

IMPORTANT INFORMATION

Privacy Notice

Personal Information

We collect and use personal information so that we can provide you with a policy that suits your insurance needs. This notice explains the most important aspects of how we use personal information. You can get more information about the terms we use, and view our full Privacy Policy at www.aviva.co.uk/privacypolicy, or request a copy by contacting us at Aviva, Freepost, Mailing Exclusion Team, Unit 5, Wanlip Road Ind Est, Syston, Leicester, LE7 1PD.

As the insurer of the product, Aviva Life & Pensions UK Limited is the data controller responsible for processing this personal information. Any applicable reinsurers are additional controllers, along with Santander Insurance Services UK Limited who are responsible for the sale and distribution of the product.

Personal information we collect and how we use it

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

- provide you with insurance. We need this to:
 - decide if we can offer you insurance and, if yes, on what terms,
 - administer your policy,
 - handle any claims,
 - manage any renewal.
- support legitimate interests that we have as a business. We need this to:
 - manage arrangements we have with reinsurers,
 - 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, which includes marketing products and services to you.
- meet any applicable legal or regulatory obligations. We need this to:
 - meet compliance requirements with our regulators (eg the Financial Conduct Authority),
 - comply with law enforcement,
 - manage legal claims.
- carry out other activities that are in the public interest, e.g. we may need to use personal information to carry out anti-money laundering checks.

We may also use personal information about other people. This may include, for example, other people whose lives will be insured under the policy; the family or personal history of the insured, or appointed trustees where policies are placed under trust.

If you're 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, occupation, lifestyle, current state of health and any existing conditions of each person insured. If a claim is made we'll also collect personal information about the claim from you and any relevant third parties. We recognise information about health is particularly sensitive information.

We'll ensure that we will 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'll 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 at dataprt@aviva.com. Please note that if consent to use this information is withdrawn, we'll not be able to continue to process the information you gave us for this/these purpose(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 the Aviva group, including details from previous quotes and claims, information we obtain from publicly available records, our trusted third parties, medical records and from industry databases, including fraud prevention agencies and databases.

Automated decision making

We carry out automated decision making to decide whether we can provide insurance to you and on what terms. In particular, we use an automated underwriting engine to process the personal and medical information you provide as part of this application process (including your age, whether you smoke, your answers to our health and lifestyle questions, including your family medical history), along with the amount of cover you wish to obtain. We do this to calculate how much that cover will cost you. Without this information we are unable to provide a price that is relevant to your individual circumstances and needs. In some scenarios, we may also use an automated underwriting engine to process medical information provided as part of our process for sampling policies after they've been taken out. We do this to check that the price of your cover and terms of your policy are correct and if you are selected for this process, we will contact you to make this clear to you. We regularly check the way our underwriting engines work to ensure we're being fair to our customers. After the automatic decision has been made, you have the right to speak to someone from Aviva, who may review the decision and provide a more detailed explanation. If you wish to invoke this right please contact us at SECUNNO@aviva.com.

How and when we share your information with others?

We may share personal information with:

- the Aviva group, our agents and third parties who provide services to us, to help us administer our products and services,
- 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,
- other organisations including insurers, public bodies and the police (either directly or using shared databases) for fraud prevention and detection purposes,
- reinsurers who provide reinsurance services to Aviva and for each other. Reinsurers will use your data to decide whether to provide reinsurance cover, assess and deal with reinsurance claims and to meet legal obligations. They'll keep your data for the period necessary for these purposes. We 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 do we keep your personal information for?

We maintain a retention policy to ensure we keep personal information for as long as we reasonably need it, for the purposes explained in this notice. We'll need the data for the period necessary to administer your insurance and deal with claims and queries on your policy. We may 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 our use of personal information based on legitimate business interests, including for profiling and marketing, asking 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 email us at dataprt@aviva.com.

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 Officer by either emailing them at dataprt@aviva.com or writing to them at, Data Protection Officer, Level 4, 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'll 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.

Aviva Life & Pensions UK Limited.

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