

Aviva Data Protection – Privacy Notice

In this section, reference to “we”, “us”, “our” and “the insurer” means Aviva Insurance Limited.

Personal Information

The data controller responsible for this personal information is Aviva Insurance Limited as the insurer of the product. Additional controllers include:

- Santander UK plc and Santander Insurance Services UK Limited, collectively known as Santander who are responsible for the sale and distribution of the product;
- any applicable insurers, reinsurers and brokers we use.

The Insurer collects and uses personal information about you so that we can provide you with a policy that suits your insurance needs. This notice explains the most important aspects of how we use your information but you can get more information about the terms we use and view our full privacy policy at www.aviva.co.uk/privacypolicy or request a copy by writing to us at Aviva, Freepost, Mailing Exclusion Team, Unit 5, Wanlip Road Ind Est, Syston, Leicester, LE7 1PD.

Personal information we collect and how we use it

The Insurer will use personal information collected from you and obtained from other sources:

- to provide you with insurance: we need this to decide if we can offer insurance to you and if so on what terms and also to administer your policy, handle any claims and manage any renewal,
- to support legitimate interests that we have as a business. We need this to:
 - manage arrangements we have with our insurers, reinsurers and brokers we use, and for the detection and prevention of fraud,
 - help us better understand our customers and improve our customer engagement. This includes profiling and customer analytics which allows us to make certain predictions and assumptions about your interests, make correlations about our customers to improve our products and to suggest other products which may be relevant or of interest to customers,
- to meet any applicable legal or regulatory obligation: we need this to meet compliance requirements with our regulators (e.g. Financial Conduct Authority), to comply with law enforcement and to manage legal claims; and
- to carry out other activities that are in the public interest: for example, we may need to use personal information to carry out anti-money laundering checks.

We may also use personal information about other people, for example family members you wish to insure on a policy. **If you're providing information about another person we expect you to ensure that they know you're doing so. You might find it helpful to show them this privacy notice.**

The personal information we collect and use will include name, address and date of birth, financial information and details of your home. If a claim is made we'll also collect personal information about the claim from you and any relevant third parties. We may also need to ask for details relating to the health or any unspent offences or criminal convictions of you or somebody else covered under your policy. We recognise that information about health and offences or criminal convictions is particularly sensitive information. We'll ensure that we only use that information where we need to for our insurance purposes (including assessing the terms of your insurance contract, dealing with changes to your policy and/or dealing with claims).

There may be times when we need consent to use personal information for a specific reason. If this happens we'll make this clear to you at the time. If you give us consent to using personal information, you're free to withdraw this at any time by contacting us – refer to the 'Contacting us' details below. Please note that if consent to use this information is withdrawn we'll not be able to continue to process the information you gave us for this/these purpose(s). This would not affect our use of the information where consent is not required.

Of course, you don't have to provide us with any personal information, but if you don't provide the information we need we may not be able to proceed with your application or any claim you make.

Some of the information we use as part of this application may be provided to us by a member of the Aviva group or a third party. This may include information already held about you and your home within the Aviva group, including details from previous quotes and claims. It may also include information we obtain from Santander, publicly available records, our trusted third parties and from industry databases, including fraud prevention agencies and databases. We will also use a score provided to us by Santander to assess your insurance risk. For further information on how Santander calculate this score, see the 'Automated decision making' section below.

Credit Reference Agency Searches

To ensure the Insurer has the necessary facts to assess your insurance risk, verify your identity, help prevent fraud and provide you with our best premium and payment options, the insurer may need to obtain information relating to you at quotation, renewal and in certain circumstances where policy amendments are requested. The insurer or its agents may undertake checks against publicly available information (such as electoral roll, county court judgements, bankruptcy orders or repossession(s)). Similar checks may be made when assessing claims.

The identity of our Credit Reference Agency and the ways in which they use and share personal information, are explained in more detail at www.transunion.co.uk/crain

Automated decision making

We carry out automated decision making to decide whether we can provide insurance to you and on what terms. In particular, we use an automated underwriting engine to process the personal information you provide as part of this application process. This will include information such as your age, as well as details of your property including address and postcode. The automated engine may validate the information you provide against other records we hold about you in our systems and third-party databases, including public databases. We may also supplement the information you provide us with information from within the Aviva group and third parties who can provide more information about you (for example credit reference agencies) or your property (for example through land registers and commercially available property databases).

We also use a score calculated by Santander using your personal information, where such information is an indicator of insurance risk. In order to produce the score, Santander will use certain demographics, account holdings and account behaviours (such as Direct Debits you have set up on your Santander accounts) and details of transactions relevant to your accounts are analysed. Santander will only share the score with us and we will use it to calculate insurance risk and therefore how much the cover will cost you. Santander will not share any of the data which is used to calculate the score.

Using the information described above allows us to provide you with a price, that is a more accurate reflection of your individual circumstances. We regularly check the way our underwriting engine works to ensure we're being fair to our customers. After the automatic decision has been made, you have the right to speak to someone from Aviva who will review the decision and may provide a more detailed explanation. If you wish to invoke this right please contact us at dataprt@aviva.com or call us on **0345 030 7767**.

How we share your personal information with others

We may share your personal information:

- With the Aviva group, our agents and third parties who provide services to us, other insurers (either directly or via those acting for the insurer such as loss adjusters or investigators) and Santander to help us administer our products and services;
- With regulatory bodies and law enforcement bodies, including the police, e.g. if we're required to do so to comply with a relevant legal or regulatory obligation;
- With other organisations including insurers, public bodies and the police (either directly or using shared databases) for fraud prevention and detection purposes;
- With reinsurers who provide reinsurance services to Aviva and for each other in respect of risks underwritten by Aviva, with insurers who cover Aviva under its group insurance policies and with our brokers who arrange and manage such reinsurance and insurance arrangements. They will use your data to decide whether to provide reinsurance and insurance cover, arrange and manage such cover, assess and deal with reinsurance and insurance claims under such cover and to meet legal obligations. They will keep your data for the period necessary for these purposes and may need to disclose it to other companies within their group, their agents and third party service providers, law enforcement and regulatory bodies.

Some of the organisations we share information with may be located outside of the European Economic Area (EEA). We'll always take steps to ensure that any transfer of information outside of Europe is carefully managed to protect your privacy rights. For more information on this please see our Privacy Policy or contact us.

How long we keep your personal information for

We maintain a retention policy to ensure we only keep personal information for as long as we reasonably need it for the purposes explained in this notice. We need to keep information for the period necessary to administer your insurance and deal with claims and queries on your policy. We may also need to keep information after our relationship with you has ended, for example to ensure we have an accurate record in the event of any complaints or challenges, carry out relevant fraud checks, or where we're required to do so for legal, regulatory or tax purposes.

Your rights

You have various rights in relation to your personal information, including the right to request access to your personal information, correct any mistakes on our records, erase or restrict records where they are no longer required, object to use of personal information based on legitimate business interests, ask not to be subject to automated decision making if the decision produces legal or other significant effects on you, and data portability. For more details in relation to your rights, including how to exercise them, please see our full privacy policy or contact us using the details below.

Contacting us

If you have any questions about how we use personal information, or if you want to exercise your rights stated above, please contact our Data Protection Officer by either emailing them at dataprt@aviva.com or writing to the Data Protection Officer, Level 5 Pitheavlis, Perth, PH2 0NH.

If you have a complaint or concern about how we use your personal information, please contact us in the first instance and we'll attempt to resolve the issue as soon as possible. You also have the right to lodge a complaint with the Information Commissioner's Office at any time.

Insurance is administered and underwritten by Aviva Insurance Limited. Registered in Scotland, No. 2116. Registered Office: Pitheavlis, Perth, PH2 0NH. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.
Santander UK plc. Registered Office: 2 Triton Square, Regent's Place, London, NW1 3AN, United Kingdom. Registered Number 2294747. Registered in England and Wales. www.santander.co.uk. Telephone 0800 389 7000. Calls may be recorded or monitored. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Our Financial Services Register number is 106054. You can check this on the Financial Services Register by visiting the FCA's website www.fca.org.uk/register. Santander and the flame logo are registered trademarks.