

# Data Protection Statement for Individuals

Your privacy is important to us



# Data Protection Statement



We need to collect and hold personal data about you which we'll keep confidential and only share, with your consent, in the ways explained in this section or if the law says we have to.

The information supplied by you will become part of the data held by Zurich (Zurich Assurance Ltd as the 'data controller') in accordance with the provisions of the data protection legislation.

We protect your privacy by:

- collecting data about you fairly and only collecting data that we need
- telling you why we're collecting it and how we'll be using it
- using it only for our business operations and to comply with the law
- ensuring the data we collect and hold about you is accurate
- holding it only for so long as necessary and keeping it secure
- sharing it only with companies and organisations who'll keep it secure
- not sending it abroad without ensuring its security
- ensuring that you can exercise your rights under Data Protection legislation.

## Who controls your personal information

This notice tells you how Zurich Assurance Ltd, as data controller, will deal with your personal information. Where Zurich introduces you to a company outside the group, that company will tell you how your personal information will be used.

You can ask for further information about our use of your personal information or complain about its use, in the first instance, by contacting our Data Protection Officer at: Zurich Insurance Group, Unity Place, 1 Carfax Close, Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

If you have any concerns regarding our processing of your personal information, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is: First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

## What personal information we'll collect about you

We will collect and process the personal information that you give us by phone, email, filling in forms, including on our website, and when you report a problem with our website. We also collect personal information from your appointed agent such as your trustee, broker, intermediary or financial adviser in order to provide you with the services you have requested and from other sources, such as credit reference agencies and other insurance companies, for verification purposes. We will also collect information you have volunteered to be in the public domain and other industry-wide sources.

We will only collect personal information that we require to fulfil our contractual or legal requirements unless you consent to provide additional information. The type of personal information we will collect includes: basic personal information (for example, name, address and date of birth), contact details (for example, address, telephone number, mobile telephone number, email address), occupation and financial details, health and family information, claims and convictions information and where you have requested other individuals be included in the arrangement, personal information about those individuals.

If you give us personal information relating to other individuals which is used to provide you with a quotation and/or contract of insurance and/or provision of financial services, you agree you have their permission to do so. Except where you are managing the contract on another's behalf, please ensure that the individual knows how their personal information will be used by Zurich. More information about this can be found in 'How do you use my personal information' on the next page.

## How we use your personal information

We and our selected third parties will only collect and use your personal information (i) where the processing is necessary in connection with providing you with a quotation and/or contract of insurance and/or provision of financial services that you have requested; (ii) to meet our legal or regulatory obligations, or for the establishment, exercise or defence of legal claims; (iii) where you have provided the appropriate consent; (iv) for our “legitimate interests”. It is in our legitimate interests to collect your personal information as it provides us with the information that we need to provide our services to you more effectively including providing you with information about our products and services. We will always ensure that we keep the amount of information collected and the extent of any processing to the absolute minimum to meet this legitimate interest.

Examples of the purposes for which we will collect and use your personal information to provide your insurance policy include:

- to provide you with a quotation and/or contract of insurance
- to identify you when you contact us
- to deal with administration and assess claims
- to make and receive payments.

Where we rely on the lawful basis of legitimate interests, the interests being relied upon include:

- to improve and develop our business, products and services, or those of a third party, to ensure the accuracy of customer data and to develop our pricing and risk methods and models
- to help us better understand you and to obtain feedback on the service we provide to you including the use of analytics
- to prevent, detect and investigate fraud
- manage risk through data analysis, testing, research and statistical review
- communicating with you about matters relating to the day to day servicing and administration of the products you have with us
- carry out market research and product development, which can include creating customer demographics and/or profiling.

We and our selected third parties will only collect and use your sensitive personal information (for example, health or criminal conviction information) (i) where we have an insurance purpose to do so and there is a substantial public interest such as assessing your insurance application, arranging or administering a policy/plan and preventing and detecting fraud; (ii) where you have made your sensitive personal information public; (iii) where we need to use your sensitive personal information for the establishment, exercise or defence of legal claims. (iv) where we need to safeguard individuals who may be at risk.

We will contact you to obtain consent prior to processing your personal information for any other purpose, including for the purposes of targeted marketing unless we already have consent to do so.

## Who we share your personal information with

Where necessary, we share personal information for the purposes of providing you with the goods and services you requested with the types of organisations described below:

- Zurich’s group companies, details of which can be found [here](#)
- associated companies including reinsurers, suppliers and service providers
- brokers, introducers and professional advisers
- survey and research organisations
- credit reference agencies
- healthcare professionals, social and welfare organisations
- other insurance companies
- comparison websites and similar companies that offer ways to research and apply for financial services products
- fraud prevention and detection agencies
- companies who help us maintain, operate and promote our websites.

Also, in order to meet our legal or regulatory requirements, with the types of organisations described below:

- regulatory and legal bodies
- central government or local councils
- law enforcement bodies, including investigators
- credit reference agencies
- other insurance companies.

We may also share the following information with the types of organisations outlined above, for the purpose of statistical analysis, research, improving services and to measure the effectiveness of marketing and advertising campaigns:

- personal information - limited personal information, such as your name and postcode, but not containing any financial or sensitive details, including health data
- anonymised data - data encrypted to make it anonymous, which protects an individual's privacy by removing personally identifiable information
- pseudonymised data - personally identifiable information replaced with a pseudonym to make the data less identifiable, such as replacing a name with a unique number
- aggregated data - similar groups of data, such as age, profession or income which are expressed as a summary for statistical analysis.

### **How we use your personal information for websites and email communications**

When you visit one of our websites, we may collect information from you such as your email address or IP address. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit.

We use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website but not on your computer. Pixel tags usually work together with cookies to assist us to provide you with a more tailored service. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found on our websites.

### **How your personal information is transferred to other countries**

Where we transfer your personal information to countries that are outside of the UK or European Economic Area (EEA), we will ensure that it is protected and that the transfer is lawful. We will do this by ensuring that where necessary the personal information is given adequate safeguards by using 'standard contractual clauses' which have been adopted or approved by the UK and the EU, or other solutions that are in-line with the requirements of UK and where applicable European data protection laws.

A copy of our security measures for personal information transfers can be obtained from our Data Protection Officer at: Zurich Insurance, Unity Place, 1 Carfax Close, Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

### **How long your personal information is kept for**

We will keep and process your personal information for as long as necessary to meet the purpose it was originally collected. This includes if you request a quote from us but do not take up the policy.

There are a number of factors influencing how long we will keep this information including:

- complying with applicable laws and regulations or with requirements set out in codes issued by regulatory authorities or professional bodies
- performing our business processes, associated with the type of product or service you have requested
- what types of information that we hold about you
- whether your information relates to any ongoing, pending, threatened, imminent or likely dispute, litigation or investigation
- to enable us to respond to any questions, complaints, claims or potential claims
- if you or a regulatory authority require us to keep your information for a legitimate purpose
- to prevent and detect fraud.



## Access to medical reports

If we apply to your doctor for a medical report, we will need your permission under the Access to Medical Reports Act 1988 or the Access to Personal Files and Medical Reports (Northern Ireland) Order 1991.

Your medical report will provide information about:

- past and current health including relevant consultations, treatment, operations, investigations and test results that you may have undergone at any surgery, hospital, clinic, home visit or any that are pending
- details of any family history of disease that you have told your doctor about.

Your consent will give us access to this information. Your medical report will not ask about:

- negative tests for HIV, Hepatitis B or C
- incidences of sexually transmitted diseases unless there are long-term health implications
- predictive genetic test results unless there is a favourable test which shows you have not inherited a condition.

## What your data protection rights are

For the purposes of providing you with a contract of insurance, processing claims, reinsurance and targeted marketing, we will process your personal information by means of automated decision making and profiling where we have a legitimate interest and/or you have consented to this.

You have a number of rights under the data protection laws, namely:

- to access your personal information (by way of a subject access request)
- to have your personal information rectified if it is inaccurate or incomplete
- to have your personal information deleted or removed (in certain circumstances)
- to restrict the processing of your personal information (in certain circumstances)
- a right of data portability, namely to obtain and reuse your personal information for your own purposes across different services
- to object to direct marketing
- not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you
- to claim compensation for damages caused by a breach of the data protection legislation
- if we are processing your personal information with your consent, you have the right to withdraw your consent at any time.

You can exercise your rights by contacting our Data Protection Officer at: Zurich Insurance Group, Unity Place, 1 Carfax Close, Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

## What happens if you don't provide your personal information

If you do not provide us with your personal information, we will not be able to provide you with a contract or assess future claims for the service you have requested.



# Child Data Protection Statement for Group Critical Illness Claims



## Who Zurich Assurance Ltd is

We are an insurance company that have provided an insurance contract that provides cover in the event that you suffer, or are diagnosed with, a relevant critical illness (a medical condition or operation).

Zurich Assurance Ltd (Zurich), is the data controller which means we decide what information we collect about you and how we will use it. Where Zurich introduces you to a company outside the group, that company will tell you how your personal information will be used.

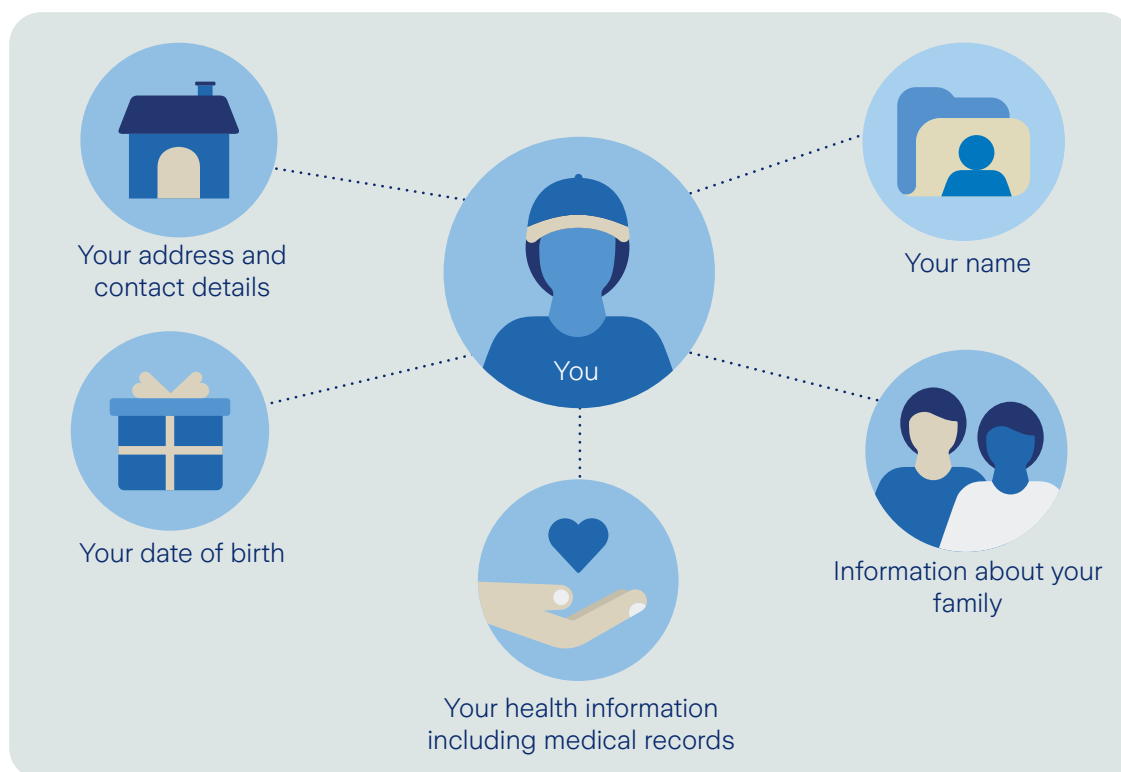
## What a data protection statement is

Our data protection statement tells you:

- why we collect your personal information
- how we'll use it, share it, and protect it.

## What personal data is and what information will be collected about you

Personal data is any information that could be used to identify you. Here are a few examples of the data we'll collect and use.

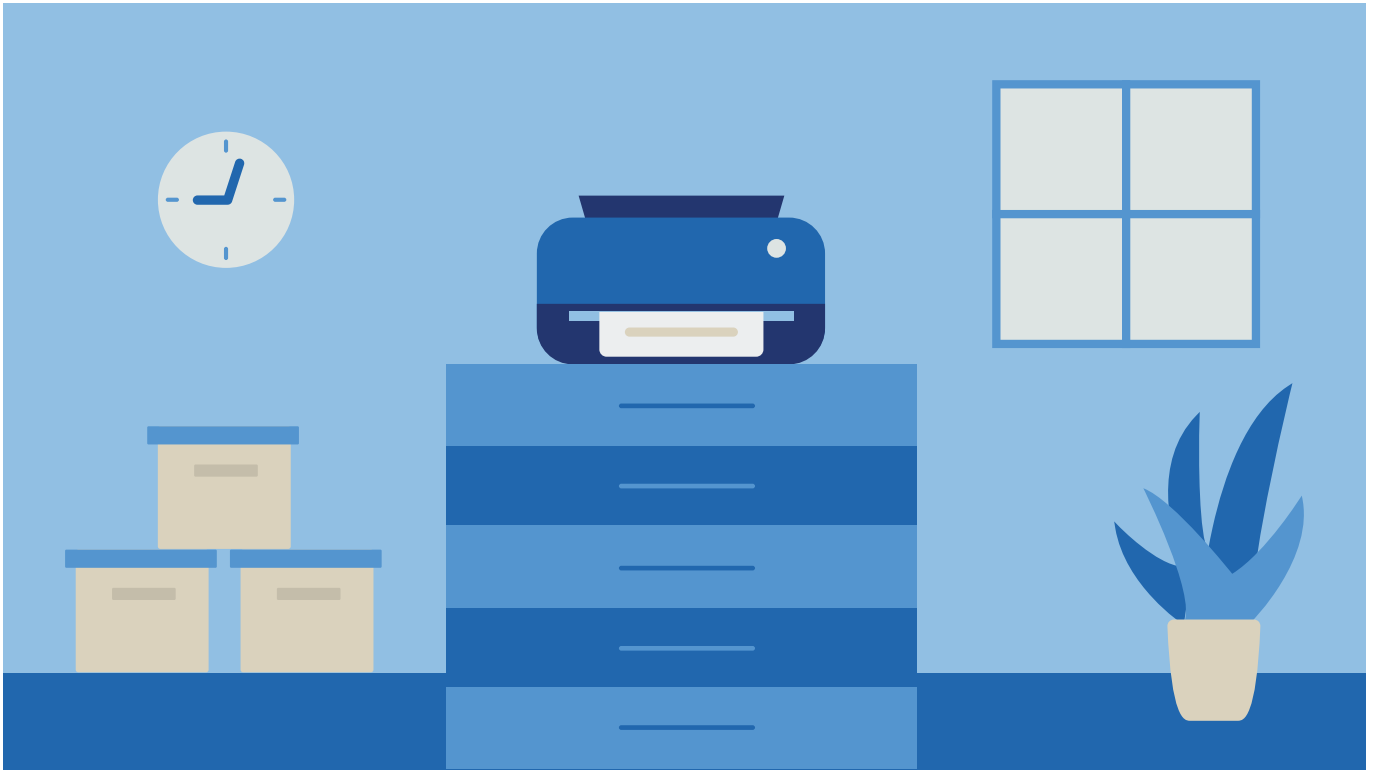


The type of personal information we will collect includes but is not limited to:

**Basic personal data** like name, biological sex, address, date of birth, contact details.

**Special category data** which is more sensitive and includes information about your health including your medical records, ethnicity, religion,

**Publicly available information** such as convictions information and information available on social media.



## Why we collect and use your information

We will only collect and use personal information, with your consent that's needed to:

- consider whether we are able pay a claim under the insurance policy
- respond to any complaints, or disputes in respect of the claim
- prevent or detect fraud
- manage risk and improve our services through anonymised data analysis, testing, research and statistical review
- meet our legal or regulatory obligations.

Consent will be provided either by yourself or, by someone acting on your behalf with appropriate authority.

We'll only use your information for the reasons we told you about. For example, we won't use your information for marketing about other products.

We will collect and use the personal information that you or someone acting on your behalf gives us by phone, email or by filling in forms. We also collect personal information from your medical professionals and from other sources, such as other insurance companies. We may also collect information which you have shared publicly or other industry-wide sources.



## How we control and keep your personal information safe

As data controller, we protect your data and privacy by:



You can ask for further information about our use of your personal information or complain about its use, in the first instance, by contacting our Data Protection Officer at: Zurich Insurance Group, Unity Place, 1 Carfax Close, Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

If you have any concerns regarding our processing of your personal information or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is: First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.



## Sharing your personal information

We'll only share personal data about you, with consent, in the ways explained in this section or if the law says we have to.

Where necessary, we share personal information, to consider whether we are able pay a claim under the insurance policy, with the types of organisations described below:

- associated companies including reinsurers, suppliers and service providers
- brokers and professional advisers
- healthcare professionals, social and welfare organisations
- other insurance companies
- fraud prevention and detection agencies.

Also, where we have to because of the law or regulation with the types of organisations described below:

- regulatory and legal bodies
- central government or local councils
- law enforcement bodies, including investigators
- credit reference agencies
- other insurance companies.

We may also share some personal information with companies we use to help improve our services.

## How your personal information is transferred to other countries

If we transfer your personal information to countries that are outside of the UK or European Economic Area (EEA), we will ensure that it is protected and that the transfer is lawful.

A copy of our security measures for personal information transfers can be obtained from our Data Protection Officer at: Zurich Insurance Group, Unity Place, 1 Carfax Close, Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

## How long we keep your personal information

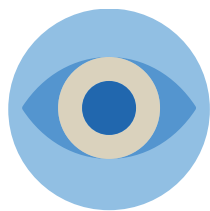
We will keep and use your personal information for as long as we need for the reason it was originally collected, and where we are required, or are able to do so, because of the law.

While we hold your data, we will keep it secure and when we no longer require the information we will destroy it, this means we will no longer have it or any copy it.



## Your data protection rights

You have a number of rights under the data protection laws, including:



the right to see copies of your personal information that we have (the way you request this is by contacting us and asking for a 'subject access request')



a right of data portability, this means that we will provide your personal information in a format that is easy for you to use for your own purposes



to ask us to change your personal information if it is not correct or there is information missing



to claim compensation for damages caused by a breach of the data protection legislation



in some cases, to have your personal information deleted or removed



if we are using or sharing your personal information with your consent, you have the right to withdraw your consent at any time



in some cases, to restrict the use and sharing of your personal information

You can exercise your rights by contacting our Data Protection Officer at: Zurich Insurance Group, Unity Place, 1 Carfax Close, Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

## What happens if you don't provide your personal information

If you do not provide us with your personal information, we will not be able to assess the claims.

## Access to medical reports

If we apply to your doctor for a medical report, we will need your permission under the Access to Medical Reports Act 1988 or the Access to Personal Files and Medical Reports (Northern Ireland) Order 1991.

Your medical report will provide information about:

- past and current health including relevant consultations, treatment, operations, investigations, and test results that you may have undergone at any surgery, hospital, clinic, home visit or any that are pending
- details of any family history of disease that you have told your doctor about.

Your consent will give us access to this information. Your medical report will not ask about:

- negative tests for HIV, Hepatitis B, or C
- incidences of sexually transmitted diseases unless there are long-term health implications
- predictive genetic test results unless there is a favourable test which shows you have not inherited a condition.

