

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

Tesco Personal Finance (trading as Tesco Bank) acts as an intermediary for this policy. The policy is arranged and administered by Ageas Retail Limited and underwritten by Ageas Insurance Limited (collectively referred to as Ageas).

This Privacy Notice is split into two parts. Part 1 explains how we, Tesco Personal Finance plc, trading as Tesco Bank and part of the Tesco Group (www.tescopl.com/about-us/) ("Tesco Bank") and in Part 2, explains how Ageas use your personal data.

In Part 1 of this Privacy Notice, "we", "us" and "our" refers to Tesco Bank. In Part 2 of this Privacy Notice "we", "us" and "our" refers to Ageas 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.

Part 1

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 (this includes personal data you may store in the 'save and retrieve' function before you submit a quote). It also includes personal data you give us any time you write to us or contact us electronically.

We keep data about your policies

This includes transactions and payments you make and receive.

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

This includes anybody insured under your policy or paying your premiums.

We will also keep any personal data you give us about anyone nominated to act on your behalf (this is for the security questions they need to answer before they can change anything on your policy).

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 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

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 insured persons?

We keep data that you give to us about insured persons

We will keep and use personal data you provide to us about people that are covered by our insurance policies.

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 or in the case of a child, their legal guardian. You must also make sure you have their, or in the case of a child, their legal guardian's 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

We use your personal data to provide our services to you

To provide our services to you we will need to use your personal data, and personal data relating to insured persons and anyone else whose personal data is connected with providing a particular product or service.

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 and others include:

- maintaining and updating your policy
- awarding Clubcard points

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

We can only provide our products or 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
- tracing and recovering debt
- 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 **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

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 the insurer shown on your policy schedule
- with other companies, (if we are, or are considering, transferring the rights and obligations we have with you)
- with another travel insurer, if we have invited you to renew your travel insurance with them
- with Tesco Group and Tesco stores, in connection with your Clubcard (for example, to allocate points or discounts, or where you have agreed to receive marketing)
- with other Tesco Group companies. 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 policies have lapsed for up to 10 years.

When you have applied but not taken out a product

We keep insurance quote data for up to 7 years. 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

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.

Information about insurance claims is held by Ageas

If you want to see what data Ageas hold, you need to contact them directly.

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**

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.

Part 2

Ageas Privacy Notice

1. Who we are and our approach to your privacy

In this Privacy Notice, 'we', 'us' and 'our' refers to one or more of the subsidiary companies of Ageas (UK) Limited. This includes Ageas Insurance Limited (data controller registration number Z5472176) and Ageas Retail Limited (data controller registration number Z5667691) and their various trading entities.

The privacy and security of your personal information is very important to us so we want to assure you that your information will be properly managed and protected whilst in our hands. Please read this notice carefully as it explains how we and/or carefully selected third parties we work with, collect and use your personal information.

You can ask for more information about our use of your personal information or complain about its use, by contacting our Data Protection Officer at: Ageas House, Hampshire Corporate Park, Templars Way, Eastleigh, Hampshire, SO53 3YA or by emailing thedpo@ageas.co.uk

2. What information do we collect and where do we get it from?

In order for us to provide our services to you and to manage those services, we will ask you to share your personal information with us. The circumstances in which we use your information, the reasons why we ask for it and details of how we will use it are explained in section 3 of this notice. The information we collect about you varies, depending on your particular circumstances and requirements and may include, for example:

- General information about you, such as your name, address, contact details and date of birth
- Information about what and/or who you want to insure, such as vehicle details and named drivers, your home, travel details and companions
- Your claims and credit history
- Criminal convictions
- Financial details, such as your bank account and card details
- Special categories of personal information (previously known as 'sensitive personal information'), such as information about your health
- Information about your use of our website such as your IP address, which is a unique number identifying your computer

We may collect personal information from the following sources:

- You or someone connected to you as part of a quotation or claim
- Publicly available sources of information, such as social media and networking sites
- Third party databases made available to the insurance industry, as well as databases where you have given your permission to share information with a third party like us. For more information about these sources, please contact the Data Protection Officer using the details set out in section 1 of this notice
- Price comparison websites, if you've had a quote for a policy with us. The information you provided is shared with us and used for the purposes set out in section three of this notice. The information in this notice will apply in addition to any information given to you by that price comparison website about the use of your personal information

If you have given us information about someone else, you would have confirmed that you have the consent of these individuals to share their personal information with us. You should share this privacy notice with all individuals whose personal information you have shared with us, as it may also apply to them.

3. Why do we collect this information and how will we use it?

We and/or our carefully selected third parties may collect and use your personal information under the following circumstances or for the following reasons:

a) To provide you services relating to an insurance quotation and/or insurance policy such as:

- assessing your insurance application and arranging your insurance policy, such as checking databases showing no claims discount entitlement and driving licence records
- managing your insurance policy including claims handling and issuing policy documentation to you
- providing you with the services described in your policy documents

The collection and use of information such as your name, address, date of birth, claims history, what/who you would like to insure and medical conditions for travel insurance and conviction details for motor insurance is necessary to provide you with a quotation and/or policy. Without this information, we will be unable to assess your application and/or provide claims services. Our assessment of your insurance application may involve an automated decision to determine whether we are able to provide a quotation and/or the price. The decisions involve the use of systems, such as our price rating and acceptability tools and are dependent on the information you provide us – for example: post code, vehicle type and conviction details for motor insurance, health details for travel insurance and/or type of property for home insurance – to produce a result as to whether we are able to provide a quotation and/or what the relevant price for your policy should be. If you object to an automated decision that is required to determine your insurance premium, then we will be unable to provide you with an insurance quotation or renewal.

b) Where we have a justifiable reason (also known as a legitimate interest), such as:

- keeping records about you and our correspondence with you as well as your current and past insurance policies and history of insurance claims. This is so that we can appropriately and effectively manage our relationship with you as well as satisfy any legal and regulatory obligations we may have to keep such records
- preventing and detecting fraud, financial crime and anti-money laundering. We may use your personal information to prevent fraud and in doing so may:
 - collect personal information about you from databases as described in this notice and from publically available sources, such as social media and networking sites
 - check your personal information against databases including databases showing no claims discount entitlement and driving licence records
 - share your personal information with fraud prevention agencies. Your personal information will be checked with and recorded by a fraud prevention agency. If false or inaccurate information is provided and fraud is identified, details will be passed to the fraud prevention agency. This information will be accessed and used by us, law enforcement agencies and other organisations to prevent fraud and money laundering, for example: when checking details on applications for credit and credit related or other facilities; managing credit and credit related accounts or facilities; recording debt; checking details on proposals and claims for all types of insurance; and checking details of job applicants and employees. Other organisations may search the databases held by these fraud prevention agencies when you make an application to them for financial products. If such companies suspect fraud, we will share your personal information with them. The information we share may be used by those companies when making decisions about you. We and other organisations may access and use, from other countries, the information recorded by fraud prevention agencies
 - share your personal information with operators or registers available to the insurance industry to check information you provide. These include the Claims and Underwriting Exchange Register and Motor Insurance Anti-Fraud and Theft Register. We may pass information relating to your insurance policy and any incident to the operators of these registers, their agents and suppliers
 - use any personal information obtained about you, or anyone you have provided us information about, to carry out the above profiling activity as part of our investigations into fraudulent behaviour. Should fraud be identified as a result of such profiling activity, this could result in the rejection of an application for insurance, a claim and/or avoidance of your policy
- provide sales information to third parties, such as a price comparison website which you may have used to purchase a policy with us, so that we can fulfil our contractual responsibilities to them

- carrying out processes, such as statistical and trend research and analysis, which may include computerised processes which profile you. This is to better understand, predict and forecast our customer's or prospective customer's preferences and to improve the products and services we offer
- using information collected from databases we use together with the personal information you give us, to help us to improve and develop our internal databases and systems, such as those used for assessing the risks we insure and communicating with you, in order to improve the products and services we offer. For more information about how we communicate our products and services, please refer to section 4 of this notice
- we may anonymise and combine the information you have given us to understand more about you, create new products and services as well as helping us with our marketing
- recording and monitoring calls for training purposes, to improve the quality of our service, to help us deal with queries or complaints from you and to prevent and detect fraud and financial crime. We may also use CCTV recording equipment in and around our premises for monitoring and security purposes

For details about how we communicate with you and information about your use of our websites and email communications, please refer to section 4 of this notice.

We may share your information with third parties in order to carry out the above activities. For further details about who we might share your information with, please refer to section 5 of this notice.

4. How we communicate with you and information about your use of our websites

We may contact you if you fail to complete an online quotation to see if we can offer you any help with this. You can ask us to stop contacting you about our products and services by:

- **Email** – thedpo@ageas.co.uk
- **Post** – Ageas House, Hampshire Corporate Park, Templars Way, Eastleigh, Hampshire, SO53 3YA

When you visit one of our websites we may collect information from you, such as your email address, IP address and other online identifiers. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit. We use third parties to collate IP addresses to help us understand our Internet traffic data and data regarding your browser type and computer.

We may use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website, but not on your computer. Pixel tags usually work together with cookies to help us to give you a more tailored service. We also use cookies and pixel tags in our email communication to personalise the email and track whether the email has been opened and whether the recipient has used any website links contained in the email communication. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found at <http://allaboutcookies.org>

Internet browsers normally accept cookies by default, although it's possible to set a browser to reject cookies. We will ask your permission before using any cookie that is not essential to the email or the use of the website. However, refusing to accept cookies may restrict your use of our website and/or delay or affect the way in which our website operates. Visit www.ageas.co.uk/cookies/ for more information about cookies.

The open nature of the internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. Whilst this is outside of our control, we do take the protection of your information very seriously and aim to apply appropriate levels of security at all times.

5. Who might we share your information with?

We may share your personal information with:

- other insurers, business partners, agents or carefully selected third parties providing a service to us or on our behalf, such as processing our mail, communicating with customers on our behalf via social media, providing IT systems and administrative services, claims handling services and the development and improvement of our internal databases

- organisations that have a specific role laid out in law, such as statutory bodies, regulatory authorities and other authorised bodies
- other organisations where we have a duty to or are permitted to disclose your personal information by law, for example if we received a valid request from the police or other third party organisation in the interest of preventing and detecting crime
- fraud prevention agencies and operators of registers available to the insurance industry to check information and prevent fraud. This is outlined in more detail under section three of this privacy notice
- credit reference agencies to check your credit history. This check will be recorded on your credit reference file without affecting your ability to apply for credit or other financial products
- third parties we use to recover money you may owe us or to whom we may sell your debt
- other insurers, insurance brokers or intermediaries to whom we may decide to sell any specific insurance policies. Should we want to do this, we will advise you in good time, so that you can object
- another company, if our business or part of it is bought or taken over by that company to make sure your insurance policy can continue to be serviced or as part of preliminary discussions with that company about a possible sale or take over
- other companies when we are trialing their products and services which we consider may improve our services to you or our business processes
- other third parties if you have given us your permission to do so, or there is sufficient reason to believe they are acting on your behalf

Unless required by law, we would never share your personal data without the appropriate and necessary care and safeguards being in place.

6. How long will we keep your information?

We will only keep your information for as long as is reasonably necessary for the purposes set out in this privacy notice and to fulfil our legal and regulatory obligations. For further information about how long we will keep your information, please contact the Data Protection Officer using the contact details outlined in section 1 of this notice.

7. Use and storage of your information overseas

The personal information we and our carefully selected third parties collect from you may be transferred to, stored and processed outside the European Economic Area (EEA). We or our service providers may use cloud based computer systems, (that is, a network of remote servers hosted on the internet which process and store your information), to which foreign law enforcement agencies may have the power to require access. We will not transfer your information outside the EEA unless it was to a country our information regulator has assessed as having adequate data protection laws, or we had taken all reasonable steps to ensure the firm has the necessary privacy and security controls in place to protect your information as if it were in the EEA. Our contracts with these firms will detail the necessary requirements to ensure your information is protected. We will assess these firms' security arrangements from time to time, ensuring they are only using your information as agreed. If you would like more information about the safeguards we have in place, please contact the Data Protection Officer whose contact details are outlined in section 1 of this notice.

8. How will we deal with others acting on your behalf?

To help manage your insurance policy, we will deal with individuals you nominate, including third parties we reasonably believe to be acting on your behalf, provided they are able to answer our security questions. However, for your protection, if you need to change your contact address, policy coverage or cancel your policy, we will need to either speak to you directly, your legal representative, someone you have nominated and given us permission to discuss your personal details, or someone who holds power of attorney for you.

9. Your rights

You have a number of rights concerning the personal information we use, these include the right to:

- ask for access to and a copy of your personal information
- ask us to correct or delete your personal information

- ask us to restrict or object to the use of your personal information at any time
- ask us to move, copy or transfer your personal information to a third party (known as 'data portability')
- where you have previously given us your permission to use your personal information, withdraw that permission. Where your permission is withdrawn, your previous consent will remain valid in respect of our use of your information prior to the date you withdrew it, or if any marketing material has been sent prior to you advising that you do not want us to contact you again
- complain to the Information Commissioner's Office at any time if you object to the way we use your personal information. For more information please go to **www.ico.org.uk**
- object to an automated decision, including profiling. For details about the profiling activity we undertake, please refer to section 3 of this notice

To discuss your rights or make a request, please contact the Data Protection Officer using the details outlined in section 1 of this notice.

Please note, in some cases even when you make a request concerning your personal information, we may not be required, or may not be able, to honour it as this may result in us not being able to fulfil our legal and regulatory obligations or there is a minimum statutory period of time for which we have to keep your information. If this is the case, we will let you know our reasons.

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