

# **first direct Life Insurance Privacy Notice overviews**

**first direct**

# An overview of how we collect and use your information (Privacy Notice overviews)

The data controllers responsible for the personal information in this notice:

- HSBC Life (UK) Limited, is the insurer of your life insurance product and collects and uses personal information about you so 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 **first direct** and HSBC UK Bank plc, for, example, during the sale of the policy. HSBC Life (UK) Limited is the data controller in respect of the personal information it receives from **first direct**/HSBC UK Bank plc as distributor and promoter of the your insurance product, and also in respect of any information that it has collected directly from you or from other sources as set out in its Privacy Notice.
- **first direct**, a division of HSBC UK Bank Plc, is responsible for promotion and distribution of your insurance product. We will collect and use your personal information during the promotion and sale of the product. This information may be provided by you but could also include information that we have previously collected about you, e.g. any information held about you as a banking customer. HSBC UK Bank Plc is the data controller for this information which will be shared with HSBC Life (UK) Limited as set out in its Privacy Notice.

## **first direct Privacy Notice overview**

**first direct** and HSBC UK Bank Plc will share your personal information with HSBC Life (UK) Limited to enable HSBC Life (UK) Limited to provide you with a quote, administer your policy and manage claims. If you make a claim, any information you give to us, or to HSBC Life (UK) Limited may be put in a register of claims database and it may be shared with other insurers to prevent fraudulent claims.

This provides an overview of:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure.

We'll also explain your rights to your information. This is just an overview of some key points. A full description is contained in the privacy notice which you can obtain by visiting **firstdirect.com/privacy** or if you prefer paper, give us a call on **03 456 100 100<sup>t</sup>** and we'll send you one in the post.

## **Who we are**

When we say 'we', we mean **first direct**, a division of HSBC UK Bank plc, which is part of the HSBC Group of Companies. HSBC UK Bank Plc, is the 'data controller' for your information and responsible for deciding how your information is used to promote and distribute the life insurance products.

## **The information we collect**

We collect information about you from different places including:

- directly from you
- from a third party acting on your behalf e.g. an intermediary or broker
- from other HSBC companies
- from publicly available sources
- when we generate it ourselves
- from other organisations.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past.

You're responsible for making sure you give us accurate and up to date information. If you provide information for another person on your policy, you'll need to, direct them to the privacy notice and make sure they agree to us using it for the purposes set out in the privacy notice.

## **How we'll use your information**

We'll use it to provide you with any products and services you've requested and other purposes including for example:

- to confirm your identity and address
- to understand how you use any other accounts, products or services you hold with us
- to carry out your instructions
- to improve our products and services
- to offer you other services we believe may benefit you unless you've asked us not to.

We'll only use your information where we're allowed to by law, including for example, carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

We may use automated systems to help us as carry out fraud and money laundering checks.

## **Who we can share your information with**

We may share your information with other companies we work in partnership with and other HSBC Group members. We may also share your information with others outside of the HSBC group including regulators (eg the Financial Conduct Authority), insurers, other banks, brokers, agents as well as credit reference and fraud prevention agencies.

## **Sensitive information**

When you apply for insurance, you may need to give us sensitive health information if the insurer needs this to give you a quote. We will keep this information secure and process it in accordance with relevant laws and regulations. Where appropriate, we will ask for consent to collect and use this information.

## **How long we'll keep your information**

We'll keep your information for as long as you have a relationship with us. After it ends we'll keep it where we may need it for our legitimate purposes, to help us respond to queries or complaints, or for other legal and regulatory reasons, including for example, fighting fraud and financial crime and responding to requests from regulators.

## **Transferring your information overseas**

Your information may be transferred and stored in countries outside the European Economic Area (EEA), including some that may not have laws offering the same level of protection for personal information. When we do this, we'll ensure an appropriate level of protection is maintained.

## **Your rights**

You have a number of rights relating to your information eg to see what we hold, to ask us to share it with another party, ask us to update incorrect or incomplete details, to object to or restrict processing of it etc.

For a fuller statement of your rights and how to complain if you're unhappy with anything you think we are doing, please see our full privacy notice.

## **More information**

If you'd like more details about anything covered in this summary, please see our full Privacy Notice. You can view or download a copy by visiting [firstdirect.com/privacy](http://firstdirect.com/privacy) or if you prefer paper, give us a call on **03 456 100 100<sup>†</sup>** and we'll send you one in the post.

To contact our Data Protection Officer, contact us at PO Box 6201, Coventry CV3 9HW, addressed 'for the attention of the DPO'.

<sup>†</sup>Text-phone **03 456 100 147** or if calling from abroad **+44 113 234 5678** (Text Relay **+44 151 494 1260**). For more information on contacting us via BSL video relay service - visit [firstdirect.com/contact-us](http://firstdirect.com/contact-us). Because we want to make sure we're doing a good job calls may be monitored and/or recorded, we hope you don't mind.

# **HSBC Life (UK) Limited Privacy overview**

## **An overview of how we collect and use your information**

This is an overview of:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure
- your rights to your information.

## **More information**

For more details about anything covered in this overview, please see our full Privacy Notice. You can view or download a copy by visiting [hsbc.co.uk/privacy-notice](https://hsbc.co.uk/privacy-notice) or if you prefer paper, call **03 457 404 404** to get one sent in the post.

To contact our Data Protection Officer, contact us at PO Box 6201, Coventry CV3 9HW, addressed 'for the attention of the DPO'.

## **Who we are**

When we say 'we', we mean HSBC Life (UK) Limited, part of the HSBC Group of Companies, who is the 'data controller' for the information in this overview. This means we're responsible for deciding how we can use your information.

## **The information we collect**

We collect information about you from different places including:

- directly from you
- from a third party acting on your behalf e.g. an intermediary or broker who promote and distribute products for us
- from other HSBC companies, including HSBC UK Bank plc and **first direct**
- from publicly available sources
- from comparison websites or aggregators
- information relating to your medical records, with your agreement;
- information relating to your insurance claims history;
- information from other parties involved in your insurance policy or claim
- when we generate it ourselves
- from other organisations.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past.

You're responsible for making sure you give us accurate and up to date information. If you provide information for another person on your account, (including named insured or beneficiaries under your policy, dependants, claimants and other third parties involved in an insurance policy or claim (such as witnesses)), you'll need to tell them how to find the Privacy Notice and make sure they agree to us using their information for the purposes set out in it.

## **How we'll use your information**

We'll use it to provide the insurance products you've requested and other purposes e.g.:

- to confirm your identity and address
- to understand how you use your products and services
- to carry out your instructions

- to improve our products and services
- evaluate your insurance application and provide you with a quotation
- handle or monitor any claims which you make or which arise under your insurance policy
- where relevant, bring a claim against a third party
- apply for and claim on our own insurance policies
- to offer you other services we believe may benefit you unless you ask us not to.

We'll only use your information where we're allowed to by law e.g. carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

We need to collect sensitive health information for insurance purposes to:

- evaluate your insurance application and provide you with a quotation;
- handle or monitor any claims which you make or which arise under your insurance policy.

We may, for the purposes of underwriting this proposal, disclose to an approved medical agency, your name, address, doctor's details, telephone number and date of birth in order to arrange and obtain medical examinations and tests.

Where appropriate, we will ask for consent to collect and use this information.

We may use automated systems to carry out fraud and money laundering checks and to help us make decisions, e.g. to determine whether or not we can offer you insurance and at what price. We may base our decision on factors such as health, lifestyle and occupational information, as well as the level of cover being requested.

### **Who we can share your information with**

We may share your information with other companies we work in partnership with, agents or service providers who work for us or provide services to us, and other HSBC Group members. We may also share your information with others outside of the HSBC Group e.g. regulators, insurers, other banks, agents as well as fraud prevention agencies, other parties involved in providing your insurance policy such as the intermediary, broker, third parties involved in the administration of the relevant insurance policy or claim including loss adjusters, claims handlers, private investigators, experts and our advisers, and, where relevant, medical experts and rehabilitation providers.

We may carry out a post-sale check on the accuracy of the disclosures given in this application and if so, we will first obtain any appropriate consents.

### **How long we'll keep your information**

We'll keep your information for as long as you have a relationship with us. After it ends we'll keep it where we may need it for our legitimate purposes e.g. to help us respond to queries or complaints, or for other reasons e.g. fighting fraud and financial crime, and responding to requests from regulators.

### **Transferring your information overseas**

Your information may be transferred and stored in countries outside the European Economic Area, including some that may not have laws that provide the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection.

### **Your rights**

You have a number of rights relating to your information e.g. to see what we hold, to ask us to share it with another party, ask us to update incorrect or incomplete details, to object to or restrict processing of it, to make a complaint etc.

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