

# Privacy Notice

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# Introduction

## Your personal data: how we collect, use, and protect it. (Our 'Privacy Notice')

It is very important to us that all our customers trust us to handle their personal data responsibly. We have written this document to explain clearly how we collect, use and protect your personal data. In particular, it explains things like:

- why we need your personal data for certain things
- how we share your personal data with others
- your rights under data protection laws

## What the law says about handling personal data

The personal data protection laws control how we use your personal data, for example, we must be transparent about how we collect and use your personal data. They also grant you rights, such as the right to access the personal data that we hold about you (see section 'Your Rights').

## Who we are referring to when we say 'we', 'us', and 'our' in this Privacy Notice

When you take out a Tesco Bank Box Insurance policy, Tesco Personal Finance (trading as Tesco Bank) acts as an intermediary for this policy. The insurance policy is arranged and administered by Insure The Box Limited (Insure The Box).

We also offer additional products provided by

- RAC Motoring Services and/or RAC Insurance Limited
- Keycare Limited

Where you take out any of these additional products, your data will be shared with them.

This document explains how all these parties use your personal data.

- In The Tesco Bank Privacy Notice, "we", "us" and "our" refers to Tesco Bank unless otherwise stated.
- In the Insure The Box Privacy Notice " we", "us" and "our" refers to refers to Insure The Box Limited unless otherwise stated.

If you purchase additional products, your personal data will be shared with the relevant provider.

- In the Tesco Bank Breakdown Cover section " we", "us" and "our" refers to refers to RAC Motoring Services and/or RAC Insurance Limited unless otherwise stated.
- In the Tesco Bank Key Cover section " we", "us" and "our" refers to refers to Keycare Limited unless otherwise stated.

For the purposes of the personal data protection laws, we are separately responsible for the personal data we process about you.

## Who this document applies to when we talk about 'you'

This Privacy Notice applies to everyone covered under your policy. It also applies to anyone you have nominated to act on your behalf, and anyone who pays your premium. Please make sure that they have seen this notice, and that you have their permission before giving us any personal data about them.

# Tesco Bank Privacy Notice

## What sort of data does Tesco Bank hold about you?

### What the law says about processing

The law requires us to tell you how we process your personal data. "Processing" is a legal term but means anything we do with your personal data, such as collecting, gathering, obtaining, administering, adapting, keeping and deleting your personal data.

### We collect and keep data about you

This includes the personal data you give via our website or over the phone when you apply, request a quotation and throughout your time as a Tesco Bank customer). It also includes personal data you give us any time you write to us or contact us electronically.

### We may also gather other data about you

We may also obtain and combine data about you from other places, such as the wider Tesco Group and publicly available resources, such as the electoral register and the internet.

We do this so we can make sure the personal data we hold about you is accurate, to perform checks, and make you offers.

### We will keep and use personal data about other people connected to your products

We'll only do this if we need this information to service your policy, for example if you make a complaint.

### More information about the times we collect personal data about you

**When you call us** we monitor and record calls to and from our customer service centres to improve our service and to prevent and detect fraud.

**When you contact us electronically** (e.g. by email or Internet), we may collect an electronic identifier, such as your internet protocol address.

**When you visit our website** when you browse our website, we collect data about your browsing habits using cookies. For more information about how we use cookies, please see our cookies policy at [www.tescobank.com/help/privacy-and-cookies](http://www.tescobank.com/help/privacy-and-cookies)

### We will only ask for necessary personal data unless we tell you otherwise

We will ask for personal data that is essential for us to know so that we can provide our products or services to you. If we ask for personal data that is not essential, we will explain why and tell you the consequences if you do not provide us with the personal data.

## What about sharing someone else's data?

### You must have permission to share someone else's personal data with us

If you want to give us details about other people who are covered by insurance, you must make sure you have shared the relevant information from this notice with them. You must also make sure you have their permission before you:

- give us any personal data about them
- make decisions on their behalf about how we keep and use their personal data

## How does Tesco Bank use your personal data?

### Necessary uses – providing our products and services

To provide our services to you we will need to use your personal data.

We will need to use this personal data at all stages of our relationship with you, including:

- when you request a quotation
- when you take out a product or service or require to use a service
- during the time we have a relationship with you
- and for a period of time afterwards

The way we use the personal data about you includes:

- in order to match you with a clubcard (for more information see ‘How Tesco Bank and Clubcard work together’ )
- to provide tailored marketing to you ( for more information see ‘Will Tesco Bank send me marketing information?’)
- To deal with complaints

### It is necessary that we are able to use your personal data in this way

We can only provide these services if we can use your personal data in this way.

The law says we must ask for certain mandatory information, and make certain checks.

Also, if you want to apply for our products or services, you must provide us with mandatory information.

### We also use your personal data for other ‘legitimate business interests’

These are other uses allowed by law which are necessary to enable us to provide the products and services. These include:

- detecting and preventing fraud, other forms of financial crime, and other unlawful acts
- managing and operating our business
- improving our business (see below)

### We may use your personal data to improve our business

The law allows us to use your personal data in reasonable ways to help us improve our business.

The ways we might use your personal data to improve our business are to:

- understand customers’ needs and requirements
- develop and test products and services
- carry out research and analysis on our products and services

When we use your personal data to improve our business, we always make sure we keep the amount of data we collect and use to an absolute minimum.

## Will Tesco Bank send me marketing information?

### We may use your personal data to tailor marketing to you

We do this so we can tell you about things we think you would like to know about.

We may send marketing by post, telephone, text, email and other electronic means.

We may also provide tailored marketing to you in other places, such as at the tills when you shop at Tesco.

We will only ever send you information about things we think are relevant to you.

Some tailored marketing needs your agreement before we can send it to you; we will ensure we have this agreement.

### Learning more about you and tailoring things for you

#### Using your personal data to help us understand more about you

We may look at your Clubcard data in different ways; to help us understand more about you and people like you.

We call this 'profiling'. See the 'How Tesco Bank and Clubcard work together' section for more information.

When you take part in competitions, surveys or promotions we will collect and keep information such as your answers, feedback and contributions to questionnaires.

#### We may combine different sources of data we know about you

We may have data about you from several different sources – for example, from your Tesco Bank account, your Tesco Clubcard, and your visits to Tesco Group websites.

The personal data we get from your account can include data about your transactions and how you manage your account.

The personal data we get from your Tesco Clubcard can include data about your shopping habits and the types of things you buy.

The personal data we get from your visits to Tesco Group websites may include data you have given us when requesting a quote, even if you didn't go on to take out a product with us.

#### We may sometimes get data from other external sources

For example, we may get personal data about you from third parties about when policies are due for renewal. This will only occur where third parties have ensured that passing your personal data to us is permitted by the data protection laws.

#### We may combine data from different sources together to tailor marketing information for you

We will only send you information about things we think are relevant to you.

#### We may also use your personal data to tailor online adverts to you

We will sometimes use your personal data to tailor the adverts you see when you are online.

These might be on Tesco Group websites, social media sites, or other sites that sell advertising space.

Personalised adverts show the **AdChoices** logo: Click the logo to learn more about how online ads are made relevant to you.

Websites where you have an 'account' – such as Gmail or Facebook – will also have their own pages which explain their own information policies.

#### We may use personal data we know about you to offer you tailored products

We may use personal data we know about you to offer you products we think you might like.

When we do this, we might use data about how you manage your account or policy, including your credit history.

We might also combine this with data we know about you from your Tesco Clubcard.

Pre-approved offers are based on information we already know about you. When we make you a pre-approved offer, we do not do external credit checks.

We will only ever use your personal data in this way so that we can offer you better deals than you would get if we didn't use that information.

## Opting out

You can opt out of us using your personal data for marketing at any time

We consider that our marketing and profiling activities can be to our mutual benefit-as it helps us to ensure that we only tell you about products and services that we believe will be of interest to you. It is in our legitimate interests to ensure we carry out marketing in the most effective way, although we will always ensure that we carry out any direct marketing in line with your marketing preferences. Plus, there will always be an option for you to opt out or say no to us using your personal data for marketing during any application process for our products or services.

To opt out, just let us know in one of these ways

**On emails:** by clicking 'opt out' or 'unsubscribe' (usually at the bottom of the email).

**By phone:** by calling us on **0345 293 9475**. (All our numbers are listed at **[www.tescobank.com](http://www.tescobank.com)**).

## How Tesco Bank and Clubcard work together

### We use Tesco Bank and Clubcard data together to bring you better offers

Clubcard data includes your shopping habits and the types of purchases you or your household make.

We use Tesco Bank and Clubcard data together in different ways to tailor our communications and to try to bring you better terms, deals or offers than you would get if we didn't use the information.

### We try and match you with Clubcards at your address

We use data that you provide, such as your name and address, to find any Clubcard(s) that are linked to your address. That might be your Clubcard, the Clubcard of other family member(s), or the Clubcard of house or flat-mates.

We may use data about these Clubcard(s) to help us work out what offers we think you might like. When we do this, we will only ever use the Clubcard linked to your address which gives you the best terms, deals or offers.

### We use your Clubcard data to help us work out whether we can offer you certain products, and what discounts, deals or offers we can make you

We do this by looking at your Clubcard data in different ways to help us understand more about you (we call this 'profiling'). Profiling includes things such as how likely we think you are to pay back money we lend you, how often you use other Tesco products and services, and how you prefer to shop. Profiling helps us to create a number of 'Clubcard scores', which we can then use as one of the factors in our automated decision-making process.

Because Clubcard profiling allows us to tailor offers specifically for you, this means that different Clubcard customers may get different offers. However, Clubcard customers will always receive better offers than non Clubcard customers.

### We may calculate a new 'Clubcard score' for you when your policy changes

We may calculate a new 'Clubcard score' when we give you a quote, or offer you a renewal. We do this so we can make you, as a Clubcard customer, better and/or more tailored offers.

### How to get more details about how we monitor our automated decision-making

You have rights relating to automated decision-making.

Information can be found at [www.tescobank.com/help/contact-us](http://www.tescobank.com/help/contact-us)

### Ongoing use of your Clubcard data

If you take a product or service from us, we will continue to use your Clubcard data to help us maintain our relationship with you.

## Who do Tesco Bank share your personal data with?

### Why we share your personal data

In order to provide our products and services to you, it is necessary for us to share information with third parties. For some third parties we need to share your personal data because they provide a service which we do not provide (such as the Insurers or the Add-on Providers). For other third parties, we are required to share your personal data to prevent fraud and other forms of financial crime, to ensure that we are lending responsibly or to ensure that we are meeting our regulatory requirements.

### Tesco Bank will only share your personal data

- where we have your permission
- where the law says we must
- where sharing the personal data meets the requirements of the data protection laws

Whenever we share data, we only share the amount necessary to achieve the objective of the sharing.

### Tesco Bank will only share your personal data with these people:

- with anyone you nominate to act on your behalf
- with regulatory bodies and authorities
- with other companies, (if we are, or are considering, transferring the rights and obligations we have with you)
- with another insurer, if we have invited you to renew your insurance with them
- with Tesco Group and Tesco stores, in connection with your Clubcard (for example, to allocate discounts, or where you have agreed to receive marketing)
- with other Tesco Group companies. [www.tescopl.com/about-us/](http://www.tescopl.com/about-us/)
- with our market research agency to contact you with relevant surveys

## How does Tesco Bank handle sensitive personal data?

### When we need to use sensitive personal data

Sometimes we will need to ask you for sensitive personal data. For example, when dealing with an insurance policy, you might need to tell us about a medical condition. If required, to comply with data protection laws, we will ask for your explicit consent to use this data (data protection laws call this 'special category data' or 'sensitive personal data').

### How we handle data about special circumstances

We handle data about any special circumstances as carefully and confidentially as any other data we hold about you. This includes data about things you tell us so that we are able to provide you with additional assistance (e.g. if you are hard of hearing) and also information that laws or regulations say we must record (for example, if any underlying medical condition has led to you appointing a Power of Attorney).

## How does Tesco Bank use your personal data to contact you?

### We will contact you in a variety of different ways

We may contact you by phone/post/email and SMS. If you have given us an email address or mobile number, we might also use these to contact you with servicing messages about your policy and for ongoing policy management.

### We keep confidential data to a minimum via email and text

This is because emails and texts are less secure. (You should never send us any confidential data via email or text).

## Sending your personal data to other countries

### We will only send your personal data outside the EEA if we know it will be well protected

Sometimes we might send your personal data to another country if, for example, our service provider has a data centre overseas.

All countries within the EEA have broadly the same data protection laws. Before sending your personal data outside the EEA, we check that the recipient will be able to keep your personal data secure and that:

- the EU Commission confirms that the recipient is established in a country which offers essentially equivalent protection to that provided within the EEA; or
- it is to a private US company that has self-certified with the Privacy Shield

If neither of these apply, then we ask the recipient to sign the EU Commission's 'model contract'. This means they must meet EU standards of data protection.

When your personal data is in another country, it may be accessed by law enforcement agencies in those countries. They do this to detect and prevent crime, or because the law says they must.

For more information about sending your personal data overseas, you can write to: The Data Protection Officer, Tesco Bank, PO BOX 27009, Glasgow, G2 9EZ

## How long does Tesco Bank keep your personal data for?

### We keep your personal data for a reasonable period only

How long we keep your personal data will depend on:

- what type of product or service we are providing for you
- how long laws or regulations say we must
- what we need for fraud and other financial crime prevention
- what we need to lend responsibly
- other legitimate business reasons (for example because we need to respond to a complaint or legal claim)

## How long do we keep data when you no longer use our services?

We keep your personal data once your insurance for 7 years after your policies have lapsed.

In some cases, your insurer may be required to store personal data relating to claims for longer. During this period, this data will only be accessed and shared with us in exceptional circumstances.

## When you have applied but not taken out a product

We keep insurance quote data for up to 15 months. We do this to help us understand more about you, to help develop our products and services, and to protect you and us against fraud and other forms of financial crime. We may also use this information if you apply for a product again in the future.

## For marketing purposes

We keep your personal data for 3 years after your last activity with us.

In all cases, we will retain the personal data for so long as that personal data is needed for an ongoing investigation, legal proceedings, insurance claim or an outstanding audit.

## What happens if Tesco Bank changes how we use your personal data?

We will contact you if there are any important changes to how we use your personal data

If we think it's a change you would not expect, we will let you know.

## Some changes might need your consent, or need you to opt out

If this is the case, we will always wait until you have let us know your decision before making any changes to the way that we use your personal data.

## Your rights

### You have the right to know what data we hold about you

This is called your 'subject access rights'.

The law says that you are entitled to see what data we hold about you.

If you ask us for this, we will give you access or send you a copy of all the personal data we hold about you. (There are a few exceptions to this, such as access to personal data about third parties).

If you want a copy of your personal data, please use the 'subject access' form

You can find the form on our Privacy Notice page at: [www.tescobank.com/help/privacy-and-cookies](http://www.tescobank.com/help/privacy-and-cookies)

We will respond to your request within one month.

We may get in touch sooner if we need extra information to help us find your personal data, or to verify your identity.

**You have the right to have the personal data you have provided to us supplied to you in an easily transferable digital format.**

This is known as the 'right to data portability'.

This means you can ask us to send your personal data in this format to you, or to another organisation (for example, another bank or insurer).

**You have the right to change or amend your personal data**

If you think any of the personal data we hold about you is incorrect or incomplete, let us know and we will change it.

**You have the right to stop us using, restrict us using, or request that we erase the personal data we hold about you**

If you want us to stop using, or restrict our use of, your personal data, or you want us to erase it entirely, please let us know. There are times when we may not be able to do this – for example, if the information is related to an existing or recently expired contract between you and us, or if the law says we need to keep your personal data for a certain amount of time.

**You have the right to withdraw your consent at any time**

Sometimes we need your consent to process your personal data. If you have given consent, you can change your mind and withdraw it. To do this, get in touch by using the relevant contact details from our website.

However, we do not always need your consent to use your personal data. There is some information this doesn't apply to. For instance;

- the information we need in order to provide your product or service
- the information that it's necessary we have in order to run our business or to provide the products or services in a more effective way (known as the "legitimate interests" condition), or
- the information the law says we must collect and use

**Contact us for more information about how we handle your personal data**

If you have concerns about how we handle your personal data, or just want more details, please call us (see contact us section on our website) or write to the address below. We will try and sort things out as quickly as we can. **Our address is:** The Data Protection Officer, Tesco Bank, PO BOX 27009, Glasgow, G2 9EZ

**For more data about your rights, visit the Information Commissioner's Office website**

The Information Commissioner's Office is the UK's independent authority set up to uphold information rights, and promote data privacy for individuals. Their website is [www.ico.org.uk](http://www.ico.org.uk).

If you have a complaint or concern about how we have handled your personal data and we have not been able to sort it out to your satisfaction, you have the right to lodge a complaint with the ICO.

# Insure the Box Privacy Notice

Your privacy is very important to us. We promise to respect and protect your personal information and try to make sure that your details are accurate and kept up to date. This Privacy Policy sets out details of the information that we may collect about you and how we may use that information. Please take your time to read this Privacy Policy carefully. When using our websites, this Privacy Policy should be read alongside the website terms and conditions.

## 1. About Insure The Box Limited

In this Privacy Policy references to "we" or "us" refer to Insure The Box Limited. We are part of the MS&AD Insurance Group of companies. You can find out more about the group at [www.ms-ad-hd.com/en](http://www.ms-ad-hd.com/en). We will share data within the group, but this is limited to Group Companies within the European Economic Area (EEA), except in exceptional circumstances where we may need to discuss a policy or claim with our parent companies.

In order to provide our services, we will collect and use data about individuals. This means that we are a 'data controller' and we are responsible for complying with data protection laws. We have appointed a data protection officer to oversee our handling of personal information. If you would like more information about how we collect, store or use your personal information, see the "Contact us ►" section below.

## 2. What do we mean by personal information?

"Personal Information" means information that relates to you as an individual, whether linked to your name or any other way which you could be identified, such as your driving licence number or your insurance policy number.

Certain types of personal information are considered to be "special categories of information" due to their more sensitive nature. Sometimes we will ask for or obtain special categories of information because it is relevant to your insurance policy or claim. For example, to assess risk appropriately, we will ask our customers about previous motoring convictions. This Privacy Policy highlights where we are likely to obtain special categories of information, and the grounds on which we process this data. We will only process special categories of information where they are relevant and will never process certain types e.g. details of your sex life.

**Special categories of information:** Information about your health, criminal convictions, genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.

## 3. Our processing of your personal information

The personal information that we collect will depend on our relationship with you. For example, we will collect more detailed information about you if you have become a customer than if you simply ask for a quote. We have included a number of sections below – simply read those which most apply to your relationship with us.

**If you provide personal information to us about other people you must provide them with a copy of this Privacy Policy, and obtain relevant consent from them where we have indicated in this Privacy Policy that we need it.**

### 3.1 If you have (or someone on your behalf has) taken out a quote through us

*(This section shows what personal information we collect about you and use if you are either: a prospective customer and have submitted your personal information so that we can provide you with an insurance quote; or are somebody named on a quotation.)*

#### **What personal information will we collect and where will we collect it from?**

We collect the following information provided by you (or anyone applying for a policy on your behalf) by phone or web:

- **Individual details:** Your name, address, contact details (e.g. email / telephone), gender, marital status, date of birth, nationality
- **Employment Information:** Your job title and the nature of the industry you work in
- **Identification details:** Your driving licence number
- **Previous and current claims:** Any previous insurance policies you have held and claims made against those policies
- **Other Risk Details:** Details about the car to be insured, along with the following **special categories of information** relating to each driver:
  - **Health Data:** Physical or mental health factors relevant to the insurance application, e.g. DVLA Notifiable conditions
  - **Criminal convictions** which are unspent under the Rehabilitation of Offenders Act. This includes both motoring and non-motoring offences / alleged offences which you have committed, or any court sentences which you are subject to
- **Marketing Preferences:** where relevant, including whether you have requested not to receive marketing information
- **Website Usage, including Cookies and use of our Live Chat Facility:** See section 3.6 below
- **Other information:** that we capture during recordings of our telephone calls, or if you make a complaint. This may include **special categories of information** you volunteer when communicating with us (we will not further process these without your explicit consent)

We use external sources to supplement and verify information the information above, and also to provide the following new information:

- **Credit and Anti-Fraud Data:** Credit history, credit score, sanctions and criminal offences, bankruptcy orders, individual voluntary arrangements (IVAs) or county court judgements, and information received from various anti-fraud databases. Some of this information (e.g. criminal offences) may include **special categories of information** relating to you
- **Demographic data:** Lifestyle indicators such as income, education, and size of your household
- **Open Source Data:** unstructured data which is in the public domain
- **Clubcard Data:** See the Tesco Bank privacy notice for information about how your Clubcard data is used

The external sources that provide us with information about you include:

- The policy applicant (where you are an individual named under a quote) or anyone authorised to act on your or their behalf
- Other MS&AD Insurance Group companies
- Other third parties involved in the insurance application process (such as the price comparison website used, Tesco Bank, or other insurers).
- Credit reference agencies
- Providers of demographic data and vehicle data
- Financial crime detection agencies and insurance industry financial crime databases (such as for fraud prevention and checking against international sanctions) including the Claims and Underwriting Exchange (known as "CUE") and CIFAS
- Insurance industry bodies and databases (including the Motor Insurance Database, the "MID")
- Government agencies and bodies such as the DVLA or regulators (e.g. Financial Conduct Authority)
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles)

**What will we use your personal information for?**

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose, and we will rely on the following grounds:

- We need your personal information because it is necessary *to enter into or perform a contract* (e.g. you request a quote with a view to entering into an insurance contract)
- We have a *genuine business need* to use your personal information (e.g. to keep a record of the decisions we make when different types of applications are made, keep business records, carry out strategic business analysis, review our business planning and/or develop and improve our products and services). When using your personal information in this way, we will always consider your rights and interests
- We have a *legal or regulatory obligation* to use your personal information (e.g. to meet record-keeping requirements of our regulators)

For **special categories of information**, we must have an additional “legal ground” for processing. We will rely on the following:

- It is in the substantial public interest and it is necessary: i) *for an insurance purpose* (e.g. assessing your insurance application and managing claims; or ii) *to prevent and detect an unlawful act* (e.g. fraud)
- *To establish, exercise or defend legal rights* (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves)

See the table below. Where we’ve used the symbol  this refers to the proposed policy applicant.  refers to any named driver on the quote:

Type of Processing	Grounds for using personal information	Grounds for special categories
To assess your insurance application and provide a quote (or a quote in which you are named)	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> <li> We have a genuine business need (to assess the insurance application and provide a quote)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for an insurance purpose</li> </ul>
To carry out fraud, credit and anti-money laundering checks (or a quote in which you are named)	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> <li> We have a genuine business need (to carry out appropriate fraud / credit checks)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for an insurance purpose</li> <li>• It is in the substantial public interest to prevent or detect unlawful acts (where we suspect fraud)</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To communicate with you and resolve any complaints that you might have	<ul style="list-style-type: none"> <li>• To enter into or perform a contract</li> <li>• We have a genuine business need (to send you communications, record and handle complaints)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for an insurance purpose</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"> <li>• We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for an insurance purpose</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To ensure that we consider any customers who may be in a vulnerable circumstance	<ul style="list-style-type: none"> <li>• We have a genuine business need (to ensure a consistent service to all of our customers and that all customers are treated equally)</li> </ul>	<ul style="list-style-type: none"> <li>• It is necessary for an insurance purpose</li> </ul>
To provide improved quality, training and security (e.g. through recorded or monitored phone calls to / from us, or customer satisfaction surveys)	<ul style="list-style-type: none"> <li>• We have a genuine business need (to develop and improve our products and services)</li> </ul>	We will not process your special categories of information for this purpose
Managing our business operations (e.g. keeping accounting records, analysing financial results, meeting audit requirements, receiving professional advice, and holding our own insurance)	<ul style="list-style-type: none"> <li>• We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business)</li> </ul>	We will not process your special categories of information for this purpose
For insurance administration purposes including trend analysis, actuarial work, pricing analysis, analysis of customer experience, planning service delivery, risk assessment and costs and charges	<ul style="list-style-type: none"> <li>• We have a genuine business need (to develop and improve our products and services)</li> </ul>	We will not process your special categories of information for this purpose

### **Who will we share your personal information with?**

On occasion, we will share personal information within the MS&AD Insurance Group or with the following third parties for the above purposes:

- The policy applicant (where you are an individual named in a quote), or anyone authorised to act on your or their behalf
- Credit reference agencies
- Providers of demographic data and vehicle data
- Financial crime detection agencies and insurance industry financial crime databases (such as for fraud prevention and checking against international sanctions) including the Claims and Underwriting Exchange (known as "CUE"), and CIFAS
- Insurance industry bodies and databases (including the Motor Insurance Database, the "MID")
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or regulators (e.g. Financial Conduct Authority)
- Other third parties involved in the insurance application process (such as the price comparison website used, Tesco Bank or other insurers)
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, subcontractors, and any outsourced service centre providers
- The police and other crime prevention and detection agencies
- Selected third parties in connection with any sale, transfer or disposal of our business

**If you would like more information about any of the above uses of your personal information, see the "Contact us ►" section below.**

## **3.2 If you hold (or are covered under) an insurance policy through us**

*This section shows what personal information we collect about you and use if you are a customer, or are covered by an insurance policy through us)*

### **What personal information will we collect and where will we collect it from?**

**In addition to the information provided to us by you (or on your behalf) in section 3.1 above**, we will obtain information about you during the lifetime of your policy, and if you claim against your insurance. This information includes:

- **Financial Information:** Bank and payment information
- **Telematics Information:** The telematics Black Box fitted to the insured car collects a wide range of driving data such as:
  - **Date/Time:** This helps us to understand at what time of day the car is driven
  - **Locational Data:** This helps us to understand which roads the car is driven on, and supports the Theft Tracking service
  - **Speed, Acceleration, and Braking Data:** This helps us to understand how smooth the driving style is
  - **Accident Detection:** This helps us to operate the Accident Alert service and to understand the circumstances relating to any accident

*Note: The telematics data obtained will relate to the car, not necessarily just to the policyholder. It is not possible to determine an individual driver at any point in time. If a policy ends, or is cancelled, the Black Box is remotely deactivated and will stop recording data.*

- **Additional Identification Details:** This may include items to verify your identity, residency, marital status, address, driving licence details and details of your car. All of this information will be obtained from you, but can contain **special categories of information** (e.g. a driving licence may show details of any motoring convictions)
- **Claims Information:** In relation to any incident or alleged incident involving the insured car. This includes **special categories of information** you volunteer when communicating with us about your claim (We will only process such information to the extent necessary in connection with your claim or where in connection with legal proceedings. All further processing will only be with your explicit consent)

We use external sources to supplement and verify information the information above, and also to provide the following new information:

- **Credit and Anti-Fraud Data:** Credit history, credit score, sanctions and criminal offences, bankruptcy orders, individual voluntary arrangements (IVAs) or county court judgements, and information received from various anti-fraud databases Some of this information (e.g. criminal offences) may include **special categories of information** relating to you
- **Demographic data:** Lifestyle indicators such as income, education, and size of your household
- **Open Source Data:** unstructured data which is in the public domain, including social media, about you, or the circumstances of any accident
- **Photo or Video Data:** including photos taken of the car at the point that the Black Box is installed; or footage recorded relating to a claim (including accident circumstances and interviews)
- **Claims Assessment Reports:** by engineers, medical experts, claims investigators, and in limited circumstances, private investigators. Some assessment reports may include **special categories of information** relating to you
- **Clubcard Data:** See the Tesco Bank privacy notice for information about how your Clubcard data is used

The external sources that provide us with information about you include:

- The named policyholder (where you are an individual covered or named under an insurance policy)
- Other MS&AD Insurance Group companies
- Other third parties involved in your insurance policy (such as the price comparison website used, Tesco Bank or providers of optional extra insurance)
- Third party suppliers we appoint to help us to carry out:
  - fitting of Black Boxes on our behalf; and
  - our everyday business activities including IT suppliers, actuaries, auditors, lawyers, debt collection agencies, document management providers, outsourced business process management providers, our subcontractors and tax advisors
- In the event of a claim:
  - other parties involved in a claim, including passengers, witnesses, any third-party claimants, or their insurer
  - third party suppliers we appoint to help us provide a service in relation to a claim (such as external claims handlers, our accident repair network, medical experts, claims investigators and private investigators).
- Credit reference agencies
- Providers of demographic data and vehicle data
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE") and CIFAS
- Insurance industry bodies and databases (including the Motor Insurance Database, the "MID")
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or regulators (e.g. Financial Conduct Authority)
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media)
- The police, HMRC and other crime prevention and detection agencies

#### **What will we use your personal information for?**

We may process your personal information for a number of purposes. For each purpose, we will rely on one or more of the following legal grounds:

- We need your personal information because it is necessary *to enter into or perform a contract* (e.g. the insurance contract)
- We have a *genuine business need* to use your personal information (e.g. to keep a record of the decisions we make when different types of applications are made, keep business records, carry out strategic business analysis, review our business planning and develop and improve our products and services). When using your personal information in this way, we will always consider your rights and interests
- We have a *legal or regulatory obligation* to use your personal information (e.g. to meet record-keeping requirements of our regulators)

For **special categories of information**, we must have an additional "legal ground" for processing. We will rely on the following:

- It is in the substantial public interest and it is necessary: i) *for an insurance purpose* (e.g. assessing your insurance application and managing claims; or ii) to prevent and detect an unlawful act (e.g. fraud)
- *To establish, exercise or defend legal rights* (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves)

See the table below. Where we've used the symbol  this refers to the proposed policy applicant.  refers to any named driver on the quote:

Type of Processing	Grounds for using personal information	Grounds for special categories
To carry out fraud, credit and anti-money laundering checks	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> <li> We have a genuine business need (<i>to carry out appropriate credit / fraud checks</i>)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> <li>It is in the substantial public interest to prevent or detect unlawful acts (<i>where we suspect fraud</i>)</li> <li>To establish, exercise or defend legal rights</li> </ul>
To set up your insurance policy (or a policy you are covered on)	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> <li> We have a genuine business need (<i>to set up and validate insurance policies</i>)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> </ul>
To manage and service and answer queries about your insurance policy (or a policy you are covered on)	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> <li> We have a genuine business need (<i>to manage and service insurance policies</i>)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> </ul>
To manage any claims you make under your insurance policy (or a policy you are covered on)	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> <li> We have a genuine business need (<i>to pay claims and manage the claims process</i>)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> <li>To establish, exercise or defend legal rights</li> </ul>
Using telematics data to monitor driving practices	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> <li> We have a genuine business need (<i>to monitor the driving style of drivers insured by us</i>)</li> </ul>	We will not process your special categories of information for this purpose
Using telematics data to provide theft tracking services	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> </ul>	We will not process your special categories of information for this purpose
Using telematics data to make decisions around renewals and campaigns	<ul style="list-style-type: none"> <li> To enter into or perform a contract</li> </ul>	We will not process your special categories of information for this purpose
Using telematics data to encourage safe driving through incentive schemes e.g. Bonus Miles	<ul style="list-style-type: none"> <li>We have a genuine business need (<i>to encourage safe driving practices</i>)</li> </ul>	We will not process your special categories of information for this purpose
To prevent and investigate fraud on an ongoing basis	<ul style="list-style-type: none"> <li>To enter into or perform your insurance contract</li> <li>We have a genuine business need (<i>to prevent and detect fraud and other financial crime</i>)</li> </ul>	<ul style="list-style-type: none"> <li>It is in the substantial public interest to prevent or detect unlawful acts (<i>where we suspect fraud</i>)</li> <li>To establish, exercise or defend legal rights</li> </ul>
To assist in renewal pricing	<ul style="list-style-type: none"> <li>To enter into or perform a contract</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> </ul>
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"> <li>We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> <li>To establish, exercise or defend legal rights</li> </ul>
To ensure that we consider any customers who may be in a vulnerable circumstance	<ul style="list-style-type: none"> <li>We have a genuine business need (<i>to ensure a consistent service to all of our customers and that all customers are treated equally</i>)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> </ul>
To communicate with you and resolve any complaints that you might have	<ul style="list-style-type: none"> <li>To enter into or perform a contract</li> <li>We have a genuine business need (<i>to send you communications, record and handle complaints</i>)</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for an insurance purpose</li> <li>To establish, exercise or defend legal rights</li> </ul>
To provide improved quality, training and security (e.g. through recorded or monitored phone calls to / from us, or customer satisfaction surveys)	We have a genuine business need (to develop and improve our products and services)	We will not process your special categories of information for this purpose
For debt collection purposes	To enter into or perform a contract	We will not process your special categories of information for this purpose
Managing our business operations (e.g. keeping accounting records, analysing financial results, meeting audit requirements, receiving professional advice, and holding our own insurance)	We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business)	We will not process your special categories of information for this purpose
For insurance administration purposes including trend analysis, actuarial work, pricing analysis, analysis of customer experience, planning service delivery, risk assessment and costs and charges	We have a genuine business need (to develop and improve our products and services)	We will not process your special categories of information for this purpose

### **Who will we share your personal information with?**

On occasion, we will share personal information within the MS&AD Insurance Group or with the following third parties for the above purposes:

- The policyholder (where you are an individual named on an insurance policy), or anyone authorised to act on their behalf
- Providers who may need your information in order to provide a service to you, including our Black Box fitting provider
- Our premium finance provider (for instalment customers)
- Insurers who support our products (e.g. our motor legal protection provider / providers of any optional extras purchased alongside your policy)
- Providers of claims services (such as external claims handlers, our accident repair network, medical experts, claims investigators and private investigators)
- The price comparison site used and Tesco Bank
- Third party suppliers we appoint to help us to carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, debt collection agencies, document management providers, outsourced business process management providers, our subcontractors and tax advisors
- Credit reference agencies/debt collection agencies
- Providers of demographic data and vehicle data
- Financial crime detection agencies and insurance industry financial crime databases (such as for fraud prevention and checking against international sanctions) including the Claims and Underwriting Exchange (known as "CUE"), and CIFAS
- Insurance industry bodies and databases (including the Motor Insurance Database, the "MID")
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or professional regulators (e.g. the Financial Conduct Authority in the UK)
- The police and other crime prevention and detection agencies
- Our reinsurers
- Selected third parties in connection with any sale, transfer or disposal of our business

**Sharing of Telematics Data:** Once we have installed and activated the Black Box in your car, it will record and provide us with data about the driving style of all drivers of the car. It will collect a wide range of driving data such as date, time, location, speed, acceleration and braking. The Black Box also allows us to operate the Accident Alert service and to understand the circumstances relating to an accident. By assessing the data, it allows us to provide customers with advice on safer driving.

We will share driving data only in the circumstances shown below:

- With third parties where we need to do so to manage the insurance policy or any claims (e.g. with our accident recovery partners if the car needs to be recovered following an accident)
- Between departments within the company and/or Group. For example:
  - to help reduce fraud, by checking if another person is making a false claim against the driver; or the driver is making a false claim against someone else
  - to encourage safer driving; by examining how various groups drive and at what time of day the most incidents happen
  - to assist in calculating tailored renewal premiums for policyholders
  - to research and refine techniques for analysing Black Box data, including looking at road safety issues such as analysis of certain roads to identify the risks they represent
- Analytics suppliers use the data for research (e.g. to improve road safety). Any information that we share is made anonymous and does not contain any information that is classed as personal data under the data protection regulations. This means that none of the data can be linked to the policyholder

We do not provide policyholders (or their representatives) with driving data for use in civil claims or criminal investigations and proceedings.

Sometimes the Police and other regulatory bodies (such as HMRC or Department of Works & Pensions) may request that we send them information from the Black Box about journeys made in the insured car. This is so they can investigate road traffic accidents, and also work to prevent, detect and investigate criminal and fraudulent activities. We will not normally release driving data or locational data unless the policyholder gives us permission to provide that information; we are required to do so by law (e.g. where the police obtain a Court Order for the information); or we suspect fraud or attempted fraud.

As the telematics data obtained will relate to the car, not necessarily just to the policyholder, it is possible that data relating to any driver may be disclosed when sharing telematics data.

If you would like more information about any of the above uses of your personal information, see the "Contact us ►" section below

### 3.3 If you have been involved in an accident with someone covered under an insurance policy with us

*(This section shows what personal information we collect about you and use if you have made a claim against a policyholder who is insured with us)*

#### **What personal information will we collect and where will we collect it from?**

We will collect the following personal information from you, where relevant to your claim:

- **Individual details:** Your name, address, contact details (e.g. email / telephone), gender, marital status, date of birth, nationality
- **Employment Information:** Your job title and the nature of the industry you work in
- **Identification details:** Your national insurance number, passport information, driving licence number
- **Previous and current claims:** Any previous insurance policies you have held and claims made against those policies
- **Information which may be relevant to your claim**, including the name and contact details of your insurer, details about your car / property, and details about your claim (including any statements, photos / video footage, claims assessment reports, telematics data). This information may include the following **special categories of information** relating to you:
  - **Health Data:** Physical or mental health factors which are relevant to your claim (e.g. where you have been injured in a motor accident and the driver is insured through us). This may include medical records relating to any injuries
  - **Criminal convictions** which are unspent under the Rehabilitation of Offenders Act. This includes both motoring and non-motoring offences / alleged offences which you have committed, or any court sentences which you are subject to
- **Financial Information:** Bank and payment information
- **Website Usage, including Cookies and use of our Live Chat Facility:** See section 3.6 below
- **Other information:** that we capture during recordings of our telephone calls, or if you make a complaint. This may include **special categories of information** you volunteer when communicating with us. We will only process such information to the extent necessary in connection with the incident or where in connection with legal proceedings. Any further processing will only be with your explicit consent.

We use external sources to supplement and verify information the information above, and also to provide the following new information:

- **Credit and Anti-Fraud Data:** Credit history, credit score, sanctions and criminal offences, bankruptcy orders, individual voluntary arrangements (IVAs) or county court judgements, and information received from various anti-fraud databases. Some of this information (e.g. criminal offences) may include **special categories of information** relating to you
- **Demographic data:** Lifestyle indicators such as income, education, and size of your household
- **Open Source Data:** unstructured data which is in the public domain, including social media, about you, or the circumstances of any accident

The external sources that provide us with information about you include:

- Other parties involved in your claim, including any named individual insured through us, passengers, witnesses, or other third party claimants
- Other MS&AD Insurance Group companies
- Third party suppliers we appoint to help us:
  - carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, debt collection agencies, document management providers, outsourced business process management providers, our subcontractors and tax advisors
  - provide a service in relation to a claim (such as external claims handlers, our accident repair network, medical experts, claims investigators and, in limited circumstances, private investigators)
- Credit reference agencies
- Providers of demographic data and vehicle data
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE") and CIFAS

- Insurance industry bodies and databases (including the Motor Insurance Database, the “MID”)
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or professional regulators (e.g. the Financial Conduct Authority)
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media)
- The police and other crime prevention and detection agencies
- Other third parties involved in your insurance policy or a claim (e.g. other insurers)
- Our reinsurers

**What will we use your personal information for?**

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose, and we will rely on the following grounds:

- We have a *genuine business need* to use your personal information (e.g. to keep a record of the decisions we make when different types of applications are made, keep business records, carry out strategic business analysis, review our business planning and develop and improve our products and services). When using your personal information in this way, we will always consider your rights and interests
- We have a *legal or regulatory obligation* to use your personal information (e.g. to meet record-keeping requirements of our regulators)

For **special categories of information**, we must have an additional “legal ground” for processing. We will rely on the following:

- It is in the substantial public interest and it is necessary: i) *for an insurance purpose* (e.g. assessing your insurance application and managing claims; or ii) to prevent and detect and unlawful act (e.g. fraud)
- To *establish, exercise or defend legal rights* (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves)

We’ve shown how we use your personal information, and the legal grounds we rely on, in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
To manage claims	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to assess and pay your claim and manage the claims process</i>)</li> <li>• We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>• To establish, exercise or defend legal rights</li> </ul>
To prevent and investigate fraud	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to prevent and detect fraud and other financial crime</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (<i>where we suspect fraud</i>)</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"> <li>• We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>• To establish, exercise or defend legal rights</li> <li>• It is necessary for an insurance purpose</li> </ul>
To communicate with you and resolve any complaints that you might have	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to send you communications, record and handle complaints</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To provide improved quality, training and security (e.g. through recorded or monitored phone calls to / from us, or customer satisfaction surveys)	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to develop and improve our products and services</i>)</li> </ul>	We will not process your special categories of information for this purpose
Managing our business operations (e.g. keeping accounting records, analysing financial results, meeting audit requirements, receiving professional advice, and holding our own insurance)	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to carry out business operations and activities that are necessary for the everyday running of a business</i>)</li> </ul>	We will not process your special categories of information for this purpose
For insurance administration purposes including trend analysis, actuarial work, pricing analysis, analysis of customer experience, planning service delivery, risk assessment and costs and charges	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to develop and improve our products and services</i>)</li> </ul>	We will not process your special categories of information for this purpose

### **Who will we share your personal information with?**

On occasion, we will share personal information within the MS&AD Insurance Group or with the following third parties for the above purposes:

- Third parties involved in the administration of the relevant insurance policy or claim. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers and other experts including medical experts
- Other insurers (e.g. where another insurer has previously provided you with a policy or handled a claim), and our reinsurers
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers
- Insurance brokers and other intermediaries
- Credit reference agencies
- Insurance industry bodies and databases (including the Motor Insurance Databases, the "MID")
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE")
- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or regulators (e.g. Financial Conduct Authority)
- professional regulators (e.g. the Financial Conduct Authority in the UK)
- The police and other crime prevention and detection agencies

Selected third parties in connection with any sale, transfer or disposal of our business

If you would like more information about any of the above uses of your personal information, see the "Contact us ►" section below.

## 3.4 Where you witnessed an accident involving someone covered under an insurance policy through us

*(This section shows what personal information we collect about you and use if you are a witness to an incident which involves one of our customers)*

### **What personal information will we collect and where will we collect it from?**

We will collect the following personal information from you:

- **Individual details:** Your name, address, contact details (e.g. email / telephone), gender, marital status, date of birth, nationality
- **Employment Information:** Your job title and the nature of the industry you work in
- **Identification details:** Your national insurance number, passport information, driving licence
- **Claims Information:** In relation to any incident or alleged incident that you have witnessed
- **Photo or Video Data:** including photos or footage recorded relating to a claim (including accident circumstances and interviews)
- **Website Usage, including Cookies and use of our Live Chat Facility:** See section 3.6 below
- **Other Information:** that we capture during recordings of our telephone calls, or if you make a complaint. This may include other **special categories of information** you volunteer when communicating with us about the incident that you witnessed. We will only process this information where it relates to the incident itself or legal proceedings. Any further processing will only be with your explicit consent

We use external sources to supplement and verify information the information above, and also to provide the following new information:

- **Claims Assessment Reports:** by claims investigators, and in limited circumstances, private investigators
- **Open Source Data:** unstructured data which is in the public domain, including social media, about you, or the circumstances of any accident

The external sources that provides us with information about you include:

- Other parties involved in the incident you witnessed (such as any named individual insured through us, passengers, other witnesses, third party claimants, brokers, insurers, and the emergency services)

- Other third parties who provide a service in relation to a claim (such as external claims handlers, our accident repair network, medical experts, claims investigators and, in limited circumstances, private investigators)
- Publicly available sources (e.g. the electoral roll, court judgments, insolvency registers, internet search engines, news articles, social media)

Other MS&AD Insurance Group companies

**What will we use your personal information for?**

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose, and we will rely on the following grounds:

- We have a *legal or regulatory obligation* to use your personal information (e.g. our regulators impose certain record-keeping rules which we must adhere to)
- We have a *genuine business need* to use your personal information (e.g. to keep a record of the decisions we make when different types of applications are made, keep business records, carry out strategic business analysis, review our business planning and develop and improve our products and services). When using your personal information in this way, we will always consider your rights and interests

For **special categories of information**, we must have an additional "legal ground" for processing. We will rely on the following:

- *It is necessary for an insurance purpose* and it is in the substantial public interest. This will apply where: (i) we are assisting with any claims under a policy (*we will only rely on this legal ground if we have not been able to obtain or you have not given us your explicit consent*) and; (ii) undertaking any activities to prevent and detect fraud.
- *To establish, exercise or defend legal rights* (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves)

We've shown how we use your personal information, and the legal grounds we rely on, in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
To investigate and manage claims made under an insurance policy	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to assess and pay claims and manage the claims process</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent or it is necessary for an insurance purpose</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"> <li>• We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To prevent and investigate fraud	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to prevent and detect fraud and other financial crime</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• It is in the substantial public interest to prevent or detect unlawful acts (<i>where we suspect fraud</i>)</li> <li>• To establish, exercise or defend legal rights</li> </ul>
For business processes and activities including analysis, review, planning and transactions	<ul style="list-style-type: none"> <li>• We have a genuine business need (<i>to effectively manage our business</i>)</li> </ul>	We will not process your special categories of information for this purpose

**Who will we share your personal information with?**

On occasion, we will share personal information within the MS&AD Insurance Group or with the following third parties for the above purposes:

- Other parties involved in the incident you witnessed
- Other insurers (e.g. where another insurer is also involved in the claim which relates to the incident you witnessed), and our reinsurers
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, accountants, auditors, banks, lawyers, medical experts, and in limited circumstances, private investigators
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers
- Insurance industry bodies and databases (including the Motor Insurance Databases, the "MID")
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE")

- Government agencies and bodies such as the DVLA, HMRC, Department for Work & Pensions, or regulators (e.g. Financial Conduct Authority)
  - The police and other crime prevention and detection agencies
- Selected third parties in connection with any sale, transfer or disposal of our business

If you would like more information about any of the above uses of your personal information, see the "Contact us ►" section below

## 3.5 Suppliers & Partners

*(If you are a point of contact at one of our suppliers or partners, this section will be relevant to you and sets out our uses of your personal information)*

### **What personal information will we collect and where will we collect it from?**

In order to work effectively with you and for ongoing due diligence purposes, we will need to collect some personal information from you which may include:

- **Individual details:** Your name, address, contact details (e.g. email / telephone)
- **Employment Information:** Your job title and the nature of the industry you work in (including potentially previous roles)
- **Identification details:** Items to verify your identity, residency, marital status, address, driving licence details. All of this information will be obtained from you, but can contain **special categories of information** (e.g. a driving licence may show details of any motoring convictions)
- **Criminal convictions** which are unspent under the Rehabilitation of Offenders Act. This includes both motoring and non-motoring offences / alleged offences which you have committed, or any court sentences which you are subject to. All of this information will be obtained from you, but may contain **special categories of information**.
- **Website Usage, including Cookies and use of our Live Chat Facility:** See section 3.6 below
- **Other information:** that we capture during recordings of our telephone calls, or if you make a complaint. This may include **special categories of information** you volunteer when communicating with us (we will not further process these without your explicit consent)

We use external sources to supplement and verify information the information above, and also to provide the following new information:

- **Credit and Anti-Fraud Data:** Credit history, credit score, sanctions and criminal offences, bankruptcy orders, individual voluntary arrangements or county court judgements, and information received from various anti-fraud databases. Some of this information (e.g. criminal offences) may include **special categories of information** relating to you
- **Open Source Data:** unstructured data which is in the public domain, including social media, about you or your company, as part of our due diligence checks

The external sources that provide us with information about you include:

- Other MS&AD Insurance Group companies
- Publicly available sources such as the electoral roll, court judgments, insolvency registers, internet search engines, news articles and social media sites
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions)

### **What will we use your personal information for?**

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose, and we will rely on the following grounds:

- We need to use your personal information because it is necessary *to enter into or perform the contract* that we hold with you (e.g. we may need certain information in order to operate our business partnership arrangement)
- We have a *genuine business need* to use your personal information such as maintaining our business records, keeping records of insurance policies we place and business entities we interact with, and analysing and improving our business model and services. When using your personal information in this way, we have considered your rights and ensured that our business need does not cause you harm
- We have a *legal or regulatory obligation* to use such personal information. (e.g. we may be required to carry out certain background checks)

For **special categories of information**, we must have an additional "legal ground" for processing. We will rely on the following:

- *You have given us your explicit consent* to our use of your special categories of information
- We need to use your special categories of information for purposes relating to managing our business relationship with you there is a *substantial public interest* in such use. Such purposes include preventing and detecting fraud
- *To establish, exercise or defend legal rights* (e.g. legal proceedings are being brought against us or we want to bring a legal claim ourselves)

We've shown how we use your personal information, and the legal grounds we rely on, in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
To enter into business relationships which facilitate and enable us to place insurance policies for our customers	<ul style="list-style-type: none"> <li>• To enter into or perform a contract</li> <li>• We have a genuine business need <i>(to enter into arrangements with other insurance partners so that we can provide services to our customers)</i></li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent</li> </ul>
For business processes and activities including analysis, review, planning and business transactions, and applying for and claiming on our own insurance	<ul style="list-style-type: none"> <li>• We have a genuine business need <i>(to effectively manage our business and to have appropriate insurance in place)</i></li> </ul>	We will not process your special categories of information for this purpose
To carry out fraud and anti-money laundering checks	<ul style="list-style-type: none"> <li>• To enter into or perform a contract</li> <li>• We have a genuine business need <i>(to ensure that we take all necessary precautions to prevent fraud)</i></li> </ul>	<ul style="list-style-type: none"> <li>• The prevention and detection of fraud is in the substantial public interest</li> <li>• To establish, exercise or defend legal rights</li> </ul>
To comply with our legal or regulatory obligations	<ul style="list-style-type: none"> <li>• We have a legal or regulatory obligation</li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent</li> <li>• To establish, exercise or defend legal rights.</li> </ul>
Providing improved quality, training and security (e.g. through recorded or monitored phone calls to / from us)	<ul style="list-style-type: none"> <li>• We have a genuine business need <i>(to develop and improve our products and services)</i></li> </ul>	We will not process your special categories of information for this purpose
To manage and handle your queries	<ul style="list-style-type: none"> <li>• To enter into or perform a contract</li> <li>• We have a genuine business need <i>(to effectively manage our business and respond to queries)</i></li> </ul>	<ul style="list-style-type: none"> <li>• You have given us your explicit consent</li> </ul>

### **Who will we share your personal information with?**

On occasion, we will share personal information within the MS&AD Insurance Group or with the following third parties for the above purposes:

- Our policyholders and other third parties such as claimants where relevant
- Third parties involved in the administration of an insurance policy or claim. These include loss adjusters, claims handlers, accountants, auditors, banks, lawyers, medical experts, and in limited circumstances, private investigators
- Our insurance partners such as other brokers, insurers and our reinsurers.
- Insurance industry bodies and databases (including the Motor Insurance Databases, the "MID")
- Third party suppliers we appoint to help us carry out our everyday business activities including IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions) including the Claims Underwriting Exchange (known as "CUE")
- Government agencies and bodies such as regulators (e.g. Financial Conduct Authority)
- The police and other crime prevention and detection agencies

Selected third parties in connection with any sale, transfer or disposal of our business

If you would like more information about any of the above uses of your personal information, see the "Contact us ►" section below.

### 3.6 Users of our websites

(This section will detail what personal information we collect about you and use if you access and use any of our websites.)

#### **What personal information will we collect and where will we collect it from?**

We will share some website experience data with trusted third parties to help us improve the service we provide to you. This data will never be special category data. If possible this data will be irreversibly anonymised and therefore no longer attributable to you. Where data cannot be anonymised it will include personal data shared by most web browsers such as (but not limited to) your IP address, location, operating system, web pages visited and areas of those web pages 'hovered' over, and will be sent only to our providers of demographic data and data analytics. Here is a list of the providers and what they help us to do:

- **Google Analytics** (<https://policies.google.com/privacy?hl=en-GB>) help us to measure the performance of your web experience and analyse usage so that we can improve your journey; information may be sent outside of the EEA but if so will be anonymised by us or on receipt
- **NCC** (<https://www.nccgroup.trust/uk/about-us/privacy-policy/>) help us to ensure our online journey moves at an effective pace. This involves using some data sent by your browser; information may be sent outside of the EEA but if so will be anonymised on receipt
- **Mouseflow** (<https://mouseflow.com/privacy/>) help us to track page sessions and create heat maps so that we can quickly diagnose and analyse any problems with usability; information is never sent outside of the EEA and is automatically anonymised
- **Live Person** (<https://www.liveperson.com/uk/policies/privacy>) help us to manage our Live Chat service, to provide you with the most effective user experience when handling your policy queries via the service; information may be sent outside of the EEA but it will be suitably secure and may be subject to anonymisation.

We have provided you with links to each of their websites so that you may take the time to read up on their data protection policies yourself.

#### **What will we use your personal information for?**

We may process your personal information for a number of different purposes. We must have a legal ground for each purpose, and we will rely on the following ground:

- We have a genuine business need to use your personal information such as maintaining our business records, monitoring usage of our websites and improving our business model and services. When using your personal information in this way, we have considered your rights and ensured that our business need does not cause you harm.

We've shown how we use your personal information, and the legal grounds we rely on, in the table below:

Type of Processing	Grounds for using personal information	Grounds for special categories
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"><li>• We have a genuine business need (to respond to any enquiries)</li></ul>	We will not process your special categories of information for this purpose
Monitoring usage of our websites	<ul style="list-style-type: none"><li>• We have a genuine business need (to assess usage of our websites)</li></ul>	We will not process your special categories of information for this purpose

If you would like more information about any of the above uses of your personal information, see the "Contact us ►" section below.

## 4 What is our approach to sending your personal information abroad?

Sometimes we (or third parties acting on our behalf) will transfer personal information that we collect about you to countries outside of the European Economic Area ("EEA").

Where a transfer occurs we will take steps to ensure that your personal information is protected. We will do this using a number of different methods including:

- putting in place appropriate contracts. We will use a set of contract wording known as the "standard contractual clauses" which has been approved by the data protection authorities
- transferring personal data only to those companies in the United States who are certified under the "Privacy Shield". The Privacy Shield is a scheme under which companies certify that they provide an adequate level of data protection. You can find out more about the Privacy Shield at: <https://www.privacyshield.gov/Individuals-in-Europe>

Country of transfer	Reason for the transfer	Certification
United States of America	To assist in the collection of information by mailshot surveys & other analytical tools	Privacy Shield
United States of America	To assist Mouseflow Inc. to provide the web experience service as detailed above	Privacy Shield
United States of America	To assist LivePerson Inc. to provide our Live Chat service as detailed above	Privacy Shield
Republic of South Africa	To assist BulksMS to provide us with a service to contact customers via SMS	Standard contractual clauses

If you would like more information regarding our data transfers, see the "Contact us ►" section below.

## 5 Marketing

We take privacy very seriously and will only use your personal information for the purposes laid out in this Privacy Policy. Unless you have opted out, we may contact you about marketing on behalf of Tesco Bank. Please refer to the 'Will Tesco Bank send me marketing information?' section within the Tesco Bank Privacy Notice to understand how we use information for marketing purposes.

Please be aware that we have a genuine business need to be able to contact you to discuss how your policy is being administered. This form of contact falls outside of your marketing preferences and must continue in order for us to be able to provide you with a policy effectively. This will never include marketing material and all information will be strictly related to your policy.

## 6 How long do we keep your personal information for?

We will keep your personal information for as long as reasonably necessary to fulfil the purposes set out in section 3 above and to comply with our legal and regulatory obligations. We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time period will depend on the purpose for which we collect that information, for example:

Quotes:	15 months
Policies, including telematics data:	7 years
Claims:	7 years
Complaints:	7 years

In some circumstances depending on the nature of your policy and any claims made under it data may be retained for a further period in a 'locked down' system from which it is only accessed when a claim arises. It is retained for as long as a potential claim might be made under a policy.

For more information about how long your personal information will be kept, see the "Contact us ►" section below.

## 7 Automated Processing

Where we have to make a decision about your insurance policy then most of the time we make decisions using automated processing. The process considers the information that you provide us as well as information from other sources such as search tools (e.g. Experian) to determine whether your application for insurance can be accepted and the premium price.

## 8 Your Rights

Under data protection law you have a number of rights in relation to the personal information that we hold about you. You can exercise these rights by contacting us. We will not usually charge you in relation to a request.

<b>The right to access your personal information</b>	You are entitled to a copy of the personal information we hold about you and certain details of how we use it. We will usually provide your personal information to you in writing unless you request otherwise. Where your request has been made electronically (e.g. by email), a copy of your personal information will be provided to you by electronic means where possible.
<b>The right to rectification</b>	We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. If you believe that there are any inaccuracies, discrepancies or gaps in the information we hold about you, you can contact us and ask us to update or amend it.
<b>The right to erasure</b>	This is sometimes known as the 'right to be forgotten'. It entitles you, in certain circumstances, to request deletion of your personal information. For example, where we no longer need your personal information for the original purpose we collected it for or where you have exercised your right to withdrawn consent. Whilst we will assess every request, there are other factors that will need to be taken into consideration. For example we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.
<b>The right to restriction of processing</b>	In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to use your personal information.
<b>The right to data portability</b>	In certain circumstances, you can request that we transfer personal information that you have provided to us to a third party.
<b>The right to object to marketing</b>	You have control over the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" button in any email that we send to you or by contacting us using the details set out in section 10. Please note that even if you exercise this right because you do not want to receive marketing messages, we may still send you service related communications where necessary.
<b>The right to object to processing</b>	In addition to the right to object to marketing, in certain circumstances you will have the right to object to us processing your personal information. This will be when we are relying on there being a genuine business need to process your personal information. Please note, in some circumstances we will not be able to cease processing your information, but we will let you know if this is the case.
<b>Rights relating to automated decisions</b>	If you have been subject to an automated decision and do not agree with the outcome, you can ask us to review it.
<b>The right to withdraw consent</b>	Where we rely on your consent in order to process your personal information, you have the right to withdraw such consent to further use of your personal information. Please note that for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent
<b>The right to lodge a complaint with the ICO</b>	You have a right to complain to the Information Commissioner's Office if you believe that any use of your personal information by us is in breach of applicable data protection laws and / or regulations. More information can be found on the Information Commissioner's Office website: <a href="http://www.ico.org.uk">www.ico.org.uk</a> . This will not affect any other legal rights or remedies that you have.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request such as where complying with it would mean that we couldn't comply with our own legal or regulatory requirements. In these instances we will let you know why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request erasure of your personal information, we would not have the information required to pay your claim. We will inform you of this at the time you make a request.

## 9 How we protect your information ►

The protection of your personal data is important to us. We take a number of technical and procedural measures to protect personal data. For example:

1. Where we capture your personal information through our websites, we will do this over a secure link using recognised industry standard technology (SSL) which encrypts data that is transmitted over the internet. Most browsers will indicate this by displaying a padlock symbol on the screen
2. We prevent unauthorised electronic access to servers by use of suitable firewalls and network security measures. We use strong internal antivirus and malware monitoring tools and conduct regular vulnerability scans to protect our internal infrastructure and also to protect communications we may send you electronically. Our servers are located in secure datacentres that are operated to recognised industry standard. Only authorised people are allowed entry and this is only in certain situations
3. We ensure that only authorised persons within our business have access to your data and conduct regular checks to validate that only the correct people have access. We promote responsible access to data and segregate who can see what data within the organisation
4. Internally in our organisation, we have password policies in place which ensure passwords are strong and complex and are changed regularly
5. We use secure email exchange where necessary for sensitive data and have monitoring on all email we send and receive
6. We schedule periodic checks of all security measures to ensure they continue to be efficient and effective, taking into account technological developments.

## 10 Contact us ►

You may contact our Data Protection Officer if you would like to exercise the rights set out above, or if you have any questions about how we collect, store or use your personal information:

✉ The Data Protection Officer, Insure The Box Limited, PO Box 1308, Newcastle upon Tyne, NE12 2BF  
📧 [DPO@boxins.tescobank.com](mailto:DPO@boxins.tescobank.com)

## 11 Updates to this Privacy Policy ►

We may need to make changes to this Privacy Policy periodically, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally or where we identify new sources and uses of personal information (provided such use is compatible with the purposes for which the personal information was original collected). The Data Protection Officer will ensure that this document is updated regularly or as legislation requires. This Privacy Policy was last updated on 30<sup>th</sup> April 2018

## Tesco Bank Key Cover Privacy Notice

Tesco Bank Key Cover is underwritten by Ageas Insurance Limited, claims are handled by Keycare Limited.

### What personal data do Keycare hold about me?

Key Care Limited (Keycare) has received your personal data directly from the firm who sold you your Keycare Insurance Policy. The personal data consists of the following (or some of it): full name and title, full address, date of birth, contact telephone numbers, email address, make and model of vehicle and vehicle registration number.

### What do Keycare do with my personal data?

Keycare is a Data Controller in relation to the data that it processes about you. The firm who sold you your Keycare Policy is also a data controller in relation to any data that they process about you and they will process data in accordance with their own Privacy Policy.

Keycare will use your personal data for any one or more of the following purposes:

- To administer the Policy;
- To communicate with you for any purpose in relation to the Policy (including renewal options) by letter, telephone, fax, email or text message;
- To communicate with the firm who sold you your Keycare Policy for any purpose in relation to the Policy by letter, telephone, fax or email.

### What is Keycare's legal basis for holding my personal data?

The legal basis of processing is:

- That the processing is necessary for the performance of the contract of insurance namely the Policy (including sending your documents to you, dealing with any claim and administration of the policy), and
- That the processing is necessary for the purposes of the legitimate interests pursued by Keycare (including sending you a renewal notice or for any other matters arising from the Policy not covered in the bullet point above)

### Will Keycare transfer my personal data to third parties?

Keycare may transfer your personal data:

- To the Insurer (Ageas Insurance Limited) and communicate with the Insurer in relation to the Policy by letter, telephone, fax or email. The Insurer may use your personal data for all purposes relating to the Policy and its underwriting and may communicate with you in relation to the Policy by letter, telephone, fax or email.
- To third parties where this is necessary or desirable for the legitimate business interests of Keycare or as required by law.
- Keycare will transfer your personal data to third parties where this is necessary to administer the Policy. Such third parties include locksmiths and key providers providing services under the Policy who may in turn from time to time use third parties to perform such services. They may use your personal data to provide services to you under the Policy and may communicate with you by letter, telephone, fax, email or text message in relation to this policy.

### Will Keycare transfer my personal data outside the EEA?

Keycare will only transfer your data to third parties within the EEA.

### How long will Keycare hold my personal data?

Keycare will update your personal data from time to time based on information received from you directly. In order to comply with tax, financial services regulations and other applicable legislation Keycare will hold your personal data for the duration of the Policy and for six years after it ends at which time it will be destroyed.

### Will Keycare use my personal data for marketing?

Keycare will not use your personal data for marketing purposes (other than to contact you prior to the expiry of the Policy in connection with its renewal).

## What are my rights under Data Protection legislation?

You have the right to request from Keycare access to and rectification or erasure of personal data or restriction of processing concerning you and to object to processing. In addition you have the right to data portability. Any questions you may have about data protection should be addressed to the Operations and Compliance Manager at Keycare at the address below.

You have the right to lodge a complaint with the Information Commissioner's Office ([ico.org.uk](http://ico.org.uk)).

## How do I object to Processing of my Personal Data by Keycare?

Keycare may process your personal data for the purposes of its legitimate interests and we may use your personal data for direct marketing, including marketing key protection products (or other similar products) to you, in circumstances where this is considered to be appropriate, including contacting you prior to the expiry of your Keycare Insurance Policy in connection with its renewal. You have the right to object to processing by Keycare for direct marketing purposes and/or for the purposes of Keycare's legitimate interests.

If you wish to exercise this right, please contact the Operations and Compliance Manager at the address below.

Key Care Limited

2-3 Quayside House, Quayside, Salts Mill Road, Shipley, West Yorkshire, BD18 3ST.

Telephone: **0345 303 0550** Email: **customerservices@keycare.co.uk**

Keycare Limited is authorised and regulated by the Financial Conduct Authority registration number 309514. Registered in England number 01309093, registered office - 2-3 Quayside House, Quayside, Salts Mill Road, Shipley, BD18 3ST.

# Tesco Bank Box Breakdown Cover Privacy Notice

## Your Data

Tesco Bank Box Insurance Breakdown Cover is provided by RAC Motoring Services and/or RAC Insurance Limited. This section provides a short summary of how we, RAC Motoring Services and/or RAC Insurance Limited, collect and use your data. If you would like to find out more about how RAC Motor Services and/or RAC Insurance Limited you can contact us using the email address below or by visiting our website [www.rac.co.uk](http://www.rac.co.uk)

## What personal data do RAC hold about me?

There are three types of data we will hold about you:

- Personal data is information we hold on our records which identifies you. This includes your name, address, email address and telephone number;
- We will also hold data about you that is not personal, for example, information about your vehicle; and
- A small number of our products and services require us to collect and store special categories of personal data. We will only ask for this data when it is absolutely necessary and in accordance with data protection laws.

## How we obtain and collect your data

Your data may be collected in a number of different ways. For example, when your details are passed to us by Insure the Box Limited for the provision of breakdown services, when you contact us through social media or make a claim under your policy. We will always need to collect, store and use information about you to be able to provide you with your policy.

Please note, if you do not provide your data we will be unable to provide you with cover, as well as services related to administering your policy.

## How we will use your data

We will use your data for the administration of your policy, for example, helping you if you make a claim. We may disclose your personal data to our service providers who provide help under your policy. We also monitor and record any communications with you including telephone conversations and emails for quality and compliance reasons.

## Marketing

RAC will not use information about Tesco Bank Box customers for marketing purposes.

## Your rights

You have a number of rights relating to your personal data. For further information regarding any of these rights please visit [www.rac.co.uk/privacy-policy](http://www.rac.co.uk/privacy-policy) or contact the Data Protection Officer:

Call our Customer Service Team: **0330 159 0360**; or

Email us: [breakdowncustomercare@rac.co.uk](mailto:breakdowncustomercare@rac.co.uk); or

Write to us:

Freepost RTLA-HZHB-CESE  
RAC Financial Services Limited  
Customer Services Team  
PO Box 586  
Bristol  
BS34 9GB