

Dub Dub And Away Ltd
Privacy Policy – How we use your data

About us

Dub Dub And Away (“we, us, our”) is a trading name of Dub Dub And Away Limited are committed to protecting your privacy. We take great care to ensure your information is kept safe and secure.

We can be contacted at 46a Upland Road, East Dulwich, London, SE22 9EF.

This policy explains how we will collect, store, use and share your personal information. We collect information in a number of ways including when you use our website, a third party website, submit an application form or provide information to us by post, email, social media phone or text.

At Dub Dub and Away ltd, we are committed to maintaining the trust and confidence of our visitors to our web site. In particular, we want you to know that Dub Dub And Away is not in the business of selling, renting or trading email lists with other companies and businesses for marketing purposes. We just don't do that sort of thing. But just in case you don't believe us, in this Privacy Policy, we've provided lots of detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure. Put the whistling kettle on for a cuppa and read on

Data Controllers

For the purposes of the data protection law the data controller for the services we provide to you will be Dub Dub And Away Limited. We are registered with the ICO.

When you take out contract with us then our third party Insurer will also be a data controller for the purposes of data protection law.

Depending on how you were introduced to us there may be other companies who will also be considered a data controller. This could include, for example: a comparison company or website you have used to provide you with quotes; aggregators.

Where a third party data controller is involved in the provision of the insurance and ancillary services to you, we recommend that you also review their privacy policy as this will tell you how they will process your information.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our handling of personal information. Our Data Protection Officer can be reached at tim@dubdubandaway.com.

Use of cookies

We have built our website without using cookies, a bit unusual we know in this day and age but we believe in not retaining your data in cookies, in fact the only ones we like and use are the sort you can dunk in that cup of tea you are currently drinking.

Analytics

When someone visits www.dubdubandaway.com, we use a third party service, supplied by our hosting company, Easyspace, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out useful statistics such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow easyspace to make, any attempt to find out the identities of those visiting our website.

Mailing Lists

As part of the registration process for our e-newsletter, we collect personal information. We use that information for a couple of reasons: to tell you about stuff you've asked us to tell you about; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

We use a third-party provider, MailChimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see [MailChimp's privacy notice](#). You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails or by emailing our data protection officer [Tim](#).

Who do we collect information about?

We collect information about the following types of individuals:

- Previous, current and prospective customers
- Previous, current and prospective parties covered under an insurance policy we administer
- Person's authorised to speak to us on behalf of a customer
- Third party claimants
- Witnesses to incidents
- Experts instructed in relation to claims
- Users of the Dub Dub And Away website
- Business Partners

When do we collect information about you?

We collect information about you:

- When we are providing you with a quotation when you apply for, amend or renew booking.
- On an insurance claim under our policy.
- When you contact us (by phone, email, through our website or otherwise) such as to update or check your details, complete surveys, provide feedback, fill in forms, participate in competitions or complete applications for goods/services.
- When you register to use our website, subscribe to our services, search for a product, place an order on our website, participate in discussion boards or other social media functions on our website, leave any query or correspondence on our website, enter a competition, promotion or survey or when you report a problem with our website or any other activity undertaken with Dub Dub And Away..
- From third party databases (for example claims underwriting exchange and government agencies)
- When you contact us to make a complaint.
- From third parties who are involved with the booking or insurance of a hire.

What information do we collect about you?

The personal information that we collect will depend on your relationship with us. We will collect different information depending on the type of booking you are taking out with us, and whether you are a hirer, insurance covered party or beneficiary under our policy, website user, claimant, witness, expert, or other third party.

Please note, in certain circumstances we may request and/or receive sensitive personal information about you. For example we may need access to health details or details of any unspent criminal convictions for the purposes of providing you with a policy or processing claims, or for preventing, detecting and investigating fraud.

If you provide personal information to us about other individuals you agree: (a) to inform the individual about the content of this Privacy Policy; and (b) to obtain any consent where we indicate that it is required for the processing of that individual's personal data in accordance with this Privacy Policy.

Please see below for detailed information regarding the types of personal information we are likely to collect and use about you.

Personal Information:

- General information such as your name, address, date of birth, email address , home address and phone numbers
- Financial information such as payment card or bank account information and information which is pertinent to the administration of the booking
- Personal description when necessary for the administration of the policy (for example as part of a claim investigation)
- Photograph, mobile phone, video footage or CCTV
- Your driving licence details and driving history which may include tracking information or telematics information

- Details about you and your personal circumstances where this is appropriate in the administration of your booking including for example occupation, employer, as well as other information you (or a third party) may provide to us as part of the booking process whether through phone, email, letter, or via a website, app, social media or online chat.
- We may collect information when you use our website including data that allows us to monitor your preferences and how you use our website. This helps us to organise our website content in order to improve your experience. The information we collect can include:
 - details of transactions you carry out through our website.
 - information that you provide by filling in forms on our website even if those forms are not submitted.
 - technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time)
 - products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Special Category (sensitive) Personal Information and Criminal Personal Information:

- Details about your health but only if this information is pertinent to
 - (i) the quote (for example medical conditions which are notifiable to the DVLA ,
 - (ii) policy administration (for example to help us to identify a potentially vulnerable customer),
 - (iii) a claim (for example to establish the quantum of damages sought and potentially recoverable under the policy) and
 - (iv) our insurance providers fraud prevention investigations.
- Information relating to your unspent driving convictions (including offences and alleged offences and any caution, court sentence or criminal conviction) but only if this information is pertinent to
 - (i) the quote process
 - (ii) policy administration (for example when you update us of any changes to your driving licence) and
 - (iii) fraud prevention investigations.
- We do not actively request details about your race and/or ethnicity but this information may be recorded if it is pertinent to
 - (i) a claim (for example a physical description is given at the time of the incident resulting in the claim or in a later medical report or investigator report),
 - (ii) a complaint (for example an allegation is made by you of racial discrimination)

or

(iii) our insurance providers fraud prevention investigations.

It may also be recorded if it is provided by you (or a third party) as part of the quote, policy and /or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat.

- We do not actively request details about your political opinions, religious or philosophical beliefs or trade union membership but this information may be recorded if it is provided by you (or a third party) as part of the quote, hire and /or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat.
- We do not actively request details concerning your sex life and/or sexual orientation but this information may be recorded if it is provided by you (or a third party) as part of the quote, hire and /or claim administration processes whether through phone, email, letter, or via a website, app, social media or online chat. In addition this information may be apparent from other information you have provided (for example details of your spouse if he/she is a named driver on the policy). Further this information may, in certain limited circumstances, be recorded in a medical report if that information is pertinent to a claim under the policy.

How do we collect your information?

We collect personal information from a number of different sources including:

- Directly from you or from someone else on your behalf by website, phone, email, SMS, PDA, on line chat, paper documents or in person.
- From our records
- From third parties (including brokers, aggregators, insurance companies, business partners, suppliers, payment and delivery services, third party claimants under a policy, medical representatives in the event of a claim, accident management companies, advertising networks, analytics providers, search information providers).
- Other publically available sources, including ,but not limited to, Google Earth and social media
- Through customer surveys.
- Via insurance industry fraud prevention and detection databases, as well as sanctions screening tools.
- From government agencies such as DVLA and from professional regulators.

Booking requests

When you put a request for a booking or gift voucher through our website, we ask for your name, date of travel and return, which campervan you want, your email details and any free text you care to provide to us. We use this information to create a quote for your potential campervan trip and this information is stored as an enquiry email to us at

sales@dubdubandaway.com. At no point do we share this information with any other company or person without your explicit consent.

Sharing your data

After we provide you with a quote for your campervan adventure, we also send you a booking form where we collect additional data about all proposed drivers including their driving licence number, date of birth, address and contact details, when they passed their test, any driving convictions, accidents or insurance refusals plus specific questions about their health that may affect their ability to drive a campervan. We also collect the potential names of any other passengers that will be travelling and staying in the camper plus the number of children and their ages. We use all this information to provide a final price for your adventure and to provide guidance on which camper would suit the travelling party best (for example the bunks in some campers aren't suitable for children over a certain age)

In addition, where questions arise over the suitability of hirers to drive the campervans we may share this booking form with our insurance broker and insurance providers and their privacy notices are here ([Alan Boswell](#)) ([Markerstudy](#))

We may also share your booking form with certain authorities including local councils, police, TFL, and road charging organisations if they send us a fine, ticket or penalty notice for the period whilst the campervan is in your possession.

We may also share your information with selected third parties, in order to offer services to you or to perform any necessary functions on our behalf. This may include:

- Your relatives, executors or, guardians (on your behalf where you are incapacitated or unable) or other people or organisations associated with you such as your insurance broker
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your hire and insurance (including claims and cancellation) with us and make changes on your behalf.
- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company.
- Other third parties you have asked us to engage with
- Emergency Assistance Companies
- Solicitors
 - To manage claims (whether you are an insured or a third party claimant)
 - To manage legal cases brought against us or on our behalf
 - To manage regulatory investigations
- Business partners

- Software Providers; who provide the technical infrastructure to allow us to provide your hire
- Companies engaged by us to provide aspects of our communications with you (for example, web hosting, online chat provider)
- Debt collection agencies
- Regulators and other authorised bodies, whenever we are required to do so by law.
- We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.
- We may also share your information with other Insurance Industry databases including the Motor Insurance Database. These may be accessed by police and other organisations to check the details of your motor insurance or your personal circumstances.

Disclosure of your personal information to a third party outside of Dub Dub And Away will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

Card Payments

All payment details are processed by our transaction provider Paymentsense using the highest levels of security. Paymentsense is one of the leading payment providers. Dub Dub And Away Ltd does not receive or hold personal card details for online payments. If you need further information about Paymentsense please follow this link

<https://www.paymentsense.co.uk/>

What are the purposes for which information about you is used?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing. When the information that we process is classed as special category or sensitive personal information, we must have an additional legal ground for such processing.

Whether you provide us with the information, or we collect information from you or we are provided with information from other sources, we may use this information:

a) To evaluate your hire application and provide (and follow up) a quote

Legal grounds:

- Our having an appropriate business need to use your information to provide hire and associated insurance, which does not overly prejudice you.
- Our providing your hire contract.

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of providing insurance as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

b) To set you up as a hirer including carrying out insurance and DVLA checks checks

Legal grounds:

- To carry out our obligations arising from any hire and insurance contract entered into between you and us

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of carrying on insurance business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts

c) To evaluate your application for hire

Legal ground:

- such use is necessary in order to provide your insurance policy

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of providing hire and providing insurance as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

d) To provide and manage your insurance cover

Legal grounds:

- Our having an appropriate business need to use your information to provide insurance cover which does not overly prejudice you.

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of providing insurance cover as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

e) To provide and manage your claim (whether we are providing your insurers cover, or whether you are a third party making a claim against our pcover or a third party insurer for whom we act).

Legal grounds:

- Our having an appropriate business need to use your information to manage an insurance contract and claim which does not overly prejudice you.
- Our providing an insurance cover.

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of providing insurance cove as permitted by Data Protection Law, or, because you have provided

f) Communicating with you and resolving any complaints that you might have

Legal grounds:

- Our providing your campervan hire
- Our having an appropriate business need to use your information to manage and respond to complaints which does not overly prejudice you

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of carrying out a campervan hire business as permitted by Data Protection Law, or, because you have provided us with your explicit consent.

g) To transfer to third parties for the purpose of providing you with the services required under the insurance contract or other services which you have elected to receive from us in connection with the insurance contract.

Legal grounds:

- Our providing the insurance cover
- Our providing other contracted services

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of carrying out a campervan hire business as permitted by Data Protection Law, or, because you have provided us with your explicit consent..

h) To transfer to third parties where you have elected to enter into a contract with that third party for separate services.

Legal grounds:

- You have provided your explicit consent to allow us to provide the third party with your details to enable you to enter into a contract with that third party.

Additional legal ground for sensitive personal information:

- You have provided your explicit consent to the provision of these additional services which necessitate the transfer of sensitive personal information.

i) Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.

Legal grounds:

- Our providing your insurance cover and campervan hire
- Our having an appropriate business need to use your information to ensure fraud is detected which does not overly prejudice you

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of carrying out a campervan hire business as permitted by Data Protection Law, or, because you have provided us with your explicit consent..
- The use is necessary for reasons of substantial public interest in preventing or detecting unlawful acts

j) Complying with our legal or regulatory obligations

Legal grounds:

- The use is necessary in order for us to comply with our legal obligations

Additional legal ground for sensitive personal information:

- Either because the use of this information is necessary for the purpose of carrying out a campervan hire business as permitted by Data Protection Law, or, because you have provided us with your explicit consent..
- The use is necessary in order for us to establish, exercise or defend our legal rights

k) Recover outstanding payments

Legal grounds:

- Our having an appropriate business need to use your information in order to recover debts which does not overly prejudice you

Additional legal ground for sensitive personal information:

- The use is necessary in order for us to establish, exercise or defend our legal rights

l) To provide you, to provide you, with information about goods or services we feel may interest you, including news updates and details of special offers (further details are provided in the 'Marketing' section below)

Legal grounds:

- You have provided your explicit consent which can be withdrawn at any time.

m) To improve our customer service

Legal grounds:

- Our having an appropriate business need to use your information in the improvement of our customer service which does not overly prejudice you

<p>n) To measure the effectiveness of our advertising</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> • Our having an appropriate business need to use your information to ensure our advertising is effective which does not overly prejudice you
<p>o) To provide data analysis in order to assist us with the pricing of our products and detect market trends.</p> <p>Legal grounds:</p> <p>Our having an appropriate business need to use your information which does not overly prejudice you.</p>
<p>p) To personalise your repeat visits to our website and to improve our website, including as part of our efforts to keep our website safe and secure</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> • Our having an appropriate business need to use your information which does not overly prejudice you.
<p>q) To notify you about changes to our services or products</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> • Our having an appropriate business need to use your information to keep our customers up to date with changes to our products or services which does not overly prejudice you.
<p>r) To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> • Our having an appropriate business need to use your information to maintain our websites which does not overly prejudice you.
<p>s) To allow you to participate in interactive features of our services / website</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> • Our having an appropriate business need to use your information to offer an interactive website for customers which does not overly prejudice you.
<p>t) To transfer to third parties for the purpose of conducting internet analytics.</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> • Our having an appropriate business need to use your information to maintain our websites and undertake website analytics which does not overly prejudice you.
<p>u) For analytical purposes and to improve our products and services. Where possible, we will anonymise such information</p> <p>Legal grounds:</p> <ul style="list-style-type: none"> • we have a legitimate business need to use your personal information for services improvement

v) Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics

Legal grounds:

- **we have a legitimate business need to provide secure and quality services**

How long do we keep personal information for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our contractual, legal and regulatory obligations.

We have implemented a Document Retention Policy which records of details how long various types of information should be retained. The Policy is reviewed on a regular basis to ensure that it aligns to current legal and regulatory requirements. The retention periods vary depending upon the circumstances of an individual matter but in general our retention periods for customer facing documentation can be set out as follows

Quote Information	6 months (unless marketing consent received from you in which case 13 months)
Booking form and Hire Agreement	7 years from date of hire to cover any latent insurance claims
Insurance Claims Documents	7 years from date of last settlement /order (this period may be extended if the claim involves a minor or the accident resulted in catastrophic injuries)
Complaints	3 years from the complaint being resolved or the hire agreement retention period whichever is the longer

If you would like further information regarding the periods for which your personal information will be stored, please see the contact details outlined in the "access to your personal data" section below.

Your rights

Under data protection law you have certain rights in relation to the personal information that we hold about you. You may exercise these rights at any time by contacting us using the details set out in the " access to your personal data " section of this Privacy Policy.

Please note:

- In some cases we may not be able to comply with your request (e.g. we might not be able to delete your data) for reasons such as our own obligations to comply with contractual, legal or regulatory requirements.

However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

- In some circumstances exercising some of these rights (including the right to erasure, the right to restriction of processing) will mean we are unable to continue providing you with a hire and may therefore result in the cancellation of the hire. You will therefore lose the right to bring any claim or receive any benefit under the policy, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle an insurance claim has been prejudiced. Our terms and conditions set out what will happen in the event your hire being cancelled. For some hires no refunds will be payable on cancellation, for other a refund or partial refund may be payable.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and up to date. However, if you do not believe this is the case, you can ask us to update or amend it.

The right to erasure

In certain circumstances, you may ask us to erase your personal information.

The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal information.

The right to object to marketing

You can ask us to stop sending you marketing messages at any time.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

The right to lodge a complaint with the ICO

You have a right to complain to the Information Commissioner's Office (ICO) if you believe that any use of your personal information by us is in breach of applicable data protection laws and regulations.

More information can be found on the ICO's website at: www.ico.org.uk/concerns

Making a complaint will not affect any other legal rights or remedies that you have.

How we protect your information

We want you to have confidence in how we use and hold your data. We know that to achieve this we must preserve the security and confidentiality of your personal information. We have therefore developed a range of organisational, procedural and technical security

measures designed to protect your personal information from unauthorized use or disclosure. Examples of some of these measures include:

- User and privileged account management including appropriate policies for password complexity, length and history.
- Auditing of system users and administrators.
- Regular backup schedules and disaster recovery environment for key systems and services.
- Secure file transfer methods are used to encrypt data.
- Usage of data loss prevention tools.
- Data breach detection: regular reviews to detect unusual or abnormal activity.
- Data breach investigation: investigation of any potential or reported breaches.
- Data breach response: A plan that pulls together our compliance, legal and IT security teams to ensure rapid assessment and mitigation of data breaches

Access to your personal data

You are entitled to view, amend, or delete the personal information that we hold. Email your request to our data protection officer Tim (tim@dubdubandaway.com)

Other websites

Our website may contain links to other websites. This Privacy Policy only applies to our own website so when you link to other websites you should read their own privacy policies. If this policy conflicts with any written contract that we have with you then the written contract shall take precedence.

Finally

This policy was last updated on the 2nd May 2018 and we will review it on an annual basis and if we change our insurance provider.