

Single Trip and Annual Multi-trip Travel Insurance

Important Information

Travel Insurance Important Information

Please read this information carefully and keep it for your future reference. A policy booklet will be issued when you take out a policy; you can also view or download the full policy wording online at firstdirect.com.

Important Information about first direct

Explaining first direct's service

Your travel insurance policy is provided by Aviva Insurance Limited. As an insurance intermediary **first direct** deals exclusively with Aviva for the purposes of your policy. Aviva will deal with the administration of your insurance (including claims).

You will not receive advice or recommendations from **first direct** on this arrangement. No fee has been charged by **first direct** for arranging this contract.

first direct is a division of HSBC UK Bank plc. HSBC UK Bank plc is registered in England and Wales number 9928412. Registered Office: 1 Centenary Square, Birmingham, B1 1HQ.

HSBC receives a commission from Aviva in relation to any insurance policy we arrange, which means that a percentage of the premium you pay is given to HSBC. In addition to this we may also receive additional commission dependent on the performance of our insurance business with Aviva.

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.

Who regulates first direct?

first direct is a division of HSBC UK Bank plc which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Its reference number is 765112. Its permitted business is advising on and arranging insurance contracts. You can check this on the Financial Services Register by visiting the Financial Conduct Authority website www.fca.org.uk

What to do if you have a complaint about first direct

If you have a complaint, we'd like you to resolve it with us in the first instance. But if you're not happy with the way we handle your complaint, or its outcome, you can complain to the Financial Ombudsman Service, the details of how to contact them are below.

Raising your concerns with us

You can contact us:

By phone: from the UK **03 456 100 100**[†]

[†]Text-phone **03 456 100 147** or if calling from abroad +44 113 234 5678 (Text Relay +44 151 494 1260).

Because we want to make sure we're doing a good job calls may be monitored and/or recorded, we hope you don't mind.

Via Online Banking send us a message via Online Banking. Select 'contact us', 'secure message' 'make a complaint'.

In writing: Customer Relations
first direct
40 Wakefield Road
Leeds
LS98 1FD

Where we can, we'll give you an answer there and then. If we can't do that, we will fully investigate all the issues raised and try to resolve your concerns as quickly as possible, by phone, secure message or in writing. Depending on the nature of your complaint, we may not be able to resolve it as quickly as we would like to, if this is the case, we will keep you updated of our progress.

Our aim is to resolve all your concerns here at **first direct**. However, if you're not satisfied with the outcome, or if eight weeks have passed since you first raised your complaint with us, you have the right to refer your complaint to the Financial Ombudsman Service.

In writing: Financial Ombudsman Service
Exchange Tower
London
E14 9SR

By phone: 0800 023 4567
0300 123 9 123

By email: complaint.info@financial-ombudsman.org.uk
(or simply log- on to their website at www.financial-ombudsman.org.uk)

Following the complaints procedure does not affect your right to take legal action.

Is first direct covered by the Financial Services Compensation Scheme (FSCS)?

first direct is a division of HSBC UK Bank plc who are covered by the FSCS and you may be entitled to compensation from the scheme if it cannot meet its obligations.

This depends on the type of business and the circumstances of the claim. Insurance advising and arranging is covered for 90% of the claim with no upper limit. Further information about compensation scheme arrangements is available from the FSCS.

Change of insurer

first direct may from time to time use a different insurer(s) to provide you with this product. A change of insurer(s) may take place upon the renewal date of your policy or at any other time. **first direct** will notify you prior to any change of insurer(s) 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.

Marketing

With your permission, the HSBC Group may exchange, use, analyse and assess relevant information about your relationships with the HSBC Group, including the nature of your transactions, to give you information about products (including mortgages) and services available from HSBC Group companies and those of selected third parties which may interest you by telephone, post, email, secure e-messaging, text messaging services and other means.

If you do not want members of the HSBC Group to contact you about products and services which we think may be relevant to you, please contact **first direct** on **03 456 100 100**.

Important Information About Your Policy

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 when you take out, make changes to, and renew your policy. Please tell the insurer immediately if there are any changes to the information set out in the Information Provided By You, Demands and Needs Statement or on your schedule. You must also tell the insurer immediately about the following changes:

- any change to your health or the health of anyone else the trip depends on (eg a travelling companion, or a close relative, even if they are not travelling with you). Please see the Medical Declaration section of your policy
- you are travelling to a country that is not included in the area covered under your policy, other than refuelling stops that do not include an overnight stay
- you are planning a trip that is over the trip duration as shown on your policy schedule.

If you are in any doubt please call the insurer on **03 450 308 718**. When you inform them of a change, they will inform you if this affects your policy, for example whether they can accept the change and if so whether the change will result in revised terms and/or premium being applied. If the information provided by you is not complete and accurate, the insurer may:

- revise the premium and/or amend the medical underwriting decision(s) for any declared Pre Existing Condition(s) which may result in an accepted condition being excluded, or
- cancel your policy and refuse to pay any claim, or
- not pay any claim in full.

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.

Renewing your insurance

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

1. Give you an opportunity to renew your insurance for a further year and tell you:
 - about any changes they are making to the terms and conditions of your policy;
 - to review your circumstances and consider whether this insurance continues to meet your needs;
 - to check that the information you have provided them with is still correct, and tell them if anything has changed; and
 - the price for the next year.

If you wish to make changes at renewal please call the insurer on **03 450 308 718**.

Or

2. Let you know that they are unable to renew your insurance. Reasons why this may happen include, but are not limited to, the following:
 - when the product is no longer available; or

- when they are no longer prepared to offer you insurance for reasons such as:
 - they reasonably suspect fraud
 - your claims history
 - they have changed their acceptance criteria; and/or
 - you are no longer eligible for cover.

A cooling off period (14 days from renewal of the contract or the day on which you receive your renewal documentation, whichever is the later) applies at the renewal of your insurance. Please read 'Your cancellation rights' in your policy booklet which explains how this works.

Continuous Renewal Payment Authority – eg Credit/Debit Cards

Where the insurer has offered you renewal terms and you select or have selected a continuous premium payment method, you will be notified in writing at least 21 days before your renewal date that the policy will automatically be renewed and the renewal premium will again be collected from your specified bank account or credit/debit card.

The insurer will not automatically renew your policy if you have contacted them to cancel your continuous payment authority since your last renewal. If this is the case they will advise you in your renewal letter and you will need to contact them to make payment before they can renew your policy.

Use of Language

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

Data Protection

The data controllers responsible for the personal information in this notice are:

- Aviva Insurance Limited (Aviva), as the insurer of the Travel 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 **first direct**, 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 **first direct** as distributor and also in respect of any information that it has collected directly from you or from other sources as set out in its Privacy Notice
- **first direct**, a division of HSBC UK Bank plc, 40 Wakefield Road, Leeds LS98 1FD is responsible for the promotion and distribution of the Travel Insurance product. **first direct** will collect and use personal information about you during the promotion and sale of the product which may be provided by you but could also include information that we have previously collected about you, eg 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.

first direct Privacy Notice

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

Please read an overview of our Privacy Notice below. You can access the full privacy notice here www.firstdirect.com/privacy or by writing to: 40 Wakefield Road, Leeds LS98 1FD.

This provides an overview of:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure.

We'll also explain your rights to your information. This is just an overview of some key points. A full description is contained in the privacy notice which you can obtain by visiting www.firstdirect.com/privacy or by writing to: 40 Wakefield Road, Leeds LS98 1FD.

Who we are

When we say 'we', we mean **first direct**, which is a division of HSBC UK Bank plc and part of the HSBC group of companies, 40 Wakefield Road, Leeds LS98 1FD who is the 'data controller' for the information in this overview. This means we're responsible for deciding how we can use your information.

The information we collect

We collect information about you from different places including:

- directly from you
- from a third party acting on your behalf eg an intermediary or broker
- from other HSBC companies
- 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 you hold with us accounts
- 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 as carry out fraud and money laundering checks.

Who we can share your information with

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 (eg the Financial Conduct Authority), insurers, other banks, brokers, agents as well as credit reference and fraud prevention agencies.

Sensitive information

When you apply for insurance, you may need to give us sensitive health information if the insurer needs this to give you a quote. We will keep this information secure and process it in accordance with relevant laws and regulations. Where appropriate, we will ask for consent to collect and use this information.

How long we'll keep your information

We'll keep your information for as long as you have a relationship with us. After it ends we'll keep it where we may need it for our legitimate purposes, to help us respond to queries or complaints, or for other legal and regulatory reasons, including for example, fighting fraud and financial crime and responding to requests from regulators.

Transferring your information overseas

Your information may be transferred and stored in countries outside the European Economic Area (EEA), including some that may not have laws offering the same level of protection for personal information. When we do this, we'll ensure an appropriate level of protection is maintained.

Your rights

You have a number of rights relating to your information eg 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 and how to complain if you're unhappy with anything you think we are doing, please see the full privacy notice.

More information

If you'd like more details about anything covered in this summary, please see our full Privacy Notice you can view or download a copy by visiting www.firstdirect.com/privacy or if you prefer paper, give us a call on **03 456 100 100** and we'll send you one in the post.

Aviva Privacy Notice

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

This notice explains the most important aspects of how Aviva use your information but you can get more information about the terms used and view the full privacy policy at: www.aviva.co.uk/privacypolicy or request a copy by writing to: 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 also to administer your policy, handle any claims and process renewals,
- 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 them better understand their customers and improve their customer engagement (this includes, customer analytics and profiling),
- to meet any applicable legal or regulatory obligations: we need this to meet compliance requirements with their regulators (eg 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.

As well as collecting personal information about you, 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 Aviva expect you to ensure that we know you are doing so and are content with their information being provided to them. You might find it helpful to show them this privacy notice and if we have any concerns please contact Aviva in one of the ways described below.

The personal information we collect and use will include name, address, date of birth, and financial information. 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. Where appropriate, we will ask for consent to collect and use this information.

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 **first direct**. 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.

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, address, age and any medical conditions of the policyholder and any other travellers. The automated engine may validate the information you provide against third party databases, including public 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 **03 450 308 719**.

How we share your personal information with others

Aviva may share your personal information:

- with the Aviva group, their agents and third parties who provide services to them, **first direct** and other insurers (either directly or via those acting for the Aviva such as travel administration companies, loss adjusters or investigators) to help Aviva administer their products and services
- with regulatory bodies and law enforcement bodies, including the police, eg 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. We 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 administer 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 4 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 **first direct** and the insurer may at any time share information about you with other organisations and public bodies including the police.

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

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. To help us continually improve our service, and in the interests of security, we may monitor and/or record your calls with us.

Choice of Law

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

- you and the insurer agree otherwise; or
- at the date of the contract you are a resident of (or, in the case of a business, the registered office or principal place of business is situated in) Scotland or Northern Ireland, in which case (in the absence of agreement to the contrary) the law of that country will apply.

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. 21 16. (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.

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 it, we would like to hear from you. In the first instance, please contact us as follows:

- If your complaint is regarding this insurance please call the Aviva Customer Services helpline on **03 450 308 718**
- If your complaint is regarding a claim please call the Claims helpline on **01603 605125**

Aviva services falls within the scope of the Financial Ombudsman Service. If you have complained to us and we have been unable to resolve your complaint, you may be entitled to refer it to this independent body. 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.

If you have taken a product out with us online or by telephone, you can also use the European Commission's Online Dispute Resolution (<http://ec.europa.eu/odr>) service to make a complaint. The purpose of this platform is to identify a suitable Alternative Dispute Resolution (ADR) provider and we expect that this will be the Financial Ombudsman Service. Please be aware that the Financial Ombudsman Service will only be able to consider your complaint after we have had the opportunity to consider and resolve it.

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.

first direct

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03 450 308 718 (via Text Relay if appropriate).

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Member HSBC  *Group*