



Notice to Policyholder How we use your personal information

Dear Policyholder,

This document explains how we collect, use and store your personal information. This includes any personal information given to us about other people named on the policy, quote or claim.

This document replaces any details relating to how we handle your personal information contained in the 'useful and important information' section of your Document of Insurance.

We want you to be confident about how we use your personal information. As a regulated company and information controller we take our responsibilities for the security and management of your personal information seriously. That's why we invest in our systems and processes to ensure that the way we collect, use, share, and store your information meets both the regulatory and our own high standards.

The details in this document reflect changes in legislation which mean you have a right to be informed on how we use your personal data.

Who we are and how to contact us

Liverpool Victoria Insurance Company Limited is the controller of your personal information and is part of the LV= group of companies. For more information visit LV.com/terms/lv-companies.

If you have any questions about how we process your personal information please get in touch with us at: GI Customer Support, LV=, County Gates, Bournemouth, BH1 2NF or email us at: GICustomerSupport@LV.com.

You can also contact our Data Protection Officer: Data Protection Officer, LV= County Gates, Bournemouth, BH1 2NF or via email at dpo@LV.com.

Information we collect

We only ask for information that we need, and have strict controls to keep it safe. We collect your personal information to provide our products and services (eg handling your claims) to you. Without the information we ask for, we can't give you a quote or insurance policy and it may affect the outcome of any claims you make.

Personal information we collect will be held in digital and / or paper files. We collect personal information such as name, address, date of birth, criminal convictions, health, and claims history. We'll also collect information which relates to the things you want to insure (for example your house or vehicles).

We collect personal information about everybody named on your policy, quote, incident or claim when you:

- ask for a quote or apply for a policy
- buy and / or use a product or service
- ask us a question
- make, or inform us of a claim or incident
- update your personal details
- change your cover
- register a complaint
- take part in market research (eg customer satisfaction surveys)

How we use and share your personal information

The personal information we ask for will be used by us and third parties who process information on our behalf. This includes organisations who administer your policy, service your claims and reinsurers.



Legal grounds for processing personal information

We collect your personal information to provide our quotes, products and services to you.

As a regulated financial services organisation we're required to comply with legal and regulatory obligations such as the prevention, detection and reporting of fraud and other financial crime.

We'll process personal information for our legitimate interests, when we have a business reason to do so, to:

- develop, improve, and personalise our products, pricing and services
- enhance our customer service, experience, and relationship (eg customer and market research, business analysis, provide relevant product and service information)
- help detect and prevent fraud and financial crime
- develop and improve our administration, security systems and insurance applications
- share it with third parties in the event of organisational change (eg if we bought or merged with another organisation)
- share personal information with other LV= companies

If we need your consent to process personal information we'll ask for this first. You can withdraw your consent at any time.

We'll ask for your consent (or next of kin's), to obtain any medical / health information we need. In an emergency we'll manage claims until you or someone else is able to act on your behalf.

Automated decision making and profiling

We use automated decision making to help determine the prices, policy terms, relevant products / services, when you research or ask for a quote, buy insurance, make any changes, renew or make a claim. We may also profile you based on your personal information and that provided by third parties. Profiling may be used to help determine the likelihood of a claim or policy transaction being fraudulent.

Profiling will also be used to enhance our understanding of you and to inform our business decisions (eg product design, pricing, customer journeys or marketing strategy).

Please see the personal information rights section below.

International transfers

In the event that we process personal information outside the UK, the processing in those locations is protected by UK and European data standards.

Where your claim occurs abroad we will also send data to the necessary service providers and agencies as required to service your claim.

Financial crime & fraud prevention agencies

The personal information we have collected will be shared with crime prevention agencies who will use it to prevent financial crime and fraud and to verify your identity. If financial crime or fraud is detected, you could be refused certain services, finance or employment. Where we suspect financial crime or fraud, we may cancel any policies you have with us, not be able to pay any claim or offer you the requested product or service. We may share relevant information with crime and fraud prevention agencies, law enforcement agencies and other relevant organisations.

Regulatory bodies

Your personal information will be used or disclosed as required to regulators to monitor and enforce our compliance with any regulation.

Claims and Underwriting Exchange and other databases

You must tell us about any claim or accident, even if it wasn't your fault. We'll share this information and your personal details with databases such as the Claims and Underwriting Exchange (CUE). We may search these databases when you apply for insurance, make a claim or renew your policy, to validate your claims history (or that of any other person or property likely to be involved in the insurance or claim).



Credit search and identity check

In order to process your application we'll supply your personal information to credit reference agencies (CRAs) and they'll give us information about you, such as about your financial history. We do this to assess creditworthiness, check your identity, manage your account, trace and recover debts and prevent fraud and other financial crime.

We'll also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your personal information with other organisations. Your data will also be linked to the data of any joint applicants or other financial associates you have.

The identities of the CRAs and the ways in which they use and share personal information are explained in more detail at experian.co.uk/crain, callcredit.co.uk/crain and equifax.co.uk/crain.

Brokers

If we get your details from an insurance broker, your personal information (eg policy details, claims, payment, suspected fraud and other financial crime information) will be shared with them.

Incidents or claims

When you tell us about an incident or claim we'll share this with relevant agencies and appropriate service providers. We'll also collect information from anyone else involved as necessary, eg claimant, witnesses or police.

Public information

We may use public information (such as electoral roll, county court judgements, vehicle taxation status, MOT status, bankruptcy or repossessions).

Industry databases

We'll check and exchange information with industry databases, such as:

- credit reference company data (eg credit scores)
- geographical (eg flood scores, information about a location)
- demographics (eg modelled data on household incomes, credit reference agency scores)
- insurance and claims history (eg previous claims, No Claim Discount)
- information about what you want to insure or make a claim for (eg vehicle repair history, vehicle finance data, property information, building council tax band)
- financial crime and fraud prevention databases (also refer to financial crime and fraud prevention agencies section)
- claims compensation and recovery databases (eg reimbursement of NHS costs resulting from an accident)

Specialist services we use

We use other companies to provide some services, eg banks and building societies, breakdown and recovery agents, claims adjusters, claims suppliers, legal service providers, communication services, debt recovery agencies, marketing, fraud and other financial crime investigation services etc. They'll be given the personal information they (or their sub-contractors) need to manage their service.

Market research agencies

We may share your personal information with market research agencies who will conduct market research and business analysis on our behalf.



Employers Liability Tracing Office (ELTO)

In accordance with the Employers Liability Insurance: Disclosure by Insurers Instrument 2010 made by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA) we will be required to provide some of your personal information to the Employers Liability Tracing Office (ELTO).

The information that we supply in accordance with this requirement will be added to an electronic database that will be managed by the Employers Liability Tracing Office (ELTO), it will be subject to periodic update and certification and will be audited annually.

Access to the database and the information stored on it will assist claimants, their appointed representatives, employers' liability insurers and other persons or entities with legal access to the information to:

- identify which insurer (or insurers) provided employers' liability insurance during the relevant period(s) of employment; and
- identify the relevant employers' liability insurance policies

The information supplied to the Employers Liability Tracing Office will include:

- policy number(s)
- employers' previous and current names and addresses (including subsidiary companies)
- cover dates
- Companies House reference numbers (where relevant)
- Her Majesty's Revenue and Customs Employers reference numbers

Reinsurers and reinsurance brokers

We may need to share any personal information, including policy, claims, medical, and suspected fraud and other financial crime information, with our reinsurers and reinsurance brokers. Reinsurers provide insurance policies to insurance companies. Insurance companies engage a reinsurance broker to advise and assist in arranging a re-insurance policy.

Other insurers

When necessary we share your personal information with other insurers if you make a claim, to verify that the information you've provided is correct and prevent financial crime and fraud. If you move to a new insurer we may confirm certain details about your insurance to them. We'll only do this if we're sure it's a genuine request.

Medical and other health services

If you make a claim and give us your consent, we'll get your medical information from the relevant health provider, eg doctor or hospital.

Claimants

We may be given information by a claimant or their representative, a witness or family member, to support a claim or to pursue a claim against your policy.

Other insured parties

An insured party on your policy (eg named driver) may notify us of an incident or claim against your policy.

Law enforcement and government agencies

Information may be given to us by law enforcement agencies (eg the police) about an incident which may result in a claim or may affect a policy or ongoing claim.

Communications

When you contact us, personal information that you give us will be recorded. This helps us improve our customer service, train our staff, respond to complaints and prevent fraud and other financial crime.

All communications will be in English. You can get this document from us in Braille, large print or audiotape by contacting us.



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How long we keep your personal information

If you buy a policy from us we'll keep all personal information for 7 years after the policy ends to ensure we meet our statutory and regulatory obligations (eg as laid down by the HMRC, MIB), and to allow us to manage complaints or claims.

After 7 years, we'll only keep the personal information we need so that we can identify who was covered for 40 years after the policy ends.

In exceptional cases we may need to keep claim information for longer than 40 years (eg where serious injury has occurred and there is potential need to provide life-long care to an injured person).

We'll keep your quote for up to 3 years.

Your personal information rights

You have a right in certain circumstances to:

- *access* the personal information we hold about you
- *correct* personal information
- have your personal information *deleted*
- *restrict* us processing your personal information
- receive your personal information in a *portable* format, and
- *object* to us processing your personal information

You can also ask for a person to *review* an automated decision.

If you want to find out more or to exercise these rights please contact us: GI Customer Support, LV=, County Gates, Bournemouth, BH1 2NF or email us at GICustomerSupport@LV.com.

Your right to make a complaint

If you have a complaint about the way we process your personal data please contact us.

You can also raise your complaint with the Information Commissioner's Office on 0303 123 1113 or visit ico.org.uk/concerns.