

# Privacy Notice

## HSBC Privacy Overview

HSBC's Privacy Notice explains how HSBC collects, uses, discloses, transfers, and stores your information, and sets out your rights in relation to your information. A copy of HSBC's Privacy Notice is available separately and HSBC will inform you when any changes are made to it. You can find an overview in your HSBC Insurance Aspects Terms and Conditions, or the full Privacy Notice copy at [hsbc.co.uk](https://www.hsbc.co.uk) or you can ask for a copy in branch or by telephone.

## Aviva Privacy Notice

Aviva Insurance Limited (Aviva) is the insurer of HSBC Aspects Mobile Phone insurance. Aviva collects and uses personal information about you so that they can provide you with a policy that suits your insurance needs. Some of this information may be collected directly from you and some may be collected from other sources including HSBC, for example, during the sale of the policy. Aviva is the data controller in respect of your personal information that it has received from HSBC, as distributor, and also in respect of any information that it has collected directly from you or from other sources as set out in its full privacy policy at [aviva.co.uk/privacypolicy](https://www.aviva.co.uk/privacypolicy). Additional controllers include any applicable insurers, reinsurers and brokers we use.

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

## Personal information Aviva collects and how we will use it

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

- to provide you with insurance: to administer your policy and handle any claims;
- to support legitimate interests that we have as a business. We need this to:
  - manage arrangements we have with our insurers, reinsurers and brokers we use, and for the detection and prevention of fraud,
  - help us better understand our customers and improve our customer engagement. This includes profiling and customer analytics which allows us to make certain predictions and assumptions about your interests, make correlations about our customers to improve our products and to suggest other products which may be relevant or of interest to customers;
- to meet any applicable legal or regulatory 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 any joint HSBC Insurance Aspects holders. **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 and date of birth, financial information and details of your mobile phone. If a claim is made we will also collect personal information about the claim from you and any relevant third parties.

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 may be provided to us by a third party including HSBC. This may include information already held about you and your mobile phone within 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.

## How we share your personal information with others

We may share your personal information:

- with the Aviva group, our agents and third parties who provide services to us, HSBC and other insurers (either directly or via those acting for the insurer such as loss adjusters or investigators) to help us administer our 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, for example the IMEI Blacklist following a successful claim for the theft or loss of the insured device; and
- with reinsurers who provide reinsurance services to Aviva and for each other in respect of risks underwritten by Aviva, with insurers who cover Aviva under its group insurance policies and with our brokers who arrange and manage such reinsurance and insurance arrangements. They will use your data to decide whether to provide reinsurance and insurance cover, arrange and manage such cover, assess and deal with reinsurance and insurance claims under such cover and to meet legal obligations. They will keep your data for the period necessary for these purposes and may need to disclose it to other companies within their group, their agents and third party service providers, law enforcement and regulatory bodies.

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

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

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

#### **Contacting us**

If you have any questions about how we use personal information, or if you want to exercise your rights stated above, please contact our Data Protection 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 Commissioner’s Office at any time.