

# How we use your personal information

This document explains how we collect, use, share and store your personal information. It applies to personal information provided to us, both by you or by others on your behalf. It also explains the rights you may have in relation to the personal information that we hold about you.

Where you submit information about others such as family members and beneficiaries, this document also explains how their information will be used. Please make sure that they are provided with a copy of this document or know where to access it.

We want you to be confident about how we use your personal information. As a regulated company and information controller we take our responsibilities for the security and management of your personal information seriously. That's why we invest in our systems and processes to ensure that the way we collect, use, share, and store your information meets both the regulatory and our own high standards.

We may change the way we use personal information. When this happens we'll inform you when we need to, for example, on our website.

## Who we are and how to contact us

LV= is committed to protecting the privacy and security of your personal information. As at the date of this document, the data controller entities within the Liverpool Victoria group of companies includes:

Liverpool Victoria Financial Services Limited (LVFS)  
Liverpool Victoria Life Company Ltd  
Liverpool Victoria Financial Advice Services Ltd  
NM pensions Trustees Ltd  
Sovereign Unit Trust Managers Ltd  
LV Equity Release Ltd  
Teachers Assurance Company Ltd  
LV Commercial Mortgages Ltd  
LV Protection Ltd  
LV Capital

"LV=" is used to describe the Liverpool Victoria group of companies.

If you have any questions about how we process your personal information, please get in touch with us at:

The Data Access Team, LV=, County Gates, Bournemouth, BH1 2NF or email us at: [Dataaccess@lv.com](mailto:Dataaccess@lv.com)

You can also contact our Data Protection Officer: LV=, County Gates, Bournemouth, BH1 2NF or via email at [DPO@LV.com](mailto:DPO@LV.com).

## Information we collect

We only ask for information that we need, and have strict controls to keep it safe. We collect personal information to provide our quotes, products and services. Without the information we ask for, we can't provide you with the products or services you have requested and, where applicable, it may affect the outcome of any claims made. Personal information we collect will be held in digital and or paper files.

To help us understand your needs and the types of product and service that we can offer you, we collect information about your lifestyle, health, hobbies and leisure activities along with family history, occupation, earnings, and other incomes and assets.

**Information about you** – for example name, age, gender, date of birth, and nationality. We need this information to help us identify you, but also to allow us to contact you at the right time - such as when you're approaching the end of your plan term.

- Government identifiers – for example identification document (driving license, passport) information.;
- Contact information – for example email, address, postcode and phone number;
- Financial information – for example salary and bank account details for any payments you make to us or we make to you;
- Contractual Information – for example details about your products and benefits;
- Family & beneficiary's information – for example marital status, next of kin or nominated beneficiaries;
- Underwriting information – for example your job, interests, travel, health, sickness records and family history. For larger cases we may need additional financial information. We use this information to decide if, and on what terms, we can offer you insurance cover;
- Information about your Nationality and residency status;
- Information regarding fraud database checks including CIFAS and SIRA;
- Personal details of any nominated individuals, as provided by you within any expression of wish.

## Where is this information from:

Most of the information we receive comes directly from you or your Financial Adviser or Intermediary (this is a company or person that acts as a bridge between the insurance provider and the end customer, most often used when you apply through an Online comparison sites) when you:

- ask for a pre underwriting advice, quote or apply for a policy;
- buy and / or use a product or service;
- ask us a question;
- make, or inform us of a claim or incident;
- make or receive a payment;
- update your personal details;
- change your cover;
- register a complaint;
- take part in market research (for example, customer satisfaction surveys);
- update how we contact you with marketing;
- change ownership of a policy (for example, putting a policy in trust);



- nominate a beneficiary for the policy;
- ask for someone to help support the administration of your policy or help support you when making a claim;
- get advice about retirement;
- review your investments.

We may also get personal information about you from other sources:

- Tracing companies - if we lose touch with you, we may source information such as contact details so we can get in touch and remind you about your product or supply you with servicing information that you need to know;
- Medical professionals – for example, if we need information for underwriting purposes or to support an ill health claim;
- Comparison services/portals - if your adviser used a comparison service or portal to obtain multiple quotes at once, the portal provider may share your underwriting information with us;
- Credit reference agencies - so we can check your identity;
- Fraud and sanctions related data – includes information obtained as a result of our investigations, e.g. carrying out checks of publicly available sources such as newspapers and social media sites and information obtained from checks of fraud databases and sanctions lists such as relationships/close associations with politically exposed persons;
- Authentication data – includes account log-in information, passwords etc. for accessing your LV= accounts;
- Vulnerability data – information about health, life events, and capability that helps us identify if you might have additional support requirements in order that that we can better meet your needs;
- Data relating to other LV= applications or policies – e.g. policy and claim histories relating to other existing LV= policies or products or those you may have applied for or held in the past, and contact details where you may have advised LV= about a change on one product, but not another.

**Children's data:** We collect data about children in some circumstances, e.g. where they are eligible for a child's critical illness claim or where they are beneficiaries of a policy in trust.

## How we use and share personal information

The personal information we ask for will be used by us and third parties who process information on our behalf. This includes organisations who administer or assist us in administering policies, servicing claims and reinsurers.

We also share data with Insurance brokers, financial advisors, investment companies and business partners who submit your application to allow them to look after your financial health.

If you have requested a KFI for a Lifetime Mortgage Lump Sum Lifestyle or Lifetime Mortgage Drawdown lifestyle your personal data will be shared with Scottish Widows, to find out how they use your personal data please visit [scottishwidows.co.uk/legal-information/legal-and-privacy](https://scottishwidows.co.uk/legal-information/legal-and-privacy).

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 1 Where we need to perform the contract we have entered into with you.
- 2 Where we need to comply with a legal obligation.
- 3 Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- 1 Where we need to protect your interests (or someone else's interests).
- 2 Where it is needed in the public interest (or for official purposes).

## Legal grounds for processing personal information

We collect personal information to provide our quotes, products and services.

As a regulated financial services organisation we're required to comply with legal and regulatory obligations such as the prevention, detection and reporting of fraud and other financial crime.

We'll process personal information for our legitimate interests, when we have a business reason to do so. For example:

- Setting up and administering your plan;
- Completing any requests or claims you make this includes: Changing your cover. Changing the terms of your plan and who is covered. Processing a claim in the unfortunate event of your ill health;
- If we lose touch, we may source information such as contact details so we can get in contact and tell you about your product;
- develop, improve, and personalise our products, pricing and services;
- enhance our customer service, experience, and relationship (for example, customer and market research, business analysis, provide relevant product and service information);
- improve the relevance of our advertising and marketing campaigns;
- to comply with our legal and regulatory obligations, guidelines, standards and codes of conduct, e.g., background checks or the prevention, detection and investigation of financial crime or fraud;
- develop and improve our administration, security systems and insurance applications;
- promote responsible lending and help prevent over-indebtedness;
- share it with third parties in the event of organisational change (for example, if we bought or merged with another organisation);

- share personal information with other LV= companies;
- to retain your policy record for a period of time in order to ensure we have appropriate records in place in respect of any future claims that may be insured by us or to be able to support any complaints you may bring against us or a third party;

We can only collect and use Sensitive Personal information where we have an additional, specific lawful basis to process such information. We usually rely upon one of the following lawful bases where we process Sensitive Personal Information:

- Reasons of substantial public interest:
  - insurance purposes –advising on, arranging, underwriting and administering contracts of insurance, administering claims under a contract of insurance and exercising rights, or complying with obligations that arise in connection with contracts of insurance;
  - complying, or helping someone else comply with, a regulatory requirement relating to unlawful acts and dishonesty and fraud - including regulatory requirements to carry out money laundering checks;
  - preventing or detecting unlawful actions – including disclosures to regulatory authorities;
  - preventing fraud – including investigating alleged fraud;
  - safeguarding the economic well-being of certain individuals – including where we identify additional support required by our vulnerable customers;
  - equality of opportunity or treatment through additional support – including where we need to keep under review the needs of customers with additional support requirements;
- Necessary to establish, exercise or defend a legal claim – including where we are faced with legal proceedings, we bring legal proceedings ourselves or where we are investigating legal proceedings that a third party has brought against you;
- Information has been clearly or obviously made public by you.

If we need your consent to process personal information, we'll ask for this first. You can withdraw your consent at any time.

In an emergency we'll manage your products or claims until you or someone else is able to act on your behalf.

## Use of data

### Medical and other health services

We may ask your doctor or any medical practitioner you have consulted to send us a medical report or information from your medical records. We will only do this if we get your consent first.

If you give us consent to contact a medical practitioner, you are free to withdraw this at any time by contacting us.

You don't have to give your consent but if you don't give your consent, or if you later withdraw it we may not be able to continue to provide cover or consider any claim.

We also use other companies to provide additional health and medical services, for example nurse screenings or rehabilitation support in the event of a disability claim.

We'll give them the personal information they need to manage their services (for example, contact information to make an appointment). Again, we will let you know if this happens.

### What information could be shared in a medical report or record?

A medical report is a comprehensive report that covers a person's medical history. A medical report is a vital piece of evidence that can support your application or validate your insurance claim.

### What can be included in a Medical Report?

A medical report may include, but is not limited to the following items:

- An overview of your medical history;
- Documentation of your diagnosis;
- Documentation of any medications you take or have taken since for certain conditions;
- A history of your treatments;
- Your response to treatments;
- A history of hospitalisations;
- Test results;
- Findings of physical and mental examinations;
- Statements confirming your limitations and abilities;
- A history of your work absences.

### What can be included in medical records?

There are times when we may have to ask for a copy of your medical records. This is different to a report requested from a medical practitioner. Your medical records are your full medical history.

Any request we make for your medical records would usually be for a specific time period or in relation to the claim being made or to support the management of any on-going claim. We may request these instead of or in addition to a medical report provided by a medical practitioner.

We will only request medical records if we get your consent first and again you can withdraw this at any time by contacting us.

You don't have to give your consent but if you don't give your consent, or if you later withdraw it we may not be able to continue to provide cover or consider any claim.

## Payment card details

We use the payment card or bank details provided to enable money to be paid to us and for us to pay money out. We use a secure payment processor for all card payments. When a payment is processed we receive a unique transaction code and an extract of your card number, which we store as a record of the transaction.

If we intend to make a change to a payment, we'll always get in touch in advance to tell you if and when we intend to change payments in any way.

We will advise the policy holder of any payments changes/issues even if they are not the payer as it affects the policy holders contract of insurance.

## Automated decision making and profiling

We use automated decision making to help determine the prices, policy terms, relevant products / services, when you research or ask for a quote, buy our services or products, make any changes, renew or make a claim. We may also profile you based on your personal information and that provided by third parties. Profiling may be used to help determine the likelihood of a claim or policy transaction being fraudulent.

Profiling will also be used to enhance our understanding of you and to help us make our business decisions (for example, product design, pricing, customer journeys or marketing strategy). If you've chosen to receive marketing information from us, profiling will be used to make our marketing more relevant, for example, personalise the channels used to market to you, the marketing messages used and the offers you're sent.

## Vulnerability

The Financial Conduct Authority defines a vulnerable consumer as someone who, due to their personal circumstances, is especially likely to experience disadvantage. It's been identified that a lot of people will be vulnerable at some point in their life, so we need to make sure we can identify who these customers are and support them.

For example, we may provide additional information on our statements where we suspect our customers might be less financially capable or less engaged in financial matters. In the future we'd like to keep a note of the category you fall into, against your records, so we can tailor our communications to suit you. Before we do this we'll assess if this is fair.

## International transfers

In the event that we process personal information outside the UK, we will always take steps to ensure that any transfer of Personal Information outside the UK is managed to protect your privacy rights and ensure adequate safeguards are in place. This might include transfers to countries that the UK considers will provide adequate levels of data protection for your Personal Information (such as countries in the EEA) or putting contractual obligations in place with the party we are sending information to.

Where a claim occurs abroad we will also send data to the necessary service providers and agencies as required to service your claim.

## Financial crime & fraud prevention agencies

The personal information we have collected will be shared with crime prevention agencies who will use it to prevent financial crime and fraud and to verify your identity. If financial crime or fraud is detected, you could be refused certain services, finance or employment.

Where we suspect financial crime or fraud, we may cancel any policies you have with us, not be able to pay any claim or offer you the requested product or service. We may share relevant information with crime and fraud prevention agencies, law enforcement agencies and other relevant organisations.

## Terrorist Financing

We use your information to make sure we comply with any financial sanctions that apply in the UK and overseas.

This includes;

- checking your information against sanctions lists;
- sharing your information with HM and international regulators if required.

LV= will contact you if more information is needed to comply with any financial sanctions.

## Regulatory bodies

Your personal information will be used or disclosed as required to regulators to monitor and enforce our compliance with any regulation.

In order to meet our legal obligations as a Company Limited by Guarantee we are required to share personal information relating to our members with Companies House who will publish a list of our members on its website. A person/organisation may request to inspect or request a copy of all or part of the member register.

## Credit search and identity check

In order to process the product or service you have applied for, we may supply your personal information to credit reference agencies (CRAs) and they'll give us information about you, such as about your financial history. We do this to assess credit worthiness, check your identity, manage your account, trace and recover debts and prevent fraud and other financial crime.

We'll also continue to exchange information about you with CRAs on an on-going basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your personal information with other organisations. Your data will also be linked to the data of any joint applicants or other financial associates you have.

The identities of the CRAs and the ways in which they use and share personal information are explained in more detail at [experian.co.uk/crain](http://experian.co.uk/crain), [callcredit.co.uk/crain](http://callcredit.co.uk/crain) and [equifax.co.uk/crain](http://equifax.co.uk/crain).

## Partner or affinity associations

If you get a quote or buy through one of our partner or affinity associations, we may pass some of your personal information back to them (for example, policy details please note this can include special category data, claims, membership and suspected fraud and other financial crime information).

## Price comparison or other introductory services

If you get a quote on a price comparison website or other introductory service, the information you give them is passed to us so you don't need to re-enter your details. We'll also pass your personal information (for example, policy details please note this can include special category data, and suspected fraud and other financial crime information) back to them.

## Public information

We may use public information such as electoral roll, county court judgements and social media.

## Specialist services we use

We use other companies to provide some services for example banks and building societies, legal service providers, communication services, debt recovery agencies, marketing, fraud and other financial crime investigation services, and companies to help us find customers we have lost contact with. We'll give them the personal information they (or their sub-contractors) need to manage their service.

## Market research agencies

We may share your personal information with market research agencies who will conduct market research and business analysis on our behalf.

## Reinsurers and reinsurance brokers

We may need to share any personal information, including policy, claims, medical, and suspected fraud and other financial crime information, with our reinsurers and reinsurance brokers. Reinsurers provide insurance policies to insurance companies. Insurance companies engage a reinsurance broker to advise and assist in arranging a re-insurance policy.

## Other insured parties

An insured party on your policy or product may notify us of an incident or claim against your policy.

## Law enforcement and government agencies

Information may be given to us by law enforcement agencies (for example, the police) which may affect a policy or on-going claim.

## Giving someone permission to talk to us

We can only talk about your policy to you or someone we're satisfied that you've authorised to talk to us, on your behalf.

## Communications

When you contact us, personal information that you give us will be recorded. This helps us improve our customer service, train our staff, respond to complaints and prevent fraud and other financial crime.

All communications will be in English. You can get this document from us in writing, Braille, large print or an audible format by contacting us.

## Cookies

We use cookies to give you the best possible experience online - but we don't store contact details or banking information. Visit our cookie policy page on our website to find out more and how to change your cookie settings.

## How long we keep personal information

We will retain your personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include:

- the length of time we have an on-going relationship with you and provide services to you;
- whether there is a legal obligation to which we are subject;
- whether retention is advisable in light of our legal position (such as in regard to complaints, litigation, or regulatory investigations).

## Your personal information rights

You have a right in certain circumstances to:

- **access** the personal information we hold about you;
- **correct** personal information;
- have your personal information **deleted**;
- **restrict** us processing your personal information;
- receive your personal information in a **portable** format;
- **object** to us processing your personal information.

You can also ask for a person to review an automated decision.

If you want to find out more or to exercise these rights, please contact us:

Data Access Team , LV=, County Gates, Bournemouth, BH1 2NF or email us at: [Dataaccess@lv.com](mailto:Dataaccess@lv.com)

We'll only send you marketing information about our products and services if you've given us consent.

You can withdraw your consent at any time.

## Your right to make a complaint

If you have a complaint about the way we process your personal data please contact us.

You can also raise your complaint with the Information Commissioner's Office on 0303 123 1113 or visit [ico.org.uk/concerns](https://ico.org.uk/concerns).

You can get this and other documents from us in Braille or large print by contacting us.

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