



Aviva Drive App V2.0 Privacy Policy

Introduction

Welcome to the Aviva Drive App (“App”) privacy policy.

Aviva respects your privacy and is committed to protecting your personal data. This privacy policy aims to give you information on how Aviva collects and processes your personal data through your use of the App, including any data you may provide through the App when you use some of its functionality.

This privacy policy should also be read in conjunction with the App Terms of Use above and is supplementary to the Aviva Group Companies privacy policy which contains additional details about our collection and use of your personal data, as well as your rights in relation to data we hold about you. You can find it [here](#).

The App is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions in the App when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

1. Who We Are

Your access to the App is facilitated by Aviva UK Digital Limited (“Aviva”, “we”, “us” or “our”). We are part of the Aviva group of companies. Any information that personally identifies you is collected by us as data controller for the purposes of the Data Protection Laws.

Wherever the term “Aviva Group Companies” is used within these pages this refers to one or more of the trading companies of Aviva that operate in the United Kingdom and who may or may not offer insurance and financial products or services in relation to the App.

For more information concerning Aviva visit www.aviva.com

For full list of Aviva Group Companies visit www.aviva.co.uk

2. The Data We Collect About You

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, title, date of birth, vehicle registration number and claim reference number. We may also incidentally process Identity Data in relation to your passengers if: (1) such data is captured by your device’s camera and/or microphone when using the dashcam feature of the App; and (2) the dashcam footage is submitted to us by you as part of a claim, as further described below.
- **Contact Data** includes email address, telephone numbers, address and postcode.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the App. This includes the journey data, driving data and location data of individual journeys you track on the App, as further described below.
- **Profile Data** includes your username or similar identifier and password (which may be your MyAviva username and password if you are registered for MyAviva and wish to use those login details).
- **Usage Data** includes information about how you use the App and other Aviva products and services, as well as device type, the amount of time you use the App and your use of the App’s features.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may inadvertently receive **Special Categories of Personal Data** about you or your passengers (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health). We will only have access to Special Categories of Personal Data if: (1) such data is captured by your device's camera and/or microphone when using the dashcam feature of the App; and (2) the dashcam footage is submitted to us by you as part of a claim, as further described below. **Such access to these Special Categories of Personal Data is incidental to you submitting dashcam footage in support of a claim and we will not be actively processing this data for any reason.**

We may collect, use and share anonymous **Aggregated Data** such as statistical or demographic data to support the development and improvement of the App and other services provided by Aviva... For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

If you Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with use of and access to the App). In this case, we may have to withdraw your access to the App but we will notify you if this is the case at the time.

3. How is Your Personal Data Collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact Data and Marketing and Communications Data by completing text fields on the App or submitting dashcam footage). This includes personal data you provide when you:
 - register for the App or submit login details on the App if you are already registered with MyAviva;
 - submit data to allow us to give you a driver score and discounted insurance quotation;
 - obtain a quotation for and/or purchase our products or services;
 - make a claim following an accident;
 - submit video and/or audio footage to us for the purpose of making a claim (as further described below);
 - request marketing to be sent to you;
 - give us some feedback.

Automated Technologies or Interactions

As you interact with the App, we may automatically collect Profile Data, Usage Data and Technical Data. We collect this personal data by using cookies, server logs, diagnostic information, communications logs and other similar technologies.

We will only process your location data where we have your explicit consent to do so. You will also have the option via your device's settings to withdraw such consent at any time. If you do not give your consent for us to track your data you will not be able to use the App.

Dashcam Feature

In addition to above information regarding direct interactions and automated technologies or interactions, below is further information about how and when your personal data including Identity Data, Contact Data, Technical Data and Special Categories of Personal Data (and that of your passengers) is collected when using the dashcam feature of the App:

- The dashcam feature will access your device camera to record audio and video, replicating the function of a wired dashboard camera.
- You have the control to switch on or switch off the dashcam feature of the App. You will be able to use App without using the dashcam feature, and to use dashcam feature without giving access to your device's microphone.
- Further you can terminate any video or audio recording at any time through the functionality in the App.

Where the App's dashcam is active during each journey, it does not retain footage in its entirety. Retaining footage only occurs either when you manually choose to save a clip, or automatically if a collision is detected (see the Collision Detection section below). This footage will be saved on your device and not shared with Aviva unless you submit it yourself.

- **Sensors and GPS.** Whilst the App and your device are running it accesses the sensors on your device to record location information, direction and speed in order to track your journeys. Your location will be tracked via GPS when a clip is saved. GPS tracking is constant and sent to us automatically. **As mentioned at above, when using the App, you will be required to provide explicit consent before we can track your location. You will also have the option via your device's settings to withdraw such consent at any time.**

- When you elect to switch on the camera features of the App, the App will capture the video footage of your journey. You acknowledge and agree that such footage may inadvertently capture:
 - Special Categories of Personal Data about you, for example, sound or images which reveal your religious beliefs, racial or ethnic origin, political beliefs or sexual orientation;
 - pictures and conversations of your passengers including Special Categories of Personal Data of your passengers, for example, sound or images which reveal their religious beliefs, racial or ethnic origin, political beliefs or sexual orientation. **It is your responsibility to explain what information the App collects to any passengers in your vehicle and to get informed consent from them before using the App;** and
 - recordings of the commission of a crime (although this may not be evident at the time of recording as it may not be possible to determine whether an offence has been committed or not). In such cases it is your responsibility to comply with applicable law.

As set out above, we will only have access to Special Categories of Personal Data if: (1) such data is captured by your device’s camera and/or microphone when using the dashcam feature of the App; and (2) the dashcam footage is submitted to us by you as part of a claim, as further described below. Such access to these Special Categories of Personal Data is incidental to you submitting dashcam footage in support of a claim and we will not be actively processing this data for any reason.

- Collision detection: collision detection technology is embedded in the App. In the event of a collision being detected the App will automatically retain 30 seconds of video footage before the collision and a further 30 seconds thereafter (“**Collision Recording**”). Collision Recording is triggered when the device exceeds an undisclosed G-force threshold. The collision detection technology deploys an algorithm that uses sensory data from your device’s accelerometer, gyroscope and magnetometer to produce a reading of the collision.
- Sharing footage:
 - You may choose to share your dashcam footage in two ways.
 - The dashcam’s ‘share’ button provides native device sharing functionality that will allow the user to email their footage as an attachment, or send it via SMS as an attachment.
 - You have the option to ‘notify Aviva’ or capability to send dashcam footage to us at dashcam@aviva.com mailbox as an attachment by email. You are required to have reported a new claim and have a claims reference number before submitting footage. The claim reference number will be validated, ensuring it is the correct number of characters and follows the standard format. Data submitted to us via this mailbox will be subject to the virus scanning protocols. Video files will be compressed using a proprietary algorithm developed within the App and will be no larger than 30MB.
- In the case of sharing footage via email, the automatically populated email may contain:
 - Your email address;
 - Accident date;
 - Accident time;
 - Accident location;
 - Confirmation if data manually / automatically recorded;
 - Vehicle registration number;
 - Dashcam footage attachment;
 - Claim reference number.
- Upon receipt of the dashcam footage an automated response will be returned to the user, advising them that their footage will be processed. Aviva’s Motor Claims Innovation sub team will triage footage submitted to the mailbox and route it to the appropriate claims handler for processing. Correspondence not related to dashcam footage submission will not be processed.

All video data recorded by the dashcam will be stored locally on your device. No dashcam footage will be sent to us from the App automatically. **In relation to the processing of personal data by the dashcam which is stored on your device and not shared, you are the data controller.** You may choose to send us data recorded by the dashcam to support an insurance claim at your discretion. Non Aviva customers will have limited capability to share their dashcam footage clips as attachments via email.

Any data provided to Aviva will not affect your ability to make a claim on your policy.

4. Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us using the details below if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as an App user	(a) Identity (b) Contact (c) Profile	Performance of a contract with you
To provide you with an insurance quotation and related administration for offering renewal, pricing and statistical purposes and crime prevention	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Explicit consent from you (where the processing involves your location data for the purposes of giving you a driver score and an insurance quotation as a result)
To deal with claims submitted by you	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (if applicable)	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and the App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant App content	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our App, to develop them, to grow our business and to inform our marketing strategy)

To provide software updates, App support and other services to you (if any) related to the App	(a) Technical (b) Usage	Performance of a contract with you
To use data analytics to improve the App, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep the App updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Aviva will not use (or seek to use) your data in any way other than in accordance with its usual claims handling policies and procedures where users choose to send footage to Aviva in support of an insurance claim. All META tag data will be automatically erased from any dashcam footage that is submitted by you.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To find out more about the ways we may use your personal data for marketing and advertising please see the Aviva Group Companies privacy policy found here or contact us using the details below. You can update your marketing preferences at any time, either using the tool available on MyAviva or by contacting us, using the contact details set out below.

Cookies

We use cookies or other similar technologies to capture your personal data, including your first name, last name, email address and password, to link the App with your MyAviva account and recognise within your MyAviva account that you are an App user. You have the ability to accept or decline cookies by modifying the settings of your web browser. If from time to time, you are required to agree to our use of cookies to collect this data or other data, we will provide you with the option on the App to opt in prior to our use of cookies in relation to you. Further details are available on our Aviva Cookies Policy (which also applies to the App) or for further information about how to disable cookies in your browser please visit the About Cookies Website at <http://www.allaboutcookies.org>.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If in the unlikely event we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Aviva Group Companies (including staff that administer and otherwise operate the App and our UK call centres within the Aviva Group Companies for the purpose of providing insurance quotations to you. We enable our Aviva Group Companies call centres employees to contact you by phone or e-mail for this purpose. They will discuss your quotation and the information that you submitted to us as part of the quotation procedure. We may also share your personal data with our UK call centres within the Aviva Group Companies for the purpose of responding to and handling any insurance claim you make).
- Third Parties as set out below:
 - Service providers acting as processors based within the UK who provide IT and system administration services;

- Law enforcement agencies, third party insurers, or solicitors (for example, if we believe in good faith that the disclosure is required by law or for the detection of crime or as part of a claim);
- Regulatory bodies for the purposes of monitoring and/or enforcing Aviva’s compliance with any regulatory rules/codes.

You can find more details of how we share your information with third parties in the Aviva Group Companies privacy policy found [here](#) or contact us using the details below.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data Security

No data transmission over the internet can be guaranteed to be totally secure, however. Although we take steps to secure the information you provide to us, we cannot guarantee the security of any information you transmit to us or that we retain. You use the App, and provide us with personal data, at your own risk.

You should note that the information that you submit to us for the above App related purposes is also stored on your device in unencrypted form and you agree that the onus is on you to password protect access to your device to ensure that your information stored on your device remains secure. Your communications may route through a number of countries before being delivered - this is the nature of the internet.

Aviva cannot accept responsibility for any unauthorised access or loss of personal data that is beyond our control, including access or loss caused by you failing to password protect access to your device.

For more information about the security measures we put in place to protect your personal data, please see the general Aviva Group Companies privacy policy found [here](#) or contact us using the details below.

7. Where Is Personal Data Stored?

All personal data you submit to or we collect via the App will be stored in Aviva Microsoft Azure database or Aviva’s internal systems.

You may delete the information stored locally by the App at any time by deleting the files from your device. Further you may request deletion of information you upload or share with us by contacting us using the details below.

8. Your Legal Rights

You have various rights in relation to your personal data, including the right to request access to your personal data, correct any mistakes on our records, erase or restrict records where they are no longer required, object to use of personal data 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 the general Aviva Group Companies privacy policy found [here](#) or contact us using the details below.

9. Contact Details

Our full details are: Aviva UK Digital Limited (company number 09766150), registered office: St Helen’s, 1 Undershaft, London EC3P 3DQ.

Team name: Data Protection Team

Email address: DATAPRT@aviva.com

Postal address: The Data Protection Team, Aviva, Pitheavlis, Perth, PH2 0NH

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Aviva UK Digital Limited is a company registered in England & Wales with company number 09766150 and a registered office at: St Helen’s, 1 Undershaft, London EC3P 3DQ.

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