

M&S LIFE INSURANCE

Privacy Notice Overview

Effective from 11 December 2019

WHO ARE THE DATA CONTROLLERS?

M&S Bank (a trading name of Marks & Spencer Financial Services plc, registered office Kings Meadow, Chester CH99 9FB) is responsible for the promotion of M&S Life Insurance and introduction of customers to HSBC Life (UK) Limited. M&S Bank collect and use information about you during the promotion of the product which may be provided by you at the time but could also include information about you, e.g. any information held about you as a banking customer. M&S Bank will also receive personal data you submit during your application for M&S Life Insurance.

M&S Bank is the data controller in respect of this information, which may be used as set out in its Privacy Notice.

HSBC Life (UK) Limited ("HSBC Life", registered office 8 Canada Square, London E14 5HQ) arrange, administer and provide M&S Life Insurance. HSBC Life collect and use personal information about you (including sensitive information such as health information) so they can provide you with a quote for M&S Life Insurance and, if purchased, provide you with and administer a policy that suits your insurance needs. Some of the information may be collected directly from you during your application or policy term and some may be collected from other sources. HSBC Life is the data controller in respect of the personal information:

- you provide during your application for M&S Life Insurance;
- you provide throughout the lifetime of the policy;
- you provide at claims stage; or
- it collects from other sources.

Further information on how HSBC Life collects, uses and processes personal information is set out in its Privacy Notice.

AN OVERVIEW OF HOW M&S BANK WILL COLLECT AND USE YOUR INFORMATION

M&S Bank promote M&S Life Insurance and introduce customers to HSBC Life (UK) Limited. As a result, M&S Bank will receive personal data that you submit during your application for M&S Life Insurance, for the purposes of improving our products and services. We may also use your data to keep you up to date with our other products and services if you have explicitly provided marketing consent during your application.

Our Privacy Notice explains in further detail how we may use your personal information. Please read an overview of our Privacy Notice below, or you can access the full version at www.marksandspencer.com/bankprivacynotice or by writing to: M&S Bank, Kings Meadow, Chester, CH99 9FB.

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
- your rights to your information.

Who we are

When we say 'we', we mean M&S Bank, who is the data controller for your personal data received by HSBC Life in connection with your M&S Life Insurance policy. The data controller is responsible for deciding how your information is used and ensuring it is kept private and secure.

M&S Bank is a trading name of Marks & Spencer Financial Services plc. Registered in England No. 1772585. Registered office: Kings Meadow, Chester, CH99 9FB. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Marks & Spencer Financial Services plc is entered in the Financial Services Register under reference number 151427. M&S Bank is part of the HSBC Group of companies.

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 Group companies
- from Marks and Spencer plc
- 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 account, 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 any products and services you've requested and for other purposes, for example:

- 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
- 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 may use automated systems to help us make credit decisions as well as carrying out fraud and money laundering checks.

Who we can share your information with

We may share your information with other HSBC Group members and any subcontractors, agents, or service providers who work for us or other HSBC Group companies, as well as Marks & Spencer Financial Services plc. We may also share your information with others outside of the HSBC Group e.g. regulators, insurers, other financial institutions, brokers, agents as well as credit reference and fraud prevention agencies.

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 (EEA), 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.

Marketing

If you have opted in during your application for M&S Life Insurance, we may use your information to provide you with details about M&S Bank companies' products and services, and also products and services from our partners, Marks and Spencer Group and other relevant third parties. We may share your information with our advertising partners and social media platforms for this purpose. We may send you marketing messages by post, email, telephone, text, secure messages or through social media. You can change your mind on how you receive marketing messages or choose to stop receiving them at any time. To make that change, please contact us in the usual way.

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, to ask us to update incorrect or incomplete details, to object to or restrict processing of it, to make a complaint etc.

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 www.marksandspencer.com/bankprivacynotice or if you prefer paper, give us a call on **0345 900 0900** and we'll send you a copy in the post.

To contact our Data Protection Officer, contact us at M&S Bank, PO Box 10565, 51 Saffron Road, Wigston, LE18 9FT addressed 'for the attention of the DPO'.

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AN OVERVIEW OF HOW HSBC LIFE (UK) LTD WILL 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 www.hsbc.co.uk/privacy-notice or if you prefer paper, give us a call on **03457 404 404** 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'.

Who we are

When we say 'we', we mean HSBC Life (UK) Limited, part of the HSBC Group of companies, which is the 'data controller' for the information you provide during your application for M&S Life Insurance or the lifetime of the policy, or other information about you, as set out 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 Bank plc, first direct and M&S Bank
- 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 insureds or beneficiaries under your policy, dependants, claimants and other third parties (such as witnesses) involved in an insurance policy or claim), 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 for other purposes, for example:

- to confirm your identity and address
- to understand how you use our products and services
- to carry out your instructions
- to improve our products and services
- to evaluate your insurance application and provide you with a quotation
- to handle or monitor any claims which you make or which arise under your insurance policy
- where relevant, to bring a claim against a third party
- to 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 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.

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. Please feel free to contact us at support@lifeinsurance.mandsbank.com if you'd like to discuss this.

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.

The Reinsurance Group of America Incorporated (RGA) is the selected reinsurer that provides reinsurance services to us. As a result, your personal information, including sensitive information, will be disclosed to RGA, who may process this in connection with the provision of reinsurance services to us.

For more information on how RGA may use your personal information please see their Privacy Notice, at www.rgare.com/privacy-policy. Please rest assured that us and RGA are not permitted

to undertake any marketing activity using the information you have disclosed to us.

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, to ask us to update incorrect or incomplete details, to object to or restrict processing of it, to make a complaint etc.

Please call 0333 207 4240 if you would like to receive this information in an alternative format such as large print, Braille or audio.

Calls may be monitored or recorded.

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