your Personal Data for the purposes of marketing research and data analysis. This helps to develop and improve the products and services that are offered.

Fraud Prevention

Before we provide services to you we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

When we and fraud prevention agencies process your personal data, we do so on the basis that we a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services you have requested.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities
- Managing credit and credit related accounts or facilities
- Recovering debt
- Checking details on proposals and claims for all types of insurance
- Checking details of job applicants and employees
- Please contact us if you want to receive details of the relevant fraud prevention agencies.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for 6 years.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services to you or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies and may result in others refusing to provide services to you. If you have any questions about this, please contact us on the details above.

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'internal frameworks' intended to enable secure data sharing.

Automated Decision Making and Profiling

We do not use any automated decision making or profiling when handling Your Personal Data.

Lawful Basis for Processing

Purpose/Activity	Type of Data	Lawful basis for processing
Claims Handling and Administration	Identity Contact Profile Financial	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to ensure claims are handled efficiently, accurately and in line with policy terms and conditions)
Telephone Calls	Identity Contact Profile Financial	Necessary for our legitimate interests (for security, monitoring and training purposes)
Complaints	Identity Contact Profile	Performance of a contract with you Necessary to comply with a legal obligation

		Necessary for our legitimate interests (for training purposes and to improve the quality of our services)
Market Research/Data Analysis	Identity Contact Technical	Necessary for our legitimate interests (to develop and improve products and services that are offered)
Fraud Prevention	Identity Contact Profile Financial	Necessary to comply with a legal obligation Necessary for our legitimate interests (to prevent fraud)

Categories of Personal Data

Included but not limited to Name, Address, Date of Birth, Residential Address and Address History, Contact Details, Claims History, Motoring Convictions, Criminal Convictions, Employment Details, Financial Information, Identifiers assigned to your computer including your Internet Protocol (IP) Address, Vehicle Details, Driving License Details, Driving Qualifications, Medical Conditions and Health Information, Residency Details, Property Details, Insurance Cover details, CCTV/dashcam footage.

Recipients of Personal Data

Depending on the type of insurance claim your Personal data may be provided to the following recipients.

Policy Administration

- Underwriters
- Brokers/Agents
- Fleet Managers

Claims Handling

- Claims Handlers
- Fleet Managers
- Fraud Prevention Agencies
- Claims Investigators
- Engineers

- Medical Assessors/Providers
- Hire Car Providers
- Repairers
- Solicitors
- Other insurers
- Reinsurers
- Salvage Agents
- Recovery Agents
- Loss Adjusters
- Windscreen Repairers

We may also receive Your Personal Data from the above parties.

We may pass Your Personal Data to other companies who process the data on Our behalf. Some of these companies may be based outside the European Economic Area. In all cases We always take steps to ensure that Your Personal Data is kept securely.

Retention Period

Claim records – 6 years (plus 4 months to allow for serving of proceedings) from the date of file closure, unless the claim involves a minor as in that case the data will be retained for 6 years 4 months from when that party turned 18.

Your Rights

Right to be informed

This Privacy Statement sets out how we will collect and use your data.

Right to access

You have the right to obtain confirmation as to whether your data is being processed, and a copy of your personal data which is being processed.

Right to rectification

You have the right for your personal data to be rectified where it is inaccurate or incomplete.

Right to be forgotten/Right to erasure

You have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

Right to restrict processing

You have the right to restrict the processing of your personal data.

Right to data portability

You have the right to obtain a copy of your personal data which you provided to us in order to transfer the data to other service providers.

Right to object

You have the right to object to:

- processing based on legitimate interests
- direct marketing (including profiling)
- processing for purposes of scientific/historical research and statistics

Rights on automated decision making – including profiling

Automated decision making may only be carried out where the decision is:

- necessary for the entry into or performance of a contract; or
- authorised by Union or Member state law applicable to Haven; or
- based on your explicit consent

Whenever we process your information on the grounds of consent you have a choice and you may notify us at any time if you wish to withdraw this consent.

If you wish to make the complaint to the Supervisory Authority in the UK, their information is detailed below:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

0303 123 1113

www.ico.org.uk