

Privacy & Cookie Policy

Privacy Policy

Your privacy is important to us and we are committed to keeping it protected. We have created this Customer Privacy Notice which will explain how we use the information we collect about you and how you can exercise your data protection rights. This Privacy Notice will help you understand the following:

Who are we?

We are Royal & Sun Alliance Insurance Ltd (RSA), we provide commercial and consumer insurance products and services under a number of brands. We also provide insurance services in partnership with Tesco Personal Finance (trading as Tesco Bank).

To find out how Tesco Bank manage and use your personal information, the data they hold about you and about your data protection rights please see their privacy notice at: www.tescobank.com/assets/sections/petins/pdf/tesco-pet-insurance-privacy-notice.pdf or contact them on 0345 078 3878.

Why do we collect and use your personal information?

As an insurer, we need your personal information to understand the level of insurance cover you require. We'll use this information (e.g. your name, address, telephone number and email address) to communicate with you.

We need to use your information to create a quote for you, allowing you to buy insurance products from us. When buying a product from us, you'll also need to provide us with details about the pet you wish to be covered by the insurance.

Once you become a customer, we'll need to take your payment details to set up your cover. This could be direct debit, credit or debit card information. To service your policy, we might contact you via our website, emails, telephone calls or post. When using these services we might record additional information, such as passwords, online identifiers and call recordings.

If you need to claim against your insurance policy, we will need to collect information about the incident and this may be shared with other selected companies to help process the claim. If other people are involved in the incident, we may also need to collect additional information about them which can include special categories of personal data (e.g. injury and health data).

Data protection laws require us to meet certain conditions before we are allowed to use your personal information in the manner described in this Privacy Notice. To use your personal information, we will rely on one or more of the following grounds:

- **Performance of contract:** We need to use your personal information in order to provide you with the policy (which is a contract of insurance between you and us), and perform

our obligations under it (such as making payments to you in respect of a claim made under the policy).

- **Consent** – In certain circumstances, we may need your consent unless authorised by law in order to use personal information about you which is classed as “special categories of personal data”.
- **Necessity to establish, exercise or defend legal claim** – If you, or we, bring a legal claim (e.g. a court action) against the other, we may use your information in either establishing our position, or defending ourselves in relation to that legal claim.
- **Compliance with a legal obligation** – Where laws or regulations may require us to use your personal information in certain ways.
- **Legitimate Interests** – We will also process your personal information where this processing is in our “legitimate interests”. When relying on this condition, we are required to carry out a balancing test of our interests in using your personal information (for example, carrying out market research), against the interests you have as a citizen and the rights you have under data protection laws. The outcome of this balancing test will determine whether we can use your personal information in the ways described in this Privacy Notice. We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

Where else do we collect information about you?

Where possible, we'll collect your personal information directly from you. However, on occasion we may receive details about you from other people or companies. For example, this might happen if:

- It was supplied to us when you purchased an insurance product or service that is provided by us in partnership with other companies; or
- It was lawfully collected from other sources (e.g. Claims and Underwriting Exchange) to validate the information you have provided to us.

We request those third parties to comply with data protection laws and to be transparent about any such disclosures. If you would like some further information, please contact us.

Will we share your personal information with anyone else?

We do not disclose your information outside of RSA except:

- Where we need to check the information you gave to us before we can offer you an insurance product;
- Where we are required or permitted to do so by law or relevant regulatory authority (e.g. fraud detection/prevention);
- Where we provide insurance services in partnership with other companies;
- In the event that we are bought or we sell any business or assets, in which case we will disclose your personal information to the prospective buyer of such business or assets;

- As required to enforce or apply this Privacy Notice, or the contract of insurance itself;
- Within our group for administrative purposes;
- If we appoint a third party to process and settle claims under the policy on our behalf, in which case we will make your personal information available to them for the purposes of processing and settling such claims;
- With our third party service providers (including hosting/storage providers, research agencies, technology suppliers etc.);
- With our reinsurers (and brokers of reinsurers) in connection with the normal operation of our business;

Sometimes your personal information may be sent to other parties outside of the European Economic Area (EEA) in connection with the purposes set out above. We will take all reasonable steps to ensure that your personal information is treated securely and in accordance with this Privacy Notice, and in doing so may rely on certain “transfer mechanisms” such as the EU-US Privacy Shield, and the standard contractual clauses approved by the European Commission. If you would like further information please contact us.

Which decisions made about you will be automated?

Before we can offer you an insurance product or service, we may need to conduct the following activities, which involve automated (computer based) decision-making:

- **Pricing and Underwriting** – this process calculates the insurance risks based on the information that you have supplied. This will be used to calculate the premium you will have to pay.
- **Automated Claims** – some small claims may qualify for automated processing, which will check the information you provide, resulting in a settlement or rejection of your claim.

The results of these automated decision-making processes may limit the products and services we can offer you. If you do not agree with the result, you have the right to request that we perform a manual reassessment using the same information that you originally provided. If you wish to do so please contact us.

For how long will we keep your information?

Your personal information will be retained under one or more of the following criteria:

- Where the personal information is used to provide you with the correct insurance cover, which will be kept as long as it is required to fulfil the conditions of the insurance contract.
- Where the use of your personal information for a specific purpose is based on your consent, it will be kept for as long as we continue to have your consent.
- Where, for a limited period of time, we are using some of your information to improve the products or services we provide.
- For as long as your information is required to allow us to conduct fraud and/or criminal checks and investigations.

Your information is incorrect what should you do?

If you hold a product or service with us and think that the information we hold about you is incorrect or incomplete, please contact us and we will be happy to update it for you.

What are your rights over the information that is held by RSA?

We understand that your personal information is important to you, therefore you may request the following from us to:

1. Provide you with details about the personal information we hold about you, as well as a copy of the information itself in a commonly used format. [Request Ref: DSR 1]
2. Request your personal information be deleted where you believe it is no longer required. Please note however, we may not be able to comply with this request in full where, for example, you are still insured with us and the information is required to fulfil the conditions of the insurance contract. [Request Ref: DSR 2]
3. Request the electronic version of the personal information you have supplied to us, so it can be provided to another company. We would provide the information in a commonly used electronic format. [Request Ref: DSR 3]
4. Request to restrict the use of your information by us, under the following circumstances [Request Ref: DSR 4]:
 - a. If you believe that the information we hold about you is inaccurate, or;
 - b. If you believe that our processing activities are unlawful and you do not want your information to be deleted.
 - c. Where we no longer need to use your information for the purposes set out in this Privacy Notice, but it is required for the establishment, exercise or defence of a legal claim.
 - d. Where you have made an objection to us (in accordance with section 5 below), pending the outcome of any assessment we make regarding your objection.
5. Object to the processing of your data under the following circumstances [Request Ref: DSR 5]:
 - a. Where we believe it is in the public interest to use your information in a particular way, but you disagree.
 - b. Where we have told you we are using your data for our legitimate business interests and you believe we shouldn't be (e.g. you were in the background of a promotional video but you did not agree to be in it.)

In each case under section 5 above, we will stop using your information unless we can reasonably demonstrate legitimate grounds for continuing to use it in the manner you are objecting to.

If you would like to request any of the above, please contact us and submit a written request, including the request reference (e.g. DSR 1), as this will speed up your request. To ensure that we do not disclose your personal information to someone who is not entitled to it, when you are making the request we may ask you to provide us with:

- Your name;
- Address(es);
- Date of birth;
- Any policy IDs or reference numbers that you have along with a copy of your photo identification.

All requests are free of charge, although for requests for the provision of personal information we hold about you (DSR1) we reserve the right to charge a reasonable administrative fee where, we believe an excessive number of requests are being made. Wherever possible, we will respond within one month from receipt of the request, but if we don't, we will notify you of anticipated timelines ahead of the one month deadline.

Please note that simply submitting a request doesn't necessarily mean we will be able to fulfil it in full on every occasion – we are sometimes bound by law which can prevent us fulfilling some requests in their entirety, but when this is the case we will explain this to you in our response.

Our Privacy Notice

If you have any queries regarding our Privacy Notice please contact us and we will be happy to discuss any query with you. Our Privacy Notice will be updated from time to time so please check it each time you submit personal information to us or renew your insurance policy.

How you can contact us about this Privacy Notice?

If you have any questions or comments about this Privacy Notice please contact:

The Data Protection Officer
RSA

Bowling Mill
Dean Clough Industrial Park
Halifax HX3 5WA

You may also email us at crt.halifax@uk.rsagroup.com.

How you can lodge a complaint?

If you wish to raise a complaint on how we have handled your personal information, please send an email to crt.halifax@uk.rsagroup.com or write to us using the address provided. Our Data Protection Officer will investigate your complaint and will give you additional information about how it will be handled. We aim to respond in a reasonable time, normally 30 days.

Cookie policy

What is a cookie?

RSA use cookies to enhance your experience on our website.

Cookies are small text files that are downloaded to your device when you visit a website. Cookies send information back to the originating website each time you visit it or any other website that recognises the cookie.

How cookies are used

Cookies do many different jobs. They can help you to navigate between pages efficiently, remember your preferences, and improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

Accepting or rejecting cookies

Most web browsers will accept cookies, but if you would prefer we did not collect data by this method, you can disable this function within your browser settings.

If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies.

We use cookies to:

- Collect information that will help us to distinguish visitors, to understand visitors' browsing habits on our website and to improve their experience;
- Compile statistical reports on website activity e.g. numbers of visitors and the pages they visit;
- Collect information that will allow us to tailor advertising to make it more relevant for you, based on your previous interactions with our website;
- Remember information about you when you visit our site. **Some of the cookies are essential in order to provide our services to you.**

Different types of cookies

Below, we have set out the categories of cookies that we use on our websites.

These cookies are:

- Persistent cookies;
- Session cookies;
- Strictly necessary cookies;
- Performance cookies;
- Experience cookies;
- Functionality cookies;
- Targeting cookies.

Some of our websites also include **third party cookies**, which are cookies not set by RSA. RSA have specified where third party cookies are used.

Persistent cookies – These remain on a user's device for a time period specified in the cookie. They are activated each time the user visits the website that created that particular cookie.

Session cookies – Session cookies allow website operators to link user’s actions during a browser session. The session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are temporary – once the browser is closed, all session cookies are deleted.

You can find more information about cookies at:

www.allaboutcookies.org
www.youronlinechoices.eu

Strictly necessary cookies

These cookies enable services you ask for.

These cookies are essential to allow you to move around the website and use its features, such as accessing secure areas. Without these cookies, we cannot provide you with the services you ask for; you would be unable to apply for our products and services, or manage your products online.

RSA use the following first party strictly necessary cookies:

- ASP.NET_SessionId
- parentHandle

There are no third party cookies in this category.

RSA update their site frequently and sometimes that involves some changes in the cookies they have listed above. RSA try their best to keep this list up to date but due to various technical constraints RSA can only update this list every three months.

Performance cookies

These cookies collect anonymous information on the pages you visit.

Performance cookies collect information about how visitors use the website, such as which pages visitors go to most often, and whether they get error messages from web pages. Performance cookies don’t collect information that identifies an individual – they are only used to improve the website.

RSA use the following first party performance cookies. Some of them may also appear as third party cookies:

Adobe Omniture

- s_vi
- s_cc
- s_ev21
- s_fid
- gpv_p31
- s_ppvi
- s_ptc
- s_sq
- s_vnum
- s_lv

Adobe Target

- mbox
- mboxPC
- mboxSession

Liveperson

- LPSessionID
- LPVisitorID

Some of these may be set as first or third party cookies, depending on which part of our website you’re browsing.

RSA update their site frequently and sometimes that involves some changes in the cookies they have listed above. RSA try their best to keep this list up to date but due to various technical constraints RSA can only update this list every three months.

RSA use the following first party functionality cookies. Some of them may also appear as third party cookies:

Web chat services

- SmartMaxUser
- SmartMaxSession
- ASPESSIONIDCASDSDRC
- ASPESSIONIDQCTATCRA
- ASPESSIONIDSCTDQDTB
- LivePersonID

In addition, some of our partners may use third party cookies in this category.

RSA update their site frequently and sometimes that involves some changes in the cookies listed above. RSA try their best to keep this list up to date but due to various technical constraints RSA can only update this list every three months.

Experience cookies

Cookies can also allow us to improve the content of our website to suit your interests.

For example, instead of showing messages about products you already have, experience cookies allow us to offer you a more tailored, better user experience.

Functionality cookies

These cookies improve your experience by remembering the choices you’ve made. They allow the website to remember choices you make (such as your name, language or the region you’re in) and provide enhanced, more personal features.

Cookies can also be used to remember changes made to text size, fonts and other parts of web pages. They may be used to provide services you ask for such as playing a video or adding a comment on a blog. The information these cookies collect may not reveal the person’s identity and they cannot track browsing activity on other websites.

Targeting or advertising cookies

Targeting cookies collect information about browsing habits to make advertising more relevant to you and your interests. They are also used to limit the number of times an advertisement is seen and to measure the effectiveness of the advertising campaign.

We may use cookie information collected from our website and apps to select who we display advertisements to on third party websites, including social media sites.

Examples include:

- Cookies placed by advertising networks to collect browsing habits in order to target relevant adverts to you. The site you're visiting may not actually be serving adverts, but often this will be the case.
- Cookies placed by advertising networks to complement services used by website operators to increase functionality; for example, commenting on a blog, adding a site to your social network, providing maps or counters of visitors to a site. We don't use any first party cookies for targeting, however some of our partners may use third party cookies in this category.

Information on deleting or controlling cookies is available at <http://www.allaboutcookies.org>

Behavioural, advertising and online privacy

The internet advertising industry has produced an online guide to behavioural advertising and online privacy at:

www.youronlinechoices.eu

The guide contains an explanation of the Internet Advertising Bureau's selfregulatory scheme to allow you greater control of the advertising you see.

Using browser settings to manage cookies

Most browsers will allow you to stop accepting new cookies. Information on how to do this can usually be found under 'help' in your browser's menu bar.

The help section should also explain how to control notifications about new cookies, and information on how to disable them completely. You can disable or delete similar data, such as Flash cookies, using browser add-ons, by changing the add-on's settings or visiting the website of its manufacturer.

Cookies allow you to take advantage of some essential features of the Tesco Bank website, so can be left enabled. If you block or otherwise reject cookies you may not be able to use our products, services and other facilities. Please note that if you disable all cookies, the website functionality may be impaired and prevent you from obtaining a quotation or completing your purchase online. If you're using a shared computer, and have cookies turned on, remember to sign off when you finish.

Keeping safe online

We advise our customers to always close down the browser they've used after accessing our site to ensure other users can't obtain access to their data. This is best practice when using both home and 'public' computers.