

ΣDROVER

# Privacy Policy



## Privacy Policy

### 1. Introduction

This website is owned by Drover Limited. When you interact with Drover's website and services we collect some personal data from you. The purpose of this Privacy Policy is to explain what data we collect, why we collect it, and what we do with it.

Drover is the **Data Controller** - meaning we oversee the collection and processing of your personal data. If you opt to use the insurance provided through our website the insurance provider will sometimes act as Joint Data Controller.

The **Information Commissioner's Office (ICO)** is the body that regulates data rights in the UK. More information can be found at [www.ico.org.uk](http://www.ico.org.uk). Drover Limited is registered with the ICO as a data controller under the registration number ZA185200.

Drover reserves the right to amend or modify this policy at any time to keep it up to date or in response to changes in applicable law. Any material changes will be communicated to our existing customers by email.

If you have any questions or queries about your data and privacy, please contact us at:

Compliance  
8 Orsman Road  
London  
N1 5QJ  
United Kingdom  
Email: [compliance@joindrover.com](mailto:compliance@joindrover.com)

### 2. The personal data we collect about you

#### 2.1 Data collected when you visit the Drover website

If you are reading this, then you have probably been on our website. If you are just browsing and are not logged into a Drover account then we do not collect personally identifiable information, however we do collect cookies and tracking information such as:

- IP address
- Location
- Browser
- Type of device used
- Operating system

This information helps us understand our site usage and allows us to make improvements, for example if lots of people access the site using their mobile phones, we might put extra effort in to make it mobile-friendly. None of this data can be tracked back to you – it is anonymised and used solely for analysis.

Like most other websites we collect and use cookies. These are small files saved on your device that allow us to make our website more user-friendly, effective, and secure. Most cookies are 'session' cookies and are deleted once you leave the site, however some remain until you delete them from your browser. If you want to learn more please read our [cookie policy](#).

You might have seen a chat-box on our website. If you contact Drover using this box, or if you send us an email, a copy of the interaction will be retained by our third party Zendesk.

## 2.2 Data collected from Drover customers

If you have a Drover account then we collect the following information:

### The information you provide during the sign-up process:

- Personal information including your *name and date of birth*
- Contact information including your *email address, physical address and phone number*
- Copies of documents including your *driving licence, and in some cases your proof of address and private hire certificate*
- Payment details including your *card and account details*
- Past insurance details including *past claims, motor convictions, previous accidents*

If you use Social Sign-Up to create your account, some of the information will automatically be collected from the Facebook or Gmail account you sign up with.

### Information used to approve your account

When your account is set up, Drover will perform the below checks to verify that you are eligible to use the service.

- Identity and document checks to *verify your information and confirm the authenticity of your driving licence*
- A soft credit check to retrieve your *credit score and any previous bankruptcies or county court judgements (CCJs)*. This does not show up on your credit history.
- Driving history check to confirm your *licence status, entitlement, restrictions, and convictions*
- Anti-fraud checks using *sanction lists, the electoral register, and other available databases*

Some of these approval checks are performed by third party sources such as suppliers chosen by Drover, anti-fraud databases, credit reference agencies, and the DVLA. More specific information on some of these checks can be found in Appendix One at the end of this policy.

### Communications between yourself and Drover

All interactions between yourself and Drover - by phone, email or instant messenger - are retained for a period of 5 years (or until you request we delete them). These services are hosted by Drover's trusted third parties.

### Non-anonymised web tracking

The following information is collected when you use the Drover website while logged in:

- Session details including times, dates, and pages visited
- Search history
- Vehicles viewed
- Location and IP address

This data allows us to optimise the website to your demands and needs. This also allows our sales staff to understand what you are looking for.

### Marketing Information

If you have opted in to receiving marketing material, Drover will contact you from time to time by telephone, post, e-mail or SMS to keep you informed with news, products or services, together with carefully selected offers or promotions which we feel may be of interest to you.

If you do not want to receive any further marketing material, you may change your preference in your Drover dashboard on our website.

### Subscription Information

We retain all data relating to any subscription requests you make with Drover. This includes vehicle information, dates and times, delivery details and additional drivers. Sometimes we may ask you to perform an additional affordability check before we can approve a subscription.

We also collect insurance information relating to your booking including policy number, a copy of your certificate and any insurance claims you make while in a Drover booking.

Some of our vehicles are fitted with telematics devices which provide us with vehicle tracking, usage, and risk score details. This data is anonymised for data analysis and cannot be tracked back to you without your consent.

### 3. Third parties we share your data with

Drover sometimes uses trusted third parties to process some of your data. We share your data with the following **Data Processors**

- Insurance partners and claim processors; *to administrate your insurance policy and any claims*
- Payment processors; *to process payments relating to your subscription*
- Customer service providers, *so we can answer your questions and solve any issues*
- Fleet management company, *to manage vehicle logistics and deliveries*
- Vehicle owners, *who may need to contact you in relation to your subscription*
- Data analysis software, *to perform analysis on anonymised data*
- Identity and anti-fraud services, *to verify your identity and approve your account*
- Anyone who contacts us on your behalf with your consent, *such as family, friends, lawyers*
- Marketing software, *to manage our mailing lists and promotions*
- Service providers; *such as Google and Slack for internal correspondence, Amazon Web Services who host database, and Uber if you are a PCO driver.*
- The Government, local councils, and regulatory bodies, *to ensure we meet our regulatory and legal requirements*
- Debt-recovery and vehicle-repossession firms; *to help manage arrears and trace stolen vehicles*

Drover will never transfer your data to countries that don't have an adequate level of data protection. If we transfer your data to a group or service provider outside the European Economic Area (which is under the jurisdiction of the GDPR - General Data Protection Regulation) we will ensure there is an equivalent level of protection – such as a US company covered by the UK-US Privacy Shield framework.

The data collection and processing listed above has been reviewed and approved by Drover's Compliance Team as necessary and proportionate. All processing of your personal data is justified using at least one of the following **lawful bases**:

- With your Consent
- To satisfy a Contract
- It is Drover's Legal Obligation
- It is a Vital Interest
- It is a Public Task; or
- It is in Drover's Legitimate Interests

### 4. Data Retention

Drover will retain your personal data for as long as is needed to fulfil the purpose we collected it for.

As a company authorised and regulated by the Financial Conduct Authority we have an obligation to retain your data for anti-fraud and anti-money laundering purposes. For this reason we will normally retain your data for a period of 5 years after the business relationship ends (unless otherwise stated)

We might anonymise your personal data for analytical purposes – and this anonymised data may be retained indefinitely.

## 5. Your Rights

The GDPR provides the following rights for individuals:

**The right to be informed** about the collection and use of your personal data

**The right of access** to a copy of you're the personal data we hold about you free of charge

**The right to rectification** of any inaccurate personal data we hold about you

**The right to erasure** of the data we hold about you. This right only applies in certain circumstances.

**The right to restrict processing** (i.e. to request that we limit the processing of your data)

**The right to data portability** – to receive a copy of your data in a structured and commonly used format

**The right to object** to the processing of your personal data

**Rights in relation to automated decision making and profiling** see section ## for more information

You can find more information on these rights on the ICO website [here](#). Please contact us if you would like to invoke any of these rights.

You also have the right to withdraw consent and to complain. Please contact us if you would like to do either. Alternatively you can complain directly to the ICO by contacting them [here](#).

## 6. Profiling and Automated Decision Making (ADM)

Drover performs Profiling and Automated Decision Making using the data you provide us when creating your account.

The Automated Decision Making determines your eligibility to use our services (and the insurance provided by our partners) based on a set of internal and contractual rules. We regularly review, test, and update this algorithm. You have the right to object, challenge, or request a manual review of any decision made using ADM.

The Profiling uses machine learning to predict your risk profile and to predict your behaviour on the Drover site. This helps us understand your demands and needs and allows us to offer a subscription that suits you.

## 7. Confidentiality and Security

We will always treat your personal information as private and confidential, and will not disclose it to anyone not specified in this policy unless:

- Compelled to do so by law
- Where there is a duty to the public to disclose
- Where disclosure is made at your request

Drover has strict technical and organisational measures in place to prevent unauthorised access to or loss of your data. This includes

- A suite of internal data protection policies and procedures which are regularly reviewed and updated
- We adopt the principle of [Privacy by Default](#)
- We have procedure to identify, rectify and report any breaches that do occur
- We use encryption where suitable
- Regular disaster recovery and penetration testing

## Appendix One – Approval Checks

The following checks form part of our approval process. These checks are for our joint protection and are part of Drover's obligation to ensure your eligibility and suitability for our service. These checks also help prevent crime, and identify fraud and money-laundering.

### Driving History

Your Driving Licence Number (and that of any additional drivers) will be provided to the Driver and Vehicle Licensing Agency (DVLA) to confirm:

- Your licence status
- Entitlements
- Relevant restriction information, and
- Endorsement and conviction data

This data is used for insurance underwriting purposes and for anti-fraud purposes. The search will be carried out prior to your approval on the platform and prior to the date of your booking, and can be repeated at any point for mid-term adjustments or renewals.

This search will not show on your driving licence record and the data will not be used for marketing purposes. For more information on what data is held about you by the DVLA please visit:

<https://www.gov.uk/government/organisations/driver-and-vehicle-licensing-agency>

### Credit Reference Agencies (CRAs)

We perform credit and identity checks by submitting your personal information to Credit Reference Agencies, who check the data against public records such as the Electoral Register to verify the accuracy of the information you have provided. This data helps us verify your account and prevent criminal activity, fraud and money laundering.

They also perform a soft credit check which does not show up on your credit history. This helps us assess your creditworthiness and determine the affordability of your subscription. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

You can contact the CRAs currently operating in the UK to learn more:

- **Call Credit** [www.callcredit.co.uk](http://www.callcredit.co.uk)
- **Equifax** [www.equifax.co.uk](http://www.equifax.co.uk)
- **Experian** [www.experian.co.uk](http://www.experian.co.uk)

### Fraud Prevention Agencies (FPAs)

We disclose your data to fraud prevention agencies as part of our obligation to prevent fraud and money-laundering. The FPA we use is:

*Synectics Solutions Ltd*

If you provide Drover with false information or if it is found that you pose a fraud or money-laundering risk then we reserve the right to refuse to provide you our services. A record of fraud or any risk will be retained by the FPA and this will be available to other finance providers. You must contact Synectics Solutions directly if you wish to obtain a copy of the data they hold about you.

Drover and our FPA may also allow law enforcement agencies access to your personal data to detect and investigate crime.