

# Privacy policy

## How we use personal information

This document explains how we collect, use and store personal information. We want you to be confident about how we use personal information. As a regulated company and data controller, we take the responsibilities for the security and management of personal information seriously. That's why we invest in our systems and processes to ensure that the way we collect, use, share, and store the information meets both the regulatory and our own high standards. When we talk about policy, this could include any subscriptions you have with LV=.

## Who we are and how to contact us

Liverpool Victoria Insurance Company Limited is the data controller of any personal information given to us about you or other people named on the policy, quote or claim. It is your responsibility to let any named person know about who we are and how this information will be processed.

Liverpool Victoria Insurance Company Limited is part of Liverpool Victoria General Insurance Group (LVGIG), and LVGIG is part of the Allianz Group. More information can be found at [www.lv.com/insurance/terms/lv-companies](http://www.lv.com/insurance/terms/lv-companies).

If you have any questions about how we process personal information, please get in touch with us by writing to: GI Customer Support, LV=, County Gates, Bournemouth, BH1 2NF or email us at [GICustomerSupport@LV.co.uk](mailto:GICustomerSupport@LV.co.uk)

You can also contact our Data Protection Officer: Data Protection Officer, 57 Ladymead, Guildford, Surrey, GU1 1DB, or via email at [GIdataprotection@LV.co.uk](mailto:GIdataprotection@LV.co.uk)

## Personal information rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

You have the right to:

- access the personal information we hold about you, or anyone on the policy
- correct personal information you think is inaccurate or to update information you think is incomplete
- have personal information deleted in certain circumstances
- restrict us processing personal information, under certain circumstances
- receive personal information in a portable format. This only applies to information you have provided to us
- object to us processing personal information, under certain circumstances

You can also ask us 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.co.uk](mailto:GICustomerSupport@LV.co.uk)

## How we collect, use and share personal information

We only collect information that we need, and have strict controls to keep it safe. We collect personal information to provide our products and services (e.g. handling claims) to you. Without the information we collect, we can't give you a quote or an 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, claims history, IP addresses and information about the technology you're using. We'll also collect information which relates to the things you want to insure (for example your house or vehicles).

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

- ask for a quote or apply for a policy and when we prepare your renewal quote
- buy and/or use a product or service
- ask us a question
- make, inform us of, or we investigate a claim or incident, including anyone associated with that incident.
- make a payment
- update personal details
- change cover
- register a complaint
- take part in market research (e.g. customer satisfaction surveys)
- update marketing preferences

The personal information we collect 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.

We don't sell your data to anyone.

## Legal grounds for processing personal information

We collect 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. This includes but is not limited to:

- developing, improving, and personalising our products, pricing and services
- enhancing our customer service, experience, and relationship (e.g. customer and market research, business analysis, providing relevant product and service information)
- improving the relevance of our advertising and marketing campaigns
- helping to detect and prevent fraud and financial crime
- developing and improving our administration, security systems and insurance applications
- promoting responsible lending and helping to prevent over-indebtedness
- sharing it with third parties in the event of organisational change (e.g. if we bought or merged with another organisation)
- sharing personal information with other LV= companies and the Allianz Group

If we need consent to process personal information, we'll ask for this first. This consent can be withdrawn at any time.

We'll ask for consent (or next of kin's), to obtain any medical/health information we need. In an emergency, we'll manage claims as appropriate, until we're able to get consent.

## Payment card details

We use a secure payment processor for all card payments. When a payment is processed, we share with the processor the details of the payer, such as the cardholder name and billing address. We also share with them contact details provided by yourself so that your bank can authenticate the transaction and help protect you against fraud. In response, we receive a unique transaction code and an extract of your card number, which we store as a record of the transaction.

You can choose to renew your insurance automatically using these card details – just let us know when you buy your policy. You can change this at any time.

You can also choose to use these card details again, if you make any changes to the policy.

## 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 personal information 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 (e.g. product design, pricing, customer journeys or marketing strategy). If you've chosen to receive marketing information from us, profiling will be used to make our marketing more relevant, e.g. personalise the channels used to market to you, the marketing messages used and the offers you're sent.

## Multiple policies at the same address

We may provide a discount if there is more than one policy at the same address. This could result in anyone at the address who has a policy or quote with us being made aware that someone else living at the address also has insurance with us.

## 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.

If the information you provide to us is transferred to countries outside the European Economic Area (EEA), by us or our suppliers, steps will be taken to ensure that appropriate security measures are in place with the aim of ensuring that your privacy rights continue to be protected.

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

## The Industry Databases and Institutions we check and exchange information with

### Financial crime & fraud prevention agencies

The personal information, about any customer or third party or representative, we have collected will be shared with crime and fraud prevention agencies, including their members, law enforcement and other relevant organisations. LV= and these organisations 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 may have with us, retain any premiums paid, be unable to pay any claim or offer you the requested product or service.

## Regulatory bodies

Personal information will be used or disclosed as required to regulators, for example Financial Conduct Authority (FCA), The Prudential Regulation Authority (PRA), Information Commissioner's Office (ICO) and Financial Ombudsman Service (FOS), to monitor and enforce our compliance with any regulation.

## Claims and Underwriting Exchange and other databases

You must tell us about any claim or incident, even if it wasn't your fault. We'll search databases such as the Claims and Underwriting Exchange (CUE) when you apply for insurance, make a claim or renew your policy, to validate your no claim discount and claims history (or that of any other person or property likely to be involved in the insurance or claim).

We'll share personal information such as claim or incident details including dates, costs, fault status, any impact to no claim discount and if any personal injury has occurred. The table below details the ways in which we share personal information for the policyholder and/or other people named on the policy, quote or involved in any claim

<b>Policyholder</b> The person on the documents named as the Policyholder	<ul style="list-style-type: none"><li>• Any credit agreements they enter into</li><li>• Any fraud or financial crime detected</li><li>• No Claim Discount (NCD) entitlement</li><li>• Claims, incidents or accidents</li></ul>
<b>NCD Holder</b> (for motor insurance only) The person who has earned the NCD	<ul style="list-style-type: none"><li>• No Claim Discount (NCD) entitlement</li><li>• Claims, incidents or accidents against any vehicle(s) they're the NCD Holder of</li><li>• Any fraud or financial crime detected</li></ul>
<b>Anyone named on the policy or any other third party.</b>	<ul style="list-style-type: none"><li>• Claims, incidents, for motor insurance, accidents where they're in control of the vehicle or as a passenger</li><li>• Any fraud or financial crime detected</li><li>• Witness to an incident</li></ul>

## Incidents or claims

When we are notified of an incident or claim, we'll share this with relevant agencies and appropriate service providers. We'll keep this information updated as the claim progresses and is settled. This includes details of any persons involved in the incident or claim and details of the policyholders and/or the NCD holder attached to the policy.

We'll also collect information, including CCTV, dashcam footage or images where relevant, from anyone, e.g. claimant, witnesses or police. We may also use data from your car/car manufacturer.

## Brokers

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

## Credit reference agencies (CRA)

In order to process your application, renewal or claim, we'll supply personal information about you or anyone on the policy to credit reference agencies (CRAs) and they'll give us information, such as financial history. We do this to assess creditworthiness and affordability, check identity, make pricing and underwriting decisions, manage policies, trace and recover debts and prevent fraud and other financial crime.

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

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](https://experian.co.uk/crain), [www.transunion.co.uk/crain](https://www.transunion.co.uk/crain) and [equifax.co.uk/crain](https://equifax.co.uk/crain).

## Partner or affinity associations

If you get a quote or buy through one of our partner or affinity associations, we may pass some of the personal information back to them (e.g. policy details, claims, membership and suspected or proven fraud and other financial crime information).

## Price comparison or other introductory services

If you request a quote on a price comparison website or other introductory service, the information you give them is passed to us. We'll also pass personal information (e.g. policy details, and suspected or proven fraud and other financial crime information) back to them.

## Public information

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

## Marketing

We'll only send you marketing information about our products and services if you've given us permission. You can withdraw your consent at any time.

We may use your home address, phone numbers and email address to contact you according to your marketing preferences.

You can opt out of any marketing by giving us a call using the number shown in your documents.

## Social media and information published about you

We may use published information, including social media, for prevention and detection of fraud.

## Specialist services we use

We use other companies to provide some services, e.g. banks and building societies, breakdown and recovery agents, claim adjusters, claim suppliers, legal service providers, communication services, debt recovery agencies, marketing agencies, 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 personal information with market research agencies who will conduct market research and business analysis on our behalf.

## Reinsurers and reinsurance brokers

Reinsurers provide insurance policies to insurance companies. Insurance companies engage a reinsurance broker to advise and assist in arranging a reinsurance policy. 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.

## Other insurers

We share and collect 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.

## DVLA

If you give us a driving licence number when requesting a motor insurance quote, to add a new driver or preparing a renewal quote, we'll pass it to the DVLA MyLicence service to verify the status of the licence and entitlement. We'll then get any relevant restriction information, endorsements and/or conviction data.

We may also liaise with the DVLA to establish the keeper of the vehicle, to support us in any claim or policy investigation.

We will retain any images you send us of your driving licence, for the purposes of processing your quotation and administering your policy.

## Motor Insurance Database

We'll add details about your insurance policy to the Motor Insurance Database (MID), which is managed by the Motor Insurers' Bureau (MIB). The MID and the data stored on it may be used by the Police, the DVLA, the DVANI, the Insurance Fraud Bureau and other bodies permitted by law for purposes not limited to but including:

- electronic licensing
- continuous insurance enforcement
- law enforcement (prevention, detection, apprehension and/or prosecution of offenders)
- the provisions of government services and/or other services aimed at reducing uninsured driving

If you're involved in a road traffic accident (either in the UK or abroad), insurers and/or the MIB may search the MID to obtain relevant information. Other persons (including their appointed representatives) pursuing a claim in respect of a road traffic accident (including foreign citizens) may also obtain relevant information held on the MID.

It's important that the MID holds your correct registration number. If it doesn't, you risk the police seizing your vehicle. You can check that your registration number is shown on the MID at [askmid.com](https://askmid.com)

## Flood Re

The Flood Re scheme helps homeowners get insurance in flood risk areas. If your property is eligible, we'll send your property details to the scheme.

## Medical and other health services

If you make a claim and give us consent, we'll get medical information from the relevant health provider, e.g. doctor or hospital. In an emergency we'll manage claims as appropriate, until we are able to get consent

## Veterinary and other animal health services

If you make a claim and give us your consent, we may choose to get medical information on your pet from the relevant animal healthcare provider.

## Claimants

We collect and use information about claimants (including children under the age of 18) and witnesses, in order to process or pursue a claim.

## Other insured parties

An insured party on your policy (e.g. a 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 (e.g. the police) about an incident, which may result in a claim or may affect a policy or ongoing claim.

## Giving someone permission to talk to us about your policy

We can only talk about the policy to you or someone we're satisfied that you've authorised to talk to us, on your behalf, after we have carried out data security checks.

## Communications

When you contact us, personal information that you give us will be recorded and stored on our systems. All calls and web chats are 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 documents from us in writing, Braille, large print or audiotape by contacting us.

## Cookies

We use cookies to enhance your online experience and help us understand how our website can be improved. We don't store any contact details or banking information and we'll only remember your last visit. If you want to find out more or stop us from using cookies, please see our cookie policy on our website for more information.

## Other information we use

We use the following to provide a quote and to administer any policy or claim.

- Geographical (e.g. flood scores, information about a location)
- Demographics (e.g. modelled data on household incomes, credit reference agency scores)
- Information about what you want to insure or make a claim for (e.g. vehicle repair history, vehicle finance data, property information, building council tax band)
- Payment validation (e.g. the registered address of the card)
- Claims compensation and recovery databases (e.g. reimbursement of NHS costs resulting from an accident)
- Geo location data (e.g. information that can be used to find an electronic devices location)
- Device recognition ( e.g. the device you have been using to access LV=)
- ANPR (automated number plate recognition) (e.g. to identify the movements or whereabouts of a vehicle)

## 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 (e.g. as laid down by FCA, Money Laundering regulations, the HMRC, MIB and other regulatory bodies), and to allow us to manage complaints, claims and prevent fraud or financial crime .

From 7 years and up to 40 years after the policy ended, we'll keep the personal information we need for analysis purposes (e.g. risk and business modelling such as for pricing) and so that we can identify who and what was covered by the policy. Beyond 40 years, we'll keep information we need for longer term analysis (e.g. weather event modelling).

In exceptional cases, we may need to keep claim information for longer than 40 years (e.g. where serious injury has occurred and there is potential need to provide life-long care to an injured person or when requested by a court of law).

Where remediation work for a claim is backed by long-term guarantees (e.g. flood, subsidence claims), we'll keep claim information for at least the period of the guarantee (up to 10 years).

If you request a quote from us, we'll keep your details for up to 3 years.

## Right to make a complaint

If you have any questions or concerns about the way we process personal data please contact us at [Gldataprotection@LV.co.uk](mailto:Gldataprotection@LV.co.uk)

If you're not satisfied with the outcome of your query, you can contact the Information Commissioner's Office on 0303 123 1113 or visit [ico.org.uk/concerns](http://ico.org.uk/concerns).

## Changes

We may change this information from time to time. Any changes will be made available on our website.

