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# Privacy Notice

## 1. About HSBC Select and Cover

This privacy notice applies to personal information collected about you in relation to HSBC Select and Cover.

This privacy notice should be read alongside the HSBC Select and Cover Terms and Conditions.

HSBC UK Bank plc acts as insurance intermediary for the purposes of HSBC Select and Cover.

HSBC UK Bank plc are permitted by the underwriter(s) below to promote, sell and service your HSBC Select and Cover policy.

The underwriter(s) of your policy will depend on the Options you select:

- RAC Insurance Limited is the underwriter, and RAC Motoring Services is a provider, if you select the Motor Breakdown Option.
- Aviva Insurance Limited is the underwriter if you select the Worldwide Travel Option, Excess Protection Option, Mobile Phone Option or Gadget Option.
- Aviva Insurance Limited is the underwriter and HomeServe Membership Limited is its agent, if you select the Home Emergency Option.
- HSBC Life (UK) Limited is the underwriter if you select the Starter Life Option. Aviva Insurance Limited acts as an agent for HSBC Life (UK) Limited in relation to collection of the premium.

When you click 'log-on' and enter your online banking credentials to access HSBC Select and Cover platform, HSBC UK Bank plc will securely pass your personal information to Aviva Insurance Limited. This is to enable Aviva Insurance Limited to display the options that are available to you on HSBC Select and Cover platform and to enable Aviva Insurance Limited to provide and service your HSBC Select and Cover policy.

The data controllers responsible for the personal information collected for your HSBC Select and Cover insurance are:

1. HSBC UK Bank Plc 1 Centenary Square, Birmingham, B1 1HQ, in respect of information it already holds about customers e.g. as a banking customer as well as other information that it collects or processes as controller. It will share this information with HSBC Select and Cover insurers whose options you select, for insurance purposes, to enable the insurers to underwrite and administer your HSBC Select and Cover policy and manage any claims.
2. HSBC Life (UK) Limited, 8 Canada Square, Canary Wharf, London E14 5HQ, if you select the Starter Life Option.
3. Aviva Insurance Limited is the data controller in respect of your personal information it receives from HSBC as insurance intermediary and also in respect of any information it collects directly from you, or from other sources, as set out in its respective privacy notice.
4. RAC Motoring Services (RACMS) Registered No: 01424399 Registered Office is RAC House, Brockhurst Crescent, Walsall, WS5 4AW is the data controller if you select Motor Breakdown Option, to enable the insurers to underwrite, manage any claims or request for service or benefit and for administering the HSBC Select and Cover Motor Breakdown Option.

You should read the data controllers' respective privacy notices for more information on how they will use your information, your data protection rights and how you can exercise them.

## 2. HSBC Privacy Notice Overview

### An overview of how we will collect your data and use your information

This Privacy Notice provides an overview of:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure.

We'll also explain your rights to your information. This is just an overview of some key points. A full description is contained in the full HSBC Privacy Notice which you can obtain by visiting [www.hsbc.co.uk/privacy](http://www.hsbc.co.uk/privacy) or by writing to: HSBC Customer Service Centre, BX8 7HB addressed 'for the attention of the DPO'.

### Who we are

When we say 'we' or 'us', we mean:

- HSBC UK Bank plc, registered in England and Wales number 9928412. Registered office 1 Centenary Square, Birmingham, B1 1HQ. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under registration no. 765112. And
- HSBC Life (UK) Limited registered in England (United Kingdom) number 88695. Registered office 8 Canada Square, Canary Wharf, London E14 5HQ. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under registration no.133435 if you select the Starter Life Option.

### What information we collect

We collect information about you from different places including:

- directly from you
- from publicly available sources
- when we generate it ourselves
- from other organisations.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past. You're responsible for making sure you give us accurate and up to date information. If you provide information for another person on your policy, you'll need to direct them to this Privacy Notice and make sure they agree to us using it for the purposes set out in this Privacy Notice.

### How we will use your information

We'll use it to provide you with any products and services you've requested and other purposes including for example:

- to confirm your identity and address
- to understand how you use any other accounts, products or services you hold with us
- to carry out your instructions
- to improve our products and services
- to offer you other services we believe may benefit you unless you've asked us not to.

We'll only use your information where we're allowed to by law, including for example, carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

We may use automated systems to help us carry out fraud and money laundering checks.

### Who we can share your information with

We may share your information with other companies we work in partnership with and other HSBC Group members. We may also share your information with others outside of the HSBC Group including regulators (e.g. the Financial Conduct Authority), insurers, other banks, brokers, agents as well as credit reference and fraud prevention agencies.

### Sensitive information

If insurers require this, we or they may ask you to provide sensitive health information that they need for insurance purposes to enable them to underwrite your policy, administer your policy, or process a claim. We will keep this information secure and process it in accordance with relevant laws and regulations.

## How long we will keep your information

We'll keep your information for as long as you have a relationship with us. After it ends we'll keep it where we may need it for our legitimate purposes, to help us respond to queries or complaints, or for other legal and regulatory reasons, including for example, fighting fraud and financial crime and responding to requests from regulators.

## Transferring your information overseas

Your information may be transferred and stored in countries outside the European Economic Area (EEA), including some that may not have laws offering the same level of protection for personal information. When we do this, we'll ensure an appropriate level of protection is maintained

## Your rights

You have a number of rights relating to your information e.g. to see what we hold, to ask us to share it with another party, ask us to update incorrect or incomplete details, to object to or restrict processing of it etc.

For a fuller statement of your rights please see the full HSBC Privacy Notice. You can view or download a copy by visiting [www.hsbc.co.uk/privacy](http://www.hsbc.co.uk/privacy) or if you can ask us for a copy in branch.

## More Information

If you'd like further information on anything we've said in this Privacy Notice, or to contact our Data Protection Officer, contact us at HSBC Customer Service Centre, BX8 7HB addressed 'for the attention of the DPO'.

## 3. Aviva Privacy Notice Overview

In this section "we", "us" and "our" means Aviva Insurance Limited.

This notice explains the most important aspects of how we use your information but you can get more information about the terms used and view the full privacy policy at [www.aviva.co.uk/privacypolicy](http://www.aviva.co.uk/privacypolicy) or request a copy by writing to: Aviva, Freepost, Mailing Exclusions Team, Unit 5, Wanlip Road Ind Est, Syston, Leicester, LE7 1PD.

### Personal information we collect and how we use it

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

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

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

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

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

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

Some of the information we use as part of this application may be provided to us by a third party. This may include information already held about you within HSBC UK Bank Plc and/or the Aviva group, including details from previous quotes and claims, information we obtain from publicly available records, our trusted third parties and from industry databases, including fraud prevention agencies and databases.

### **Credit Reference Agency Searches**

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

The identity of the credit reference agency and the ways in which they use and share personal information, are explained in more detail at [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain).

### **Automated decision making**

We carry out automated decision making to decide whether we can provide insurance to you and on what terms, deal with claims or carry out fraud checks.

### **How we share your personal information with others**

Your personal information may be shared:

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

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

### **How long we keep your personal information for**

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

### **Your rights**

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

### **Contacting us**

If you have any questions about how your personal information will be used in relation to your Select and Cover policy, or if you want to exercise your rights stated above, please contact our Data Protection team by either emailing them at [dataprt@aviva.com](mailto:dataprt@aviva.com) or writing to the Data Protection Officer, Level 5, Pitheavlis, Perth PH2 0NH.

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

## 4. RAC Privacy Notice Overview

### Data protection statement

This section provides a summary of how RAC uses your information. For full details about RAC's use of your data, please visit [rac.co.uk/pdfs/businessroadside/breakdown/privacypolicy](https://rac.co.uk/pdfs/businessroadside/breakdown/privacypolicy).

You can contact the Data Protection Officer for RAC by emailing [dpo@rac.co.uk](mailto:dpo@rac.co.uk) or writing to Data Protection Officer, RAC Great Park Road, Bradley Stoke, Bristol BS32 4QN.

### What data will RAC use?

There are three types of information about you which RAC will use to provide your Motor Breakdown:

1. Personal data: Information which potentially identifies you. This includes your name, address, email address, telephone number and date of birth.
2. Non-personal data: Information about you that is not personal such as information about your vehicle.
3. Special category data: In very limited circumstances, RAC will collect special category data such as information relating to your health. RAC will only ask for this information when necessary and in accordance with data protection laws.

### How RAC collects your data

RAC obtains your data from you when you contact them directly. RAC also obtains your data from HSBC when you purchase this Motor Breakdown and/or if you report a new claim to HSBC in relation to this RAC Breakdown Cover.

### How RAC uses your data

RAC will use your data for the administration of your Motor Breakdown such as when you require assistance. RAC also monitors and records any communications with you including telephone conversations and emails for quality and compliance reasons.

RAC may disclose your personal data to third parties involved in providing products and services or to service providers who perform services on their behalf.

### Your rights

You have a number of rights relating to your personal data. For information about your rights you can visit [rac.co.uk/pdfs/businessroadside/breakdown/privacypolicy](https://rac.co.uk/pdfs/businessroadside/breakdown/privacypolicy), contact RAC's Data Protection Officer or contact their Customer Service Team by:

1. Telephone: 0330 159 0337
2. Email: [membershipcustomercare@rac.co.uk](mailto:membershipcustomercare@rac.co.uk)
3. Post: RAC Motoring Services, Great Park Road, Bradley Stoke, Bristol BS32 4QN.

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