

## M&S TRAVEL INSURANCE

# Privacy Notice

### WHO ARE WE AND WHO ARE THE DATA CONTROLLERS?

Aviva Insurance Ltd (Aviva) is the insurer of M&S Travel Insurance. Aviva collects and uses personal information about you so that 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 M&S Bank (a trading name of Marks & Spencer Financial Services plc), for example, during the sale of the policy. Aviva, is the data controller in respect of your personal information that it has received from M&S Bank, as distributor, 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.

M&S Bank, Kings Meadow, Chester, CH99 9FB, is responsible for the promotion and distribution of your M&S Travel Insurance. We will collect and use personal information about you during the promotion and sale of the product which 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. M&S Bank is the data controller for this information which will be shared with Aviva as set out in its Privacy Notice.

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

M&S Bank will share your personal information with Aviva to enable Aviva to provide you with a quote, administer your policy and manage your claims. If you make a claim, any information you give to us, or to Aviva, may be put in a register of claims database and it may be shared with other insurers to prevent fraudulent claims.

Please read an overview of our Privacy Notice below. You can access the full Privacy Notice at [www.marksandspencer.com/bankprivacynotice](http://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.

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 [www.marksandspencer.com/bankprivacynotice](http://www.marksandspencer.com/bankprivacynotice) or by writing to: M&S Bank, Kings Meadow, Chester, CH99 9FB.

### WHO WE ARE

When we say 'we', we mean M&S Bank who is the data controller for your M&S Travel Insurance. The data controller is responsible for deciding how your information is used and

ensuring it is private and secure.

M&S Bank is a trading name of Marks & Spencer Financial Services plc. Registered in England No. 1772585. Marks & Spencer Financial Services plc is entered in the Financial Services Register. Registration No. 151427. You can check the above registration details on the Financial Services Register by visiting the website [www.fca.org.uk/register](http://www.fca.org.uk/register) or by contacting the Financial Conduct Authority on 0800 111 6768. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

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 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 other purposes, for example:

- to confirm your identity and address
- to understand how you use your accounts
- 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**

M&S Bank will share your personal information with the insurer to enable the insurer to provide you with a quote, administer your policy and manage your claims. If you make a claim, any information you give to us, or to the insurer may be put in a register of claims database and it may be shared with other insurers to prevent fraudulent claims.

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 and Spencer 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.

## **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 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 or to make a complaint 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 the 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 [www.marksandspencer.com/bankprivacynotice](http://www.marksandspencer.com/bankprivacynotice) or if you prefer paper, give us a call on 0345 900 0900 and we'll send you one in the post.