

Home Insurance Important Information

Please read this and keep it for reference.

Important Information about first direct

About our insurance services to you

first direct is a division of HSBC UK Bank plc. HSBC UK Bank plc is registered in England No. 9928412. Registered office: 1 Centenary Square, Birmingham B1 BHQ.

Who regulates us?

The Financial Conduct Authority (“FCA”) is the independent watchdog that regulates financial services, including insurance. We are authorised by the Prudential Regulatory Authority (“PRA”) and regulated by the PRA and the FCA as an insurance intermediary.

We are registered on the Financial Services Register as: HSBC UK Bank plc under registration no. 765112.

You can check this on the Financial Services Register by visiting the Financial Conduct Authority website: www.register.fca.org.uk.

Who do we act for?

We are permitted by Aviva Insurance Limited (“Aviva”) to promote, sell and service **first direct** Home Insurance policies (“policy”) as an insurance intermediary.

Whose products do we offer?

We only offer Home insurance underwritten by Aviva.

Which services will we provide you with?

If you purchase your policy by telephone or online, you will not receive advice or a personal recommendation from us.

We will help you make the right choice by asking some questions to narrow down the selection of cover options and provide information relevant to your demands and needs. You will then need to make your own choice about how to proceed.

What will you have to pay us for our services?

No fee has been charged by HSBC UK Bank plc for arranging this policy. HSBC UK Bank plc receives a commission from Aviva in relation to any policy we promote, sell and service, which means that a percentage of the premium you pay is given to us. We may also receive additional commission from Aviva dependent on the performance of our insurance business with Aviva.

Ownership

first direct is a division of HSBC UK Bank plc. HSBC Bank plc and HSBC UK Bank plc are members of the HSBC Group, the ultimate parent company of which is HSBC Holdings plc. HSBC Holdings plc beneficially holds 100% of both the shares and voting power of HSBC Bank plc and HSBC UK Bank plc.

What to do if you have a complaint about first direct?

Every effort is made to ensure that high standards of service are maintained. However, if you need to bring any matter concerning your insurance to **first direct's** attention or wish to register a complaint about **first direct**, please call **first direct** Customer Services on **0345 300 6031** or write to:

first direct Customer Care Team
Customer Services Centre
PO Box 7463
Pitheavlis
Perth
PH2 0YX

To help us continually improve our service, and in the interests of security, your communications may be monitored and/or recorded. Following the complaints procedure does not affect your right to take legal action.

If you cannot settle your complaint with us, you may be entitled to refer it to the Financial Ombudsman Service ("FOS"). Further information is available by contacting them on 0800 023 4567 or by visiting their website on: www.financial-ombudsman.org.uk

Is first direct covered by the financial services compensation scheme (FSCS)?

first direct is a division of HSBC UK Bank plc. HSBC UK Bank plc's obligations are covered by the Financial Services Compensation Scheme (FSCS). If we were unable to meet our obligations, you could be entitled to compensation from this scheme, depending on the type of insurance and the circumstances at the time.

Further information about compensation scheme arrangements is available on the FSCS website: www.fscs.org.uk or telephone 0800 678 1100.

Change of insurer(s)

We may from time to time use a different insurer to provide you with this product. A change of insurer may take place at any time. We will notify you prior to any change of insurer and advise you of any change in the policy terms. You will have the opportunity to terminate this policy both before and after such a change becomes effective.

first direct Privacy Notice Overview

Who are the data controllers?

The data controllers responsible for the personal information collected for first direct Home Insurance are:

- **first direct**, a division of HSBC UK Bank plc, 40 Wakefield Road, Leeds, LS98 1FD. **first direct** will collect and use personal information about you during the promotion, sale and servicing 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. **first direct** is the data controller for this information which will be shared with Aviva as set out in its Privacy Notice.

- Aviva Insurance Limited (Aviva), as the underwriter of the Home Insurance product, 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 HSBC UK Bank plc, for, example, during the sale of the policy. Aviva Insurance Limited is the data controller in respect of your personal information that it has received from HSBC UK Bank plc as intermediary 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.

An overview of how we will collect your data and use your information

This privacy notice 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 full **first direct** Privacy Notice which you can obtain by visiting www.firstdirect.com/privacy or by writing to: **first direct**, 40 Wakefield Road, Leeds, LS98 1FD addressed 'for the attention of the DPO'.

Who we are

When we say 'we', we mean **first direct**, a division of HSBC UK Bank plc, registered in England and Wales number 9928412. Registered office 1 Centenary Square, Birmingham, B1 1HQ. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under registration no. 765112

The information we collect

We collect information about you from different places including:

- directly from you
- 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 policy, you'll need to direct them to the privacy notice and make sure they agree to us using it for the purposes set out in the privacy notice.

How we'll use your information

We'll use it to provide you with any products and services you've requested and other purposes including for example:

- to confirm your identity and address
- to understand how you use any other accounts, products or services that you hold with us

- to carry out your instructions
- to improve our products and services
- to offer you other services we believe may benefit you unless you've asked us not to.

We'll only use your information where we're allowed to by law, including for example, 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 carry out fraud and money laundering checks.

Who we can share your information with?

We will share your personal information with the insurer to enable them to underwrite 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 companies we work in partnership with and other HSBC Group members. We may also share your information with others outside of the HSBC group including regulators (e.g. the Financial Conduct Authority), insurers, other banks, brokers, agents as well as credit reference and fraud prevention agencies.

Sensitive information

If insurers require this, we or they may ask you to provide sensitive health information that they need for insurance purposes to enable them to underwrite your policy or process a claim. We will keep this information secure and process it in accordance with relevant laws and regulations.

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

For a fuller statement of your rights please see the full **first direct** Privacy Notice. You can view or download a copy by visiting www.firstdirect.com/privacy or you can ask us for a copy in branch.

More Information

If you'd like further information on anything we've said in this Privacy Notice, or to contact our Data Protection Officer, contact us at **first direct**, 40 Wakefield Road, Leeds, LS98 1FD addressed 'for the attention of the DPO'.

Important Information about Aviva

Please read the information below carefully and retain for your future reference. HSBC UK Bank plc (HSBC) acts as insurance intermediary for the purposes of **first direct** Home Insurance.

first direct are permitted by the underwriter(s) below to promote, sell and service **first direct** Home Insurance. **first direct** Home Insurance is underwritten by Aviva Insurance Limited.

This document tells you what information you need to give the underwriter(s) and tells you about how your policy will be managed. It also outlines some important details about your policy and explains how your personal information will be looked after.

Important Notice – Information we need to know about

You must take reasonable care to provide complete and accurate answers to the questions the insurer asks. Please read any assumptions carefully and confirm if they apply to your circumstances. If any of the information provided by you changes after you purchase your policy and during the period of your policy please provide the insurer with details.

If the information provided by you is not complete and accurate:

- the insurer may cancel your policy and refuse to pay any claim, or
- the insurer may not pay any claim in full, or
- the insurer may revise the premium and/or change any excess, or
- the extent of the cover may be affected.

first direct and the insurer recommend you keep a record (including copies of letters) of all information provided to the insurer for your future reference.

Aviva's Regulatory Status

We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. We are registered as Aviva Insurance Limited. Registered in Scotland, No. 2116. (Registered Office: Pitheavlis, Perth PH2 0NH) and our firm's reference number is 202153.

You may check this information and obtain further information about how the Financial Conduct Authority protect you by visiting www.fca.org.uk.

Making a claim

Should you need to make a claim under this policy, please contact us using the appropriate telephone number shown below:

- Claims helpline: **0345 300 6032**
- Personal legal and tax advice helpline: **0800 051 1716**
- Legal expenses helpline: **0800 051 1716**
- Home emergency helpline: **0345 300 0957**

In all cases, please quote your policy number.

How do I make a complaint to Aviva?

We hope that you will be very happy with the service that we provide. However, if for any reason you are unhappy with how we have handled your claim please call the Claims helpline on **0345 300 6032**.

If you have complained to us and we have been unable to resolve your complaint, you may be entitled to refer it to the Financial Ombudsman Service. Following the complaints procedure does not affect your right to take legal action. Please refer to your policy booklet for full details on the complaints procedure and postal addresses for written complaints.

Use of Language

Unless otherwise agreed, the contractual terms and conditions and other information relating to this contract will be in English.

How do I cancel the contract?

You have a statutory right to cancel your policy within 14 days of purchase or renewal (or from the day you receive your policy or renewal documents, if this is later).

If you cancel at any time before cover starts, we'll refund the premium you've paid.

If you cancel after your cover has started, we will reduce your refund to pay for the time you were covered.

To cancel your policy, please contact the customer services helpline on **0345 300 6031**.

Copy of document availability

If you would like to receive copies of your policy documents in paper, please contact first direct. Copies will be provided free of charge.

Aviva Privacy Notice

Aviva Privacy Notice

In this section "we", "us" or "our" means Aviva Insurance Limited.

We collect and use personal information about you so that we can provide you with a policy that suits your insurance needs. This notice explains the most important aspects of how we use your information but you can get more information about the terms we use and view our full privacy policy at www.aviva.co.uk/privacypolicy or request a copy by writing to us at Aviva, Freepost, Mailing Exclusion Team, Unit 5, Wanlip Road Ind Est, Syston, Leicester LE7 1PD.

Personal information Aviva collects and how we will use it

Aviva will use your personal information: -

- to provide you with insurance: we need this to decide if we can offer insurance to you and if so on what terms and to also handle any claims,
- to support legitimate interests that we have as a business: we need this to manage arrangements we have with reinsurers, for the detection and prevention of fraud and to help us better understand our customers and improve our customer engagement (this includes customer analytics and profiling),
- to meet any applicable legal or regulatory obligations: we need this to meet compliance requirements with our regulators (e.g. Financial Conduct Authority), to comply with law enforcement and to manage legal claims; and
- to carry out other activities that are in the public interest: for example, we may need to use personal information to carry out anti-money laundering checks.

Aviva may also use personal information about other people, for example family members you wish to insure on a policy. If you are providing information about another person we expect you to ensure that they know you are doing so. You might find it helpful to show them this privacy notice.

The personal information we collect and use will include name, address, date of birth, and financial information and details of your home. If a claim is made Aviva will also collect personal information about the claim from you and any relevant third parties. We may also need to ask for details relating to the health or any unspent offences or criminal convictions of you or somebody else covered under your policy. We recognise that information about health and offences or criminal convictions is particularly sensitive information. We'll ensure that we only use that information where we need to for our insurance purposes (including assessing the terms of your insurance contract, dealing with changes to your policy and/or dealing with claims).

If Aviva need your consent to use personal information, we will make this clear to you when you complete an application or submit a claim. If you give Aviva consent to using personal information, you are free to withdraw this at any time by contacting them in one of the ways described below. Please note that if consent to use information is withdrawn, we may not be able to continue to provide the policy or process claims and we may need to cancel the policy.

Of course, you don't have to provide us with any personal information, but if you don't provide the information, we need we may not be able to proceed with your application or any claim you make.

Some of the information we collect as part of this application may be provided to us by a third-party including HSBC UK Bank plc. This may include information already held about you within the Aviva group, including details from previous quotes and claims, information obtained from publicly available records, Aviva's trusted third parties and from industry databases, including fraud prevention agencies and databases.

Credit Reference Agency Searches

To ensure Aviva has the necessary facts to assess your insurance risk, verify your identity, help prevent fraud and provide you with our best premium and payment options, Aviva may need to obtain information relating to you at quotation, renewal and in certain circumstances where policy amendments are requested. Aviva or its agents may undertake checks against publicly available information (such as electoral roll, county court judgments, bankruptcy orders or repossessions(s)). Similar checks may be made when assessing claims.

The identity of our Credit Reference Agency and the ways in which they use and share personal information, are explained in more detail at www.transunion.co.uk/crain

Automated decision making

We carry out automated decision making to decide whether we can provide insurance to you and on what terms. In particular, we use an automated underwriting engine to process the personal information you provide as part of this application process. This will include information such as your age as well as details of your property including address and postcode. The automated engine may validate the information you provide against other records we hold about you in our systems and third-party databases, including public databases. We may also supplement the information you provide us with information from third parties who can provide more information about your property (for example through land registers and commercially available property databases).

We do this to calculate the insurance risk and how much the cover will cost you. Without this information we are unable to provide a price that is relevant to your individual circumstances and needs. We regularly check the way our underwriting engine works to ensure we are being fair to our customers.

After the automatic decision has been made, you have the right to speak to someone who may review the decision and provide a more detailed explanation. If you wish to invoke this right please contact us at dataprt@aviva.com or call us on 0800 277 377.

How we share your personal information with others

Aviva may share your personal information: -

- With the Aviva group, our agents and third parties who provide services to us, HSBC UK Bank plc and other insurers (either directly or via those acting for the insurer such as loss adjusters or investigators) to help us administer our products and services;
- With regulatory bodies and law enforcement bodies, including the police, e.g. if we are required to do so to comply with a relevant legal or regulatory obligation;
- With other organisations including insurers, public bodies and the police (either directly or using shared databases) for fraud prevention and detection purposes;
- With reinsurers who provide reinsurance services to Aviva and for each other. Reinsurers will use your data to decide whether to provide reinsurance cover, assess and deal with reinsurance claims and to meet legal obligations. They will keep your data for the period necessary for these purposes and may need to disclose it to other companies within their group, their agents and third party service providers, law enforcement and regulatory bodies.

Some of the organisations Aviva share information with may be located outside of the European Economic Area (“EEA”). We will always take steps to ensure that any transfer of information outside of Europe is carefully managed to protect your privacy rights. For more information on this please see Aviva’s Privacy Policy or contact us in one of the ways described below.

How long we keep your personal information for

Aviva maintain a retention policy to ensure we only keep personal information for as long as we reasonably need it for the purposes explained in this notice. Aviva need to keep information for the period necessary to process your insurance and deal with claims and queries on your policy. Aviva may also need to keep information after our relationship with you has ended, for example to ensure we have an accurate record in the event of any complaints or challenges, carry out relevant fraud checks, or where we are required to do so for legal, regulatory or tax purposes.

Your rights

You have various rights in relation to your personal information, including the right to request access to your personal information, correct any mistakes on our records, erase or restrict records where we are no longer required, object to use of personal information based on legitimate business interests, ask not to be subject to automated decision making if the decision produces legal or other significant effects on you, and data portability. For more details in relation to your rights, including how to exercise them, please see the full privacy policy for Aviva Insurance Limited, which can be obtained in the way described above.

Contacting us

If you have any questions about how Aviva use personal information, or if you want to exercise your rights stated above, please contact our Data Protection Officer by either emailing them at: DATAPRT@aviva.com or writing to them at Aviva, Level 5 Pitheavlis, Perth. PH2 0NH.

If you have a complaint or concern about how Aviva use your personal information, please contact us in the ways described above in the first instance and we will attempt to resolve the issue as soon as possible. You also have the right to lodge a complaint with the Information Commissioners Office at any time.

Fraud Prevention and Detection

In order to prevent and detect fraud we and the insurer may at any time:

- share information about you with other organisations and public bodies including the Police;
- undertake credit searches and additional fraud searches;
- check and/or file your details with fraud prevention agencies and databases, and if you give us false or inaccurate information and we and the insurer suspect fraud, we and the insurer will record this to prevent fraud and money laundering.

We and the insurer can supply on request further details of the agencies and databases we access or contribute to and how this information may be used. If you require further details contact: Policy Investigation Unit, Aviva, PO Box 121, Surrey Street, Norwich, NR1 3ZH. Telephone 0345 300 0597. Email: PIUUKDI@AVIVA.COM

We the insurer and other organisations may also search these agencies and databases to:

- help make decisions about the provision and administration of insurance, credit and related services for you and members of your household;
- trace debtors or beneficiaries, recover debt, prevent fraud and to manage your accounts or insurance policies;
- check your identity to prevent money laundering, unless you furnish us with other satisfactory proof of identity;
- check details of job applicants and employees.

The Use of Third-Party Information

In assessing your application now or at renewal, to prevent fraud, check your identity and to maintain our policy records, HSBC UK Bank plc and the insurers may:

- search publicly available files provided by credit reference agencies. The insurer may use a number of factors to provide you with a quote for your insurance including publicly available information such as electoral roll, County Court Judgments and bankruptcies which they obtain from credit reference agencies.

A record of this search will be visible to you if you request your credit report and also to any other organisation undertaking a search for the same purpose i.e. General Insurance related. This search will appear on your credit report as a “General Insurance (non-credit)” search. Each lender may have its own criteria in establishing how and whether any such search impacts its decision-making process.

- use information relating to you and your home supplied to us by other third parties.

Claims History

- Under the conditions of your policy you must tell us about any insurance related incidents (such as fire, water damage, theft or an accident) whether or not they give rise to a claim. When you tell the insurer about an incident they will pass information relating to it to a database.
- The insurer may search these databases when you apply for insurance, in the event of any incident or claim, or at any time of renewal to validate your claims history or that of any other person or property likely to be involved in the policy or claim.

You should show these notices to anyone who has an interest in the property under the policy.

Renewing your insurance

We will contact you in writing at least 21 days before your renewal date and will either:

- (a) give you an opportunity to renew your insurance for a further year; or
- (b) let you know that we are unable to renew your insurance.

If we don't offer renewal we will tell you why, for example:

- the product is no longer available;
- we reasonably suspect fraud;
- your claims history is poor;
- we have changed our eligibility criteria;
- you no longer meet our eligibility criteria; or
- you have not taken reasonable care to provide complete and accurate answers to the questions we ask.

If we offer renewal we will tell you:

- about any changes we are making to your policy terms and conditions;
- to check this insurance continues to meet your needs;
- to check that the information we have is still correct; and
- next year's price.

If you wish to make any changes at renewal, please contact the customer services helpline on **0345 300 6031**.

You can cancel your policy at any time. Please see the General Conditions in your policy booklet.

Ensuring you have continuous cover

If you are thinking of cancelling or not renewing with us, make sure you can get the alternative cover you need before your policy ends.

Automatic renewal of your policy

We will contact you at least 21 days before your renewal date.

Where we offer you renewal terms and you have chosen to automatically renew your policy will be automatically renewed and the renewal premium will be collected by your chosen payment method.

You can opt in* or opt out of automatic renewal free of charge at any time by:

- visiting aviva.co.uk/firstdirect/contact
- calling 03 453 006 031
- writing to First Direct Insurance, Business Support, PO Box 7463, Perth, PH2 0YX

*Opting in to automatic renewal may not be available in certain circumstances.

We will not automatically renew your policy if:

- you have chosen a payment method that doesn't offer automatic renewal.
- you have opted out of your automatic renewal.
- you have a poor payment or credit history.

If any of the above happens you will receive a renewal letter providing you with options on how to renew your policy and avoid being left without cover.

Legal Procedure

The law of England and Wales will apply to this contract unless:

1. you and the Insurer agree otherwise; or
2. at the date of the contract you are resident of Scotland, Northern Ireland, the Channel Islands or the Isle of Man, in which case (in the absence of agreement to the contrary) the law of that country will apply.

Telephone call charges and recording

Calls to 0800 numbers from UK landlines and mobiles are free. The cost of calls to 03 prefixed numbers are charged at national call rates (charges may vary dependent on your network provider) and are usually included in inclusive minute plans from landlines and mobiles. For our joint protection telephone calls may be recorded and/or monitored.

Would I receive compensation if Aviva were unable to meet its liabilities?

Aviva are protected by the Financial Services Compensation Scheme (FSCS). You may be entitled to compensation from this scheme if we cannot meet our obligations, depending on the type of insurance and the circumstances of your claim.

You can get this in large print, audio and Braille by calling
0345 300 5898 (via Text Relay if appropriate).

firstdirect.com

Issued by **first direct**, a division of HSBC UK Bank plc, registered in England and Wales number 9928412.
Registered Office: 1 Centenary Square, Birmingham, B1 1HQ. This insurance is underwritten by Aviva Insurance Limited
Registered in Scotland, No. 2116. Registered Office: Pitheavlis, Perth PH2 0NH.
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