



Privacy Policy



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1. Introduction

Keeping your data private is a priority of ours throughout your journey with us. This privacy policy explains what we do with your data, how we collect & use your browsing information and how we may use it in the future for your benefit, in a secure & compliant way.

2. About Grove Life

Grove Life Ltd is an Appointed Representative of LifeSearch Partners Limited who are authorised and regulated by the Financial Conduct Authority. In respect of your data, Grove Life Ltd is the data controller and responsible for the personal information it holds about you for sales, administration of policies and for any marketing purposes.

You can ask for further information about the use of your personal information or if you need to raise a complaint, by contacting the Data Protection Officer with the details below.

Data Protection Officer
Grove Life Ltd
21 Goldington Road
Bedford
MK40 3LH

Email: hello@grove-life.com

3. What kinds of personal information we hold about you

We may collect and process the following:

- **Information about you** – for example name, age, gender, date of birth, nationality. We need this information to help us identify you, but also to allow us to contact you at the right time – such as when your policy needs to be reviewed or you are approaching the end of your policy term.
- **Contact information** – for example email, address, postcode and phone numbers.
- **Online information** – for example cookies and IP address (your computer's internet address), if you use our websites.
- **Financial information** – for example salary to help us determine the right type of product to advise you on or your bank details to set up the payment arrangement with your insurer.
- **Audio recordings** – for example voice recording when you contact us. Calls are recorded for monitoring purposes to help us monitor the quality of the advice you are given, continually improve our service and to protect you and your information.



- **Contractual information** – for example details about your products and benefits.
- **Family & beneficiaries' information** – for example marital status, next of kin or nominated beneficiaries.
- **Health information** such as smoker status or medical related issues relevant to applying and administering your policy.

4. How we use your information

Any information supplied to Grove Life is used to provide advice and/or recommendations for protection insurance products such as Life Insurance, Critical Illness or Income Protection. The protection policies provided are administered by Grove Life, and we will be handling the personal information you provide.

This includes any sensitive personal data such as health information which you provide as part of the application process. Where a joint application is completed, Grove Life and your chosen insurer will sometimes send application updates to the contact information you provide, this will include updates about both applicants. Where we collect and process health information, we may ask each insured person to authorise a healthcare provider to supply relevant supporting information, including, where relevant, health information about their family or personal history.

Grove Life may use personal information for the following purposes:

- Provide you with a quotation and a recommendation based on your needs.
- Apply for and set up your plan.
- Administer your plan.
- Processing refunds.
- Review your cover.
- Claims handling.
- For the prevention, detection and investigation of financial crime, including fraud.
- To verify your identity, in accordance with the money laundering regulations.
- Statistical and analytical research.
- Where necessary, to comply with legal and regulatory obligations.

We may also use your personal information for marketing purposes, but only if you have provided the relevant consent and you would still hold the right to opt out at any time. See section 5 for more information on that. We will use your information for the purposes listed above. For any other purpose, where appropriate and required, we will contact you to ask for your permission.



5. Who we may share your information with

- Grove Life Ltd, LifeSearch Partners Ltd and appointed representatives.
- Insurance companies, to provide you with the appropriate protection advice and cover. These include: Aegon, AIG, Aviva, Beagle Street, British Friendly Society, Canada Life, Guardian, Holloway, HSBC, Legal & General, LV=, One Family, Quote Me Happy, Royal London, Scottish Widows, The Exeter, Vitality Life and Zurich.
- Other organisations in order to prevent, detect or investigate financial crime or fraud.
- Approved and appointed third party service providers used to arrange and administer policies.
- Credit reference agencies.
- Relevant legal and regulatory authorities.
- Selected third party suppliers for the provision of operational and analytical systems such as call recording, quote engines, policy feature comparison services, analytical research and communication tools.
- With our business partners who you originally submitted your enquiry with (such as CompareTheMarket, Money Supermarket, Which? Etc), in order to fulfil our contracts with you and them. We carry out these activities to help understand customer behaviour, provide rewards and collectively improve our services for you now and in the future.
- Selected third party partners for the provision of marketing.
- Selected third party partners for the provision of incentives and rewards, such as vouchers, movies and meals, and other reward schemes.

6. Where we received your information from

- Information you have provided us directly through our website or by phone.
- Information you have provided through a third-party website or by phone through a carefully selected third party partner, such as third party comparison sites, insurers, introducers, lead generators, social media channels, or independent representatives. Please contact us if you require further confirmation.



7. The legal grounds we rely on to process your information

Processing Activity	Description	Lawful Basis	Special Category Condition
Servicing Life Insurance Applications and Quotations	Grove Life will contact you to arrange, apply and administer any protection policies. Your Information may be shared with selected insurance companies and approved third party service providers to arrange and administer your policy, as well as for the purposes of communicating with you.	Contract	N/A
Administering Life Insurance Applications and Policies	Grove Life will use your information to apply for protection policies. Your information will be shared with selected insurance companies as well as be used to provide you service updates and process any incentives or rewards you may be eligible for.	Contract	N/A
Ongoing policy management and retention	Grove Life will use your information to reconnect with you should your payment be rejected and to discuss your policy should it no longer be suitable.	Contract	N/A
Where data is shared with our third-party partners	Grove Life will share your basic personal details and/or policy information with the service provider (such as price comparison website or referral partner) who introduced you to Grove Life for the provision of any incentives, rewards, and for analytical purposes.	Contract	N/A
Data sharing for business analytics	Grove Life will share your information with our trusted third-party analytics system to support our ongoing service improvements.	Contract	N/A
Processing your health information	We process your health information for the purposes of quoting, applying for and administering your protection insurance application. We will only ask for health information that is related to underwriting your policy or claim	Contract	Substantial Public Interests
Marketing activities	Grove Life will share your information to selected third parties if you choose to opt into our marketing emails or choose to access our third-party services such as our Wills service or Grove Life care.	Consent	N/A
Policy review and Claims management	Grove Life will use your information to reconnect with you should we be notified of any ongoing claim to offer our support and services, and to offer review services when you contact us to advise your circumstances to have changed or a substantial period has passed since we assessed your needs.	Legitimate Interests	N/A
Targeted Advertisement	Grove Life will share your information with social media channels for advertisement purposes	Legitimate Interests	N/A
Fraud, Crime and other legal or regulatory authorities	Grove Life will share your information with agencies or regulators where we are legally obliged to.	Legal Obligations	N/A



Legitimate interests

We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of “legitimate interests” as a justification for processing your personal information. You have the right to object to our use of your personal information for these legitimate interests. If you raise an objection, we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we are continuing to process your personal information.

8. Controlling your marketing preferences

When you submit details for a protection insurance quotation through our website, through 3rd parties or other websites affiliated with Grove Life, you will be asked if you’d like to opt-in or opt-out of receiving future marketing communications from Grove Life and any of our carefully selected partners. This is recorded on our customer database.

We will only send marketing communications to you via the preferences you’ve chosen and regularly make the appropriate checks to ensure that we abide by those rules and only send communications to those who’ve requested as such.

Methods of communication for marketing will typically be (but not limited to); phone, email, text message, post.

During your protection insurance journey, Grove Life reserves the right to use any of the above communication methods to get in contact and service your enquiry, even to those who’ve opted out of marketing communications – for as long as is deemed appropriate, but not longer than 60 days.

You can opt out of receiving marketing communications at any time by contacting hello@grove-life.com

9. Information provided on another person

If you are submitting personal information about another person, then you confirm that you have their consent to provide such information and for their information to be used as set out in this notice, and that you have provided a copy of this notice to that other person.

10. Cookies and other uses of your online browsing data

When you visit one of our websites, we may collect information from you such as, your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of website traffic, such as who visits and why they visit.



We may use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website but not on your computer. Pixel tags usually work together with cookies to assist us to provide you with a more tailored service. This allows us to monitor and improve our email communications and website.

The cookies and pixel tags information is then channelled through various 3rd party web applications. Examples of the software Grove Life use are;

- Google Analytics; to help us monitor website traffic and view page-by-page behaviour. It also allows us to understand which browser type, or operating system visitors are using as well as which referring sites traffic has come from.
- We may choose to send carefully planned automated marketing emails or SMS messages. You can opt out of marketing emails & text messages at any time by contacting us on hello@grove-life.com More information is available in section 5.
- We may choose to follow up with 'remarketing' activity; banner and text adverts placed automatically on 3rd party websites and on social media. These are controlled through services such as Google AdWords, or Facebook Business Manager.

You have the right to disable cookies on your browser and install 3rd party plug-ins to prevent behavioural ad targeting. Links below are provided for your reference.

The internet industry body, the Internet Advertising Bureau, has created a website which provides detailed information and advice on cookies and pixel tags
<https://www.iab.com/guidelines>

For more on behavioural advertising visit - <http://www.youronlinechoices.com/uk/>

For more on behavioural advertising visit - <http://www.aboutcookies.org/>

At any stage, you can always contact us using the details above for any more information or help.

11. Transfer of personal information to other countries

Your personal information can be processed in countries outside of the UK and the European Economic Area, such as South Africa for the administration of life insurance applications.

Transfers outside of the UK and EEA are protected by appropriate safeguards, namely Standard Contractual Clauses and approved data protection clauses. Our collection, storage, and use of your personal data will continue to be governed by this



12. Retaining your personal information

We will retain and process your personal information for as long as necessary to meet the purposes outlined in this notice provided to you. We will keep your personal information in accordance with our internal retention policies. We will determine the length of time we keep it for based on the minimum retention periods required by Financial Conduct Authority regulation and law.

13. Automated decision making

We may use your data you provide as part of your life insurance application. This data is used to assess whether we can offer a life insurance product, to determine the premium you will pay, as well as any additional terms as specified by the insurer. Whilst we collect the data, any underwriting outcome of your application is decided by the insurer. These applications are completed by automated means and may be completed without significant human intervention, however in some cases we are able to discuss decisions in more detail and provide further detail to the underwriter. You can contact us to discuss this further by telephone or by email.

14. Your Rights

Rectification – *If any information we hold is inaccurate or incomplete you have the right to request this to be amended.*

Erasure – *You have the right to any data held is deleted. If you request your information is deleted, we will comply where it doesn't conflict with any legal or regulatory obligations that we have. Where we are unable to delete your information, the data is marked as dormant and not processed for any reason other than to provide information if requested by the FCA relating to any investigations they may undertake.*

Restrict Processing – *You have the right to restrict where we process your data where this request does not conflict with any contractual obligation we may have.*

Consent – *If we are processing your personal information with your consent, you have the right to withdraw your consent at any time. This may mean however, that Grove Life may not be able to provide you with the goods and services you requested. If you have provided your consent to receive marketing information, you have the right to opt-out at any time.*

Access – *You have the right to request a copy of the personal information Grove Life holds about you.*

Data Portability – *You have the right to transfer any data that you have provided, only when this data has been received through automated, digital means.*

Object – *You have the right to object to any direct marketing, and to any data processing where we rely on legitimate interest as our lawful ground for processing.*

To make any of these requests, please contact the Data Protection Officer using the contact details above.



15. Making a complaint

If we get something wrong, or you are not happy with our services, we always welcome the chance to help and rectify it. You can contact the Data Protection Officer using the contact details provided above or email hello@grove-life.com

You can also place a complaint with the Information Commissioners Office by contacting them at:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 (local rate) or 01625 545 745 (national rate)

This privacy notice was last updated on 20/08/2021