This Privacy Policy tells you what data we collect, why we collect it and what we do with it. You can also find information on the controls you have to manage your data within these pages.

This privacy policy applies to both AXA Insurance UK and AXA Health*

Entity: AXA UK Plc
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Contents

*companies included noted in Section 11

The AXA UK Group includes insurance companies, insurance brokers and health and wellbeing companies. We are all committed to ensuring your privacy and personal information is protected. If you were referred to this Privacy Policy from an AXA UK company website or document (for example, your insurance policy) the website or document will set out details of the AXA company that is processing your personal information; it is the data controller of your personal information and is responsible for complying with data protection laws. For the purposes of this Privacy Policy, references to "**we**" or "**us**" shall refer to that AXA company. Our Health Services function (psychological services, musculoskeletal services and Wellbeing services); and PPP Taking Care Limited (which provides technology enabled care and support) have their own separate Privacy Policies. See further details in the AXA UK Company Details section.

Please bring this Privacy Policy to the attention of anyone where you are acting on their behalf.

By providing your personal information or the personal information of someone else, you acknowledge that we may use it in the ways set out in this Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

From time to time we may need to make changes to this Privacy Policy, for example, as the result of changes we make to the way we process personal data, government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check our website periodically to view the most up to date Privacy Policy.

1. Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below.

Our Privacy Principles

1. Personal information you provide is processed fairly, lawfully and in a transparent manner
2. Personal information you provide is collected for a specific purpose and is not processed in a way which is incompatible with the purpose for which AXA collected it
3. Your personal information is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
4. Your personal information is kept accurate and, where necessary kept up to date
5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed
6. We will take appropriate steps to keep your personal information secure
7. Your personal information is processed in accordance with your rights
8. We will only transfer your personal information to another country or an international organisation outside the United Kingdom or those countries considered "adequate" by the UK regulator (such as those within the European Economic Area or EEA) where we have taken the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards and performing appropriate risk assessments of those transfers
9. AXA UK and AXA Group companies do not sell your personal information and we also do not permit the selling of customer data by any companies who provide a service to us

2. How do we collect your personal information?

Whilst there are a number of ways in which we collect your personal information, the two main ways we collect personal information about you are from things you tell us yourself, and from things we ask other people or organisations to share with us. Things you tell us could include information that you provide during conversations we have on the phone, what you've written on an application form or if you post something on one of our forums. We might also collect information about you from other people and organisations, such as healthcare professionals and Credit Reference Agencies, or by checking databases, such as the electoral register. Please see below for a list of ways we collect your personal information:

We may collect personal information directly from you:

- via enquiry, registration and claim forms, live chat and virtual assistant platforms;
- via feedback forms and forums;
- when you purchase or use any of our products or services;
- when you fill out a survey, or vote in a poll on our website;
- through quotes and application forms;
- via cookies. You can find out more about this in our cookies policy;
- via our telephone calls with you, which may be recorded* and this may include logging your telephone number, date, time and duration of the call;
- when you provide your details to us either online or offline; and
- when you provide a service to us or our customers (as a supplier).

* We mostly record calls to review whether we are meeting our own and our regulators' standards, to help us investigate any concern you express about our dealings with you and to help identify and investigate fraud. If at any time you do not want a call recorded you can ask us about not doing this. We may agree to this in limited circumstances, in which case we will need to call you back from an unrecorded line. If you are calling to talk about buying, using or cancelling a product or service we will not offer this.

We may collect your personal information from a number of different sources including:

- directly from an individual or employer (or your employer's service provider) who has a policy with us under which you are insured, for example you are a named driver on your partner's motor insurance policy;
- directly from an employer which funds a Healthcare Trust that we administer where you are a beneficiary;
- from Credit Reference Agencies who will supply us with information, including information from the Electoral Register and credit information. Please note that the agencies may record details of the search whether or not your application proceeds;
- from websites where you may leave reviews about us e.g. Trustpilot;
- from social media:

  - in particular when fraud is suspected;
  - via a third party which collates public opinion about AXA from social media; and
- Other third parties including:
  - your family members when they make enquiries about purchasing a product for you or including you on their insurance, when you ask them to make a claim on your behalf, or where you may be incapacitated or otherwise unable to provide information yourself when we need it;
  - medical professionals and hospitals;
  - other AXA UK Group companies;
  - aggregators (such as price comparison websites);
  - your Insurance Broker if you have one;
  - partners who provide our policies directly to you;
  - third party service providers;
  - third parties who assist us in checking that claims are eligible for payment;
  - third parties who assist us in investigating fraud, including obtaining information data from Credit Reference Agencies;
  - third parties such as companies who provide consumer classification and other personal data for marketing purposes e.g. market segmentation and lifestyle data;
  - third parties, including corporate partners (such as Lloyds Banking Group plc), who provide information which may be used by AXA to inform its risk selection, pricing and underwriting decisions; and
  - in the case of where your employer provides vehicles for business purposes we may obtain relevant information about your driving via technology such as a driving application.

3. What personal information do we collect?

We might collect personal information, such as your contact details, information about your bank or credit cards. The information we collect depends on which products or services you're interested in, or we think you may be interested in; for example; if you are interested in obtaining car or travel insurance, we'll collect information about the car you drive or where you're planning to travel to and for medical insurance, we may ask you about you or your family's medical history. Please note, in certain circumstances we may request and/or receive "sensitive" personal information about you. For example, we may need access to some of your health records for the purposes of providing you with a policy or processing claims, or details of any court or HMRC judgments for the purposes of preventing, detecting and investigating fraud. Please see below for a more detailed list of personal information we collect.

The information that we collect will depend on our relationship with you. If we need information about other people named on your policy, we may ask you to provide the information below in relation to those people too, if this is relevant to your insurance. For completeness, when we refer to "sensitive personal information", we include both Special Category Personal Data and Criminal Conviction Data.

Where AXA Insurance UK Plc is the data controller of your personal information, we may collect the following about you:

- Personal information
    - contact details such as name, email address, postal address and telephone numbers including any telephone number collected by our telephone system when you call us
    - details of any other persons included on the policy where they are named on your policy and the relationship to you as policyholder
    - identification information such as your date of birth, national insurance number, passport and driving licence
    - financial information such as bank details, credit card details and information obtained as a result of any credit checks, bankruptcies and other financial information such as county court judgments or HMRC investigations
    - where applicable, details of any vulnerabilities in customers' personal circumstances identified and the support offered
    - information relevant to your insurance policy such as details about your vehicle, property, previous policies or claims, recent damage.
    - Information from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level where you are a telematics insurance policy holder.

    - information relevant to your claim or your involvement in the matter giving rise to a claim, video surveillance and tracking technology, such as dashcam footage where appropriate, CCTV or Automatic Number Plate Recognition “ANPR” (number plate recognition technology)
    - information about the nature of your business and commercial assets
    - where applicable, if you are an existing customer of our corporate partners (such as Lloyds Banking Group plc), a relationship score (or similar) provided to us by that corporate partner which is taken from information about the products you hold with them
    - information obtained through our use of cookies. You can find out more about this in our cookies policy
    - your marketing preferences
    - information collected from your device(s) including IP address, device information (e.g. device type, operating system) and browser

- Sensitive personal information
    - details of your current or former physical or mental health or condition
    - details regarding criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions)

Where an AXA Health company is the data controller of your personal information, we may collect the following information about you:

- Personal information
    - contact details such as name, email address, postal address and telephone numbers including any telephone number collected by our telephone system when you call us
    - nationality and/or country of residence
    - the relationship of you to other people associated with you in our records, for example, partner, parent, child and the gender you identify as
    - lifestyle and social circumstances, for example; your interests, such as whether you play a sport, your housing status and number of dependents
    - identification information such as your date of birth, national insurance number, passport, crime identification number and driving licence
    - financial information such as bank details, credit card details and information obtained as a result of any credit checks, bankruptcies and other financial information such as county court judgments
    - where applicable, details of any vulnerabilities in customers’ personal circumstances identified and the support offered
    - employment details such as name of any employer and work location
    - information obtained through our use of cookies. You can find out more about this in our cookies policy
    - information relevant to your claim or your involvement in the matter giving rise to a claim

- information about the goods and services you have with AXA and your use of them.
- information about the goods and services you have provided to us (if you are a supplier)
- your marketing preferences
- information collected from your device(s) including IP address, device information (e.g. device type, operating system) and browser

- Sensitive personal information
    - details of your current or former physical or mental health or condition
    - details concerning sexual life or sexual orientation (details not actively sought but could be provided by you or your healthcare professionals in support of a claim or when using our 24/7 support line)
    - details regarding criminal offences, including alleged offences, criminal proceedings, outcomes and sentences (previous criminal convictions)

4. How do we use your personal information?

We mainly use your personal information to provide you with an insurance policy, healthcare trust benefits and other services that you, your employer, or other family members obtain from us and to provide you with the right services based on your situation. So, for example, if you have a problem, we make sure the right network of providers and specialists are in place and we can also update you quickly on the progress and cost of your claim and keep you safe from fraud. However, there are a number of other reasons why we use your personal information; please see below for a more detailed list of how we use your personal information.

We may process your personal information for a number of different purposes, and these are set out in more detail in the below sub-sections for AXA Insurance and AXA Health where applicable. Under data protection laws we can only process your information where we have one or more legal ground or condition for doing so as set out in the law. We have set out below the main reasons why we process your personal information and the applicable circumstances when we will do so.

When the personal information we process about you is classed as sensitive personal information (criminal offences information and 'Special Category Personal Data' such as your health, sexual orientation and ethnic origin), we must have an additional legal condition for such processing, including the substantial public interest condition for the insurance industry or, where necessary, we will ask for your consent.

The substantial public interest condition for insurance is contained in the UK Data Protection Act 2018 and allows for processing special category personal data (including health data) and criminal conviction data which is necessary for an insurance purpose. This includes advising on, arranging, underwriting, administering, administering a claim under, exercising a right or complying with an obligation under, an insurance contract.

- Processing of personal and sensitive personal information is necessary in order for us to provide your insurance policy, benefits or other services, such as assessing your application and setting you up as a policyholder, or trust beneficiary, administering and managing your insurance policy or benefits, providing all related services, providing a quote, handling and paying claims and communicating with you. In these circumstances, if you do not provide such information, we may not be able to offer you a policy, service or process a claim.
- We may use Cloud (technology) storage solutions within the United Kingdom and Europe which are chosen to ensure efficiency and improved performance through up-to-date technology. In some instances, we may consider similar technology outside these areas or technical support provided may be from outside. In all cases where personal data is transferred to a country which is deemed not to have the same standards of protection for personal data as the UK, AXA will ensure

appropriate safeguards such as UK regulator approved Standard Contractual Clauses and further contractual, organisational and technical measures (as may be required following an assessment of the risk) have been implemented to ensure that your personal information is protected.

- Where we have a legal or regulatory obligation to use personal information, for example, when our regulators, the Prudential Regulatory Authority, (PRA), the Financial Conduct Authority (FCA) and our data protection regulator, the Information Commissioner's Office (ICO) wish us to maintain certain records of any dealings with you.
- Where we need to use your personal information to establish, exercise or defend our legal rights, for example when we are faced with any legal claim or where we want to pursue any legal claims ourselves.
- Where we need to use personal and sensitive information for reasons of public interest, such as investigating fraudulent policyholder applications or claims, including large scale/organised fraudulent claims, medical malpractice, anti-money laundering (AML), Counter-Terrorism Financing (CTF) & WLM (Watch List Management checks.
- Where you have provided your consent to our use of your personal information. We will usually only ask for your consent in relation to processing your sensitive personal information (such as health data) or when we would like to provide marketing information to you (including information about other products and services). We do not always need your consent to process your sensitive personal information, but where we do we will make this clear when you provide your personal information. Without your consent, in some circumstances, we may not be able to provide you with cover under a policy or handle a claim, or you may not be able to benefit from some of our services.
- Where we have appropriate legitimate business needs to use your personal information such as maintaining our business records, developing and improving our products and services, protecting our services and computer systems and ensuring our network and information security and business continuity, all whilst ensuring that such business need does not interfere with your rights and freedoms and does not cause you harm.
- When required, we anonymise personal information so that individuals cannot be identified, before we use it for management information and analysis of our products and services. Analysis of anonymous information provides us with insights about our business, and with opportunities to improve our products and services and the health and wellbeing of the people who use them. Analysis of anonymous information also allows us to demonstrate the value of the services we provide to our clients. The way that we anonymise personal information aligns with regulatory guidance and is achieved using different techniques, for example removing identifying data or overwriting it with randomised non-identifiable data. Anonymisation still constitutes use of your personal information and so to do so

lawfully, we rely on the legal ground that was used when your data was originally collected.

- Where we need to use your sensitive personal information such as health data because it is necessary for your vital interests, this being a life or death matter.

You will find details of the legal grounds we rely on for each use of your personal information below.

For AXA Insurance UK Plc

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing

To review your insurance application and provide you with a quote. More information on how we use your information to do this is available under Detail Section 7 below.	Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Credit information in order to prevent fraud check your identity, assess your creditworthiness, risk selection, pricing and underwriting. Information about your possessions such as your vehicle, your driving history; any information about your property, past claims, recent damage; information about your business premises (or vehicle). Information from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level where you are a telematics insurance policy holder. Information about the nature of your business and commercial assets. Sensitive personal information including any penalties you may have for driving offences.	Legal ground: such use is necessary in order to take steps to provide your insurance policy. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes.
To administer, provide and service your insurance policy, assess eligibility for and handling and paying claims.	Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees).	Legal grounds: such use is necessary in order to provide your insurance policy and we have a legitimate business need to use your personal information to administer your

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
More information on how we use your information to do this is available under Detail Section 7 below.	Information about your possessions such as your vehicle, your driving history, any information about your property, past claims, recent damage; information about your business premises (or vehicle). Information from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level where you are a telematics insurance policy holder. Information about the nature of your business and commercial assets. Financial details. Sensitive personal information about your physical or mental health or condition or any penalties you may have for driving offences.	insurance policy and handle any claims. Legal grounds for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes or you have provided your consent. Please note that, in some cases, if you do not provide your consent, we may not be able to pay claims.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
To communicate with you and resolve any complaints you may have. More information on how we use your information to do this is available under Detail Section 7 below.	Your contact details and any information relevant to your policy.	Legal grounds: such use is necessary in order to provide your insurance policy and we have a legitimate business need to resolve any complaints. Legal grounds for sensitive personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights, where you have provided your consent, or the processing is necessary in the substantial public interest for insurance purposes.
To evaluate your application and ability to pay for your policy by instalments. More information on how we use your information to do this is available under Detail Section 1 below.	Your contact details and bank account details.	Legal ground: such use is necessary in order to provide your insurance policy.

To prevent, detect and investigate fraud. More information on how we use your information to do this is available under Detail Sections 2 and 7 below. Technology may include voice analytics.	Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Credit information in order to prevent fraud check your identity, assess your creditworthiness, risk selection, pricing and underwriting. Information about your possessions such as your vehicle, your driving history, any information about your property, past claims, recent damage; information about your business premises (or vehicle). Information from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level where you are a telematics insurance policy holder. Information about the nature of your business and commercial assets, including any business you are associated with or a director of. Financial details. Information available in the public domain or on social media.	Legal grounds: such use is necessary in order to provide your insurance policy and we have a legitimate business need to prevent fraud. Legal ground for sensitive personal information: we need to use your personal information for reasons of substantial public interest to prevent and detect fraud.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
	Sensitive personal information about your physical or mental health or condition, including previous claims, or any penalties you may have for driving offences.	
For the purposes of debt recovery (e.g. where you have not paid for your insurance policy).	Information about you, your name, address, email address and contact details. Financial details including bank account details and credit reference checks.	Legal ground: we have a legitimate business need to recover any debt.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
For our own management information purposes including; managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice). More information on how we use your information to do this is available under Detail Section 3 below.	Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Information about your possessions such as your vehicle, your driving history, any information about your property, past claims, recent damage; information about your business premises (or vehicle). Information from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level where you are a telematics insurance policy holder. Information about the nature of your business and commercial assets. Financial details. Sensitive personal information about your physical or mental health or condition or any penalties you may have for driving offences.	Legal grounds: we have a legitimate business need to use your personal information to understand our business and monitor performance and maintain appropriate records. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes.

For the development and improvement of our products and services, including to develop and maintain appropriate pricing models for current and future customers.	Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees).Information about your possessions such as your vehicle, your driving history, any information about your property, past claims, recent damage; information about your business premises (or vehicle). Information from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level where you are a telematics insurance policy holder. Information about the nature of your business and commercial assets. Financial details. Where applicable, if you are an existing customer of our corporate partners (such as Lloyds Banking Group plc), a relationship score or similar provided by that corporate partner to us, which is taken from information about products you hold with them. Sensitive personal information about your physical or mental health or condition or any penalties you may have for driving offences.	Legal grounds: we have a legitimate business need to use your personal information to develop and improve our products and services, including the development and maintenance of appropriate pricing models. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
For customer feedback/surveys, research and analytical purposes and to improve our products and services, data quality and operational processes. More information on how we use your information to do this is available under Detail Sections 4 and 7 below. Technology may include voice analytics.	Your contact details, your age and the age of other person(s) included on the policy (family members, business partners, employees). Information about your possessions such as your vehicle, your driving history, any information about your property, past claims, recent damage; information about your business premises (or vehicle). Information from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level where you are a telematics insurance policy holder. Information about the nature of your business and commercial assets. Financial details. Sensitive personal information about your physical or mental health or condition or any penalties you may have for driving offences and injuries sustained in accidents.	Legal ground: we have a legitimate business need to use your personal information for services improvement. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes, or in certain circumstances, the processing is necessary for scientific or historical research purposes or statistical purposes.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
Complying with our legal or regulatory obligations.	Details about you, other related parties, your product or service, depending on the nature of the obligation.	Legal ground: such use is necessary for us to comply with our legal or regulatory obligations.
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers). Technology may include voice analytics.	Details about you and other related parties, your product or service having been discussed with you or your representative during a telephone conversation with us.	Several legal grounds may apply: such as where we need to comply with our legal or regulatory obligations; where necessary in order to perform our agreement with you. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes.
Providing information to you about our products and services as a personal customer or potential personal customer in accordance with preferences you have expressed. More information on how we use your information to do this is available under Detail Section 7 below.	Your name, contact details, marketing preference.	Legal ground: you have provided your consent.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
Providing information to you about our products and services as a business customer or potential business customer (including information about other products). More information on how we use your information to do this is available under Detail Section 7 below.	Your name, your business contact details.	Legal ground: legitimate business interests in the commercial sector.
To maintain, improve and protect our services and computer systems and ensure our network and information security and business continuity. For example, we may use your information to help us develop and test our systems, including new technologies and services. This is to make sure they're safe and secure and will work the way we want them to.	It may be necessary to use any of the personal information that is described in the other purposes set out in this table. When we do this, we'll use processes and technologies that are designed to keep your data secure.	Legal grounds: necessary for our legitimate interests in improving how we offer our services and the security of the computer systems we use. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes.

For AXA Health

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
To review insurance applications and provide quotes.	Your contact and identifying details. Employment details. Your location. If you consider taking our travel insurance; information about your travel plans, destinations, planned activities, dates of travel. Your age and information about your lifestyle (e.g. whether you smoke). Sensitive personal information about your physical or mental health or condition.	Legal ground: such use is necessary in order to take steps to provide your insurance benefits. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes or you or someone on your behalf have confirmed your consent. Please note that, in some cases, if you do not provide your consent, we may not be able to provide your insurance benefits.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
To administer, provide and service your insurance or healthcare trust benefits, assess eligibility for and handling and paying claims. More information on how we use your information to do this is available under Detail Section 5 below.	Your contact details and identifying details. Information about your location and your healthcare provider(s). Other information relevant to your benefits such as, for travel insurance your travel plans, including details of travel and activities undertaken. Your financial details such as bank account details. Sensitive personal information about your physical or mental health or condition or sexual life or sexual orientation.	Legal grounds: such use is necessary in order to perform our agreement with you or to which you are a party. We also have a legitimate business need to use your personal information to administer your benefits and handle any claims. Legal grounds for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes or you or someone on your behalf have confirmed your consent. Please note that, in some cases if you do not provide your consent, we may not be able to administer your benefits or pay a claim. In some cases our processing may be in your vital interests, for example if you had an accident abroad and need lifesaving medical treatment.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
To communicate with you and resolve any complaints you may have	Your contact details and identifying details. Financial details and any information relevant to your policy e.g. for travel insurance the duration of your travel and activities undertaken. Sensitive personal information about your physical or mental health or condition.	Legal grounds: such use is necessary in order to perform our agreement and we have a legitimate business need to resolve any complaints. Legal grounds for sensitive personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights, you have provided your consent, or the processing is necessary in the substantial public interest for insurance purposes.
If you are a sole trader or in a non-limited liability partnership and you are taking a business related product. To evaluate your application and your ability to pay your policy by instalments. More information on how we use your information to do this is available under Detail Section 1 below.	Your contact details and identifying details as well as your bank account details.	Legal ground: such use is necessary to take steps in order to provide your insurance policy.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
To prevent, detect and investigate fraud. More information on how we use your information to do this is available under Detail Section 6 below. Technology may include voice analytics.	Your contact and identifying details. Employment details. Financial details. Information relevant to your policy such as: Information about your travel plans, destination, planned activities, dates of travel; or Sensitive personal information about your physical or mental health, a condition, sexual life or orientation (in so far as they may relate to services).	Legal grounds: such use is necessary in order to perform our agreement and we have a legitimate business need to prevent fraud. Legal ground for sensitive personal information: we need to use your personal information for reasons of substantial public interest to prevent and detect fraud.
To review or assist others such as the Care Quality Commission assess the performance of healthcare providers to identify concerns regarding the care being provided to our customers and the public.	Contact and identifying information. Sensitive personal information about your physical or mental health or condition.	Legal ground: it is in the public interest to identify, or help others identify, deficiencies in the standards of care being provided. Legal grounds for sensitive personal information: such use is necessary for reasons of public interest in the area of public health.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
To safeguard you (and hence others) against harm from potentially unnecessary or inappropriate treatment by a healthcare provider.	Contact and identifying information. Information relating to your claim including; Sensitive personal information about your physical or mental health or condition.	Legal ground: Public interest because possible inappropriate behaviour in your case warrants further review of other cases for wider issues. Legal grounds for sensitive personal information: necessary to safeguard you or necessary for identifying malpractice.
For the purposes of debt recovery (e.g. where you have not paid for your insurance policy).	Contact and identifying information. Financial details including bank account details and credit reference checks. Possibly, depending on the nature of the debt, sensitive personal information about your physical or mental health or condition.	Legal ground: we have a legitimate business need to recover any debt. Legal grounds for sensitive personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights.
For our own management information purposes including; managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice). More information on how we use your information to do this is available under Detail Section 3 below.	Contact and identifying details. Financial details. Sensitive personal information about your physical or mental health or condition. Employment details.	Legal ground: we have a legitimate business need to use your personal information to understand our business and monitor performance and maintain appropriate records. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes or you have provided your consent.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
For customer feedback/surveys, research and analytical purposes and to improve our products and services, data quality and operational processes. More information on how we use your information to do this is available under Detail Section 4 below. Technology may include voice analytics.	Contact and identifying details. Financial details. Sensitive personal information about your physical or mental health or condition. Employment details	Legal ground: we have a legitimate business need to use your personal information for services improvement. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes or you have provided your consent, or in certain circumstances, the processing is necessary for scientific or historical research purposes or statistical purposes.
Complying with our legal or regulatory obligations for example identification and reporting of money laundering; international sanction checks.	Contact and identifying information. Financial details. Information relevant to your claim. Sensitive personal information about your current or former physical or mental health or condition.	Legal ground: such use is necessary for us to comply with our legal or regulatory obligations.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers). Technology may include voice analytics.	Contact and identifying details. Information relevant to a claim. Financial details. Any information you might otherwise give us during your interactions with us.	Several legal grounds may apply: such as where we need to comply with our legal or regulatory obligations; where necessary in order to perform our agreement with you. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes or you have provided your consent.
Providing information to you about our products and services as a personal customer or potential personal customer.	Contact and identifying information. Lifestyle and information about social circumstances. Information about the goods and services you currently have with AXA. Marketing preferences.	Legal ground: depending on the circumstances this could be legitimate business interests or we have your consent.
Providing information to you, about our products and services as a business customer or potential business customer (including information about other products).	Your business contact information and publicly available information about your business.	Legal ground; legitimate business interests in the commercial sector, or we have your consent.

Why we need your personal information	Personal information we may process for the purpose adjacent may include, but shall not be limited, to the types of information set out below	Legal Grounds for Processing
To maintain, improve and protect our services and computer systems and ensure our network and information security and business continuity. For example, we may use your information to help us develop and test our systems, including new technologies and services. This is to make sure they're safe and secure and will work the way we want them to.	It may be necessary to use any of the personal information that is described in the other purposes set out in this table. When we do this, we'll use processes and technologies that are designed to keep your data secure.	Legal grounds: necessary for our legitimate interests in improving how we offer our services and the security of the computer systems we use. Legal ground for sensitive personal information: the processing is necessary in the substantial public interest for insurance purposes or you have provided your consent.

Detail Section 1 – How do AXA Insurance and AXA Health evaluate your ability to pay for your policy by instalments?

AXA Insurance is required by regulation to undertake a reasonable assessment of the creditworthiness of a customer before offering the option to pay by instalments. Searches and other information which is provided to us and/or the Credit Reference Agencies about you and those with whom you are linked financially, may be used by us if you, or other members of your household, apply for other facilities including insurance applications/quotations (including those you obtain through price comparison websites). When you request a quote, a 'soft search 'will be carried out and will show under the name of the supplier we use to facilitate this search (for example, when AXA Insurance carry out a soft search, we use Lexis Nexis so the search will show under their name). If you then proceed to purchase a policy with AXA and wish to pay monthly, a 'hard search' will be carried out and will show under the name of the AXA entity conducting the search (for example, AXA Insurance). For more information on the Credit Reference Agencies, see Section 5 – Who Do We Share Your Information With?

Where you have a policy with us, we may undertake further assessments where a policy amendment takes place or in preparation for the renewal invitation or when a claim is submitted. This personal information may also be used for debt tracing and the prevention of money laundering as well as the management of your account.

Please note, AXA Health only undertakes this activity in respect of commercial clients, including sole traders.

<u>Detail Section 2 – How does AXA Insurance use your information to prevent, detect and investigate fraud?</u>

When you take out a car insurance policy, AXA Insurance will add your policy details to the Motor Insurance Database ("MID"), run by the Motor Insurers' Information Centre ("MIIC"). MID data may be used by the Driver and Vehicle Licensing Agency ("DVLA") and the Driver and Vehicle Licensing Northern Ireland for the purpose of electronic vehicle licensing and by the police for the purposes of establishing whether a driver's use of a vehicle is likely to be covered by a motor insurance policy and for preventing and detecting crime. If you are involved in an accident, whether in the UK or abroad, other UK insurers, the Motor Insurers' Bureau and MIIC may search the MID to obtain relevant policy information. For more information on the Credit Reference Agencies, see Section 5 – Who Do We Share Your Information With?

AXA Insurance is required by regulation to undertake a reasonable assessment of the creditworthiness of a customer before offering the option to pay by instalments. Searches and other information which is provided to us and/or the Credit Reference Agencies about you and those with whom you are linked financially, may be used by us if you, or other members of your household, apply for other facilities including insurance applications/quotations (including those you obtain through price comparison websites). For more information on the Credit Reference Agencies, see Section 5 – Who Do We Share Your Information With?

Persons pursuing a claim in respect of a road traffic accident (including citizens of other EU countries) may be entitled to access relevant information held about you on the MID. You can find out more about this from us, or from the <u>Motor Insurance Bureau</u>.

To help keep premiums low we do participate in a number of industry initiatives to prevent and detect fraud. To help prevent and detect fraud and other related crimes and to validate information provided to AXA we may at any time:

- approach the DVLA to check all or any relevant driving licence details of anyone named on the policy;
- share information about you with other organisations and public bodies including the police;
- share information about you and any other named persons on the policy within the AXA Group and with other insurers;
- where fraud is suspected, obtain information from Credit Reference Agencies to assist us with our fraud prevention investigations;
- pass the details you have supplied to recognised centralised insurance industry applications, policy and claims checking systems (for example, the Motor Insurance Anti-Fraud and Theft Register, Claims and Underwriting Exchange (CUE), No Claims

Discount (NCD) database and all DVLA databases) where those details will be checked and updated;

- load your details and any information or documents you provide us to the Insurance Fraud Register (please note that this may affect future applications for insurance products: for further information please visit https://www.theifr.org.uk/en/) and verify with fraud prevention agencies and databases including publicly available data (for example on County Court Judgements, bankruptcy information and electoral roll data) any details you have provided us with.

If false or inaccurate information is provided and if fraud is suspected, details will be passed to fraud prevention agencies to prevent fraud and money laundering and we will periodically search records held by fraud prevention and Credit Reference Agencies to:

- help make decisions about credit services for you and your financial associates;
- help make decisions on insurance policies and claims for you and your financial associates;
- trace people who owe money, recover debt, prevent fraud and to manage your insurance policies;
- check your identity to prevent money laundering;
- carry out credit searches, electoral roll searches and further fraud searches.

For more information about the agencies with which we share your data, including further details explaining how the information held by fraud prevention agencies may be used, or to obtain details about how Credit Reference Agencies collect and process information (including how to access the Credit Reference Agency Information Notice or "CRAIN"), please email us at fraud@axa.co.uk.

Detail Section 3 – How do AXA Insurance and AXA Health use your information for Management Information purposes?

We use your personal information to help us understand our business and monitor our performance, for example, to help determine how much insurance premiums should be. We also look to see where there might be trends in geographical or postcode areas to ensure we are prepared in the event of adverse weather conditions, or to identify where there is a higher or lower tendency to claim than average, or higher or lower healthcare charges and claims costs to ensure we offer the appropriate price or even a different type of service.

If you are a member of a group health insurance or healthcare trust scheme, we may use your personal information to create reports for your employer, their insurance broker or employee benefits consultants, or a parent company on the performance of the scheme and on the health of the workforce. The information we provide usually would not allow your employer to identify any individual employee. We may provide a piece of information that compares total claims paid out on the scheme with the premium paid. This helps companies get the best value quotes from other insurers at renewal. For small groups this may cause an employer to infer that a claims cost was due to a particular person.

AXA may also use services which collate views about AXA shared within social media platforms to obtain a better understanding of opinions about our products and services shared publicly.

Detail Section 4 – How do AXA Insurance and AXA Health use your information for customer feedback/surveys, research and analytical purposes and to improve our products and services, data quality and operational processes?

We may use your personal information for research and analysis including general research into health-related areas and research about the products and services we provide. Where possible, we will take steps to anonymise (see above), pseudonymise or put appropriate controls and governance in place to protect personal sensitive information.

By analysing customer information and feedback/surveys we can tailor and improve our products and services to better suit the needs of our customers. We bring together information about the products you hold across the AXA UK Group of companies to help us improve our product offerings as well as our internal operational processes, which can in turn drive customer service improvements. The majority of work we do is the same as we have done in the past, but we can now work with new and better technology for efficiency and speed.

On occasion we may work with research institutions and specialist providers in order to accelerate our research and development of products and services and contribute to developing areas of public interest. When we do this, we consider each use on a case by case basis and ensure we have undertaken a full data protection risk assessment.

Detail Section 5 – How does AXA Health use your information to administer your insurance or Trust benefits and assess your eligibility for and the handling and paying of claims?

We use your personal information for the ongoing management of any claims you have and paying your medical bills. We will sometimes need to clarify information with your healthcare provider or hospital, such as what treatment you have received if a bill is unclear.

Sometimes it will be necessary for our clinical teams to discuss your treatment with your healthcare provider, without first getting your consent. Typically, this will happen if you have been unexpectedly admitted to hospital and we are unable to contact you, or you are not able to give your consent. In such cases we will always act in your interests to establish whether your treatment is eligible for cover. Very occasionally we may need to do this when we are not satisfied that your healthcare provider is acting in your best interests and may do you unnecessary harm, for example, by expressing an intention to undertake a medical procedure that appears to be unnecessary.

Detail Section 6 – How does AXA Health use your personal information to prevent, detect and investigate fraud?

To help keep costs and premium levels down we have processes in place to identify and investigate possible fraud both by customers and by healthcare providers. In some investigations we may interact and share information with hospital fraud departments, healthcare providers, law enforcement agencies and other insurance companies. We participate in the activities of the Health Insurance Counter Fraud Group and the Insurance Fraud Bureau. We may use information provided by these organisations as well as publicly available information on social media and other sources (including third parties who assist with identity verification and work with Credit Reference Agencies) to help us combat fraud. We may report suspicions of medical malpractice to the relevant regulatory body such as the General Medical Council, or a supervising clinician/Responsible Officer.

We also monitor the services you are being provided by healthcare providers for these purposes and to ensure accurate billing. In some cases, we are required by law to report crime and suspected crime and other matters to law enforcement and government agencies.

For more information about the Credit Reference Agencies with which we share your data and how they collect and process information (including how to access the Credit Reference Agency Information Notice or "CRAIN"), please email us at fraud@axa.co.uk.

Detail Section 7 – What is Artificial Intelligence (AI) and how does it work?

Artificial Intelligence is an umbrella term for a range of technologies that replace manual processes and solve complex tasks by carrying out functions that previously required human action. Tasks that we have traditionally done by thinking and reasoning are increasingly being done by, or with the help of, AI.

We use AI to support our existing activities. This means that how we collect your personal information and the types of personal information we use do not change. To use AI, we combine information you have provided to us directly, information we derive about you from your use of our services or your interactions with us, and information from other people and organisations. We use AI for different purposes which we explain in more detail below.

To communicate with you:

We provide virtual assistants and chat bots so you have a choice of methods to communicate with us, especially out of office hours. The virtual assistants and chat bots may use elements of AI, for example by understanding your questions and guiding you to or presenting you with appropriate help content and information or transferring you to an adviser.

Pricing and underwriting:

We use the information you give us when you request a quote and / or purchase a policy, information from our suppliers and data providers (such as information about your credit history, claims history, vehicle and / or property, more general information about demographics, flood risk and local crime rates / activity in your area) and information we receive from your vehicle's on-board diagnostics device or telematics App, such as your location and location history, speed, distance driven, mileage reading, your cars vehicle identity number (VIN), any engine faults and warning lights, cornering and braking and fuel and battery level (where you are a telematics insurance policy holder) to determine the risk involved with offering an insurance policy and the appropriate price to charge. We use AI to help with these processes – for instance, AI helps us to estimate how much a claim could be, the likelihood of a claim being made, and it also forms part of our fraud detection and prevention procedures.

Claims handling:

We use AI to expedite and improve our claim handling service. This entails using information you give to us when you submit a claim, information we already hold about you, such as information we've received from your vehicle's on-board diagnostics device or telematics App, and information from our partners, brokers, suppliers and data providers (such as cost of parts / materials, vehicle values, house values, weather conditions on the date of your claim, transport links and suppliers providing the required service in your area).

For example, AI helps us to determine the most appropriate route for your claim (i.e. to repair or write-off your vehicle), and the best supplier to assist you with your claim (i.e. the most suitable garage to repair your vehicle, or builder to repair your home). It can also help us to estimate the total cost of a claim and determine the most appropriate way to settle your claim.

We also use AI for wider processes that support claims management, such as indexing the documents that support your claim to your customer record, early identification of complaints, and as part of our fraud detection procedures.

Customer value, retention and satisfaction:

We use AI to understand and segment our customer base so that we can continually improve our products, service and communications. For instance, AI help us to predict whether customers will renew their insurance policies with us, to offer them renewal journeys most suited to their preferences (online or by phone), and to personalise renewal invites. We also use AI to identify vulnerable customers so that we can better support their needs.

The information that we use to do this is collected directly from customers during the course of their relationship with us, derived from our customers' interactions (such as duration of customer relationship, whether customers interact online or on the phone, and number of AXA products), and received from data providers (such as information about our customers' local area and postcode information).

We use AI to analyse information from customer surveys, feedback forms, calls and complaints to understand how satisfied our customers are with our products, service and communications. For instance, we use AI to classify whether a comment or review is positive or negative and what the comment or review is focussed on (e.g. customer service, price, claims etc). This helps us to optimise customer journeys and improve products and services.

Marketing:

We use AI to understand and segment our customer base so we can continually improve our products, service and communications. For instance, AI helps us to recommend the right product or content to the right customer, understand how different channels are performing and which customers are using them, and identify next best actions, such as sending a motor customer a marketing email for house insurance because their renewal date is coming up and we could offer a competitive price (where you have opted in to receive marketing).

The information that we use to do this is collected directly from customers during the course of their relationship with us, received from data providers (such as information about your local area and postcode information) and derived from our customers' information (such as duration of customer relationship, whether customers interact online or on the phone, and number of AXA products).

5. Who do we share your personal information with?

We might share your personal information with two types of organisation – companies inside the AXA Group, and other third parties outside the Group. For further details of disclosures, please see below. We won't share any of your personal information other than for the purposes described in this Privacy Policy.

For AXA Insurance UK Plc

Who might we disclose your personal information to?

Disclosures within our group

In order to provide our services your personal information is shared with other companies in the AXA Group including, but not limited to AXA Global Business Services in India. Your personal information might be shared for our general business administration, efficiency and accuracy purposes or for the prevention and detection of fraud, and also when we make changes to our Group company structure.

Disclosures to third parties outside our group

We also disclose your information to the types of third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your relatives or, guardians or someone else acting on your behalf where you are incapacitated or unable, or other people or organisations associated with you such as your insurance broker or your lawyer
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf
- Our insurance partners such as brokers, other insurers, reinsurers or other companies who act as insurance distributors, and corporate partners (including Lloyds Banking Group plc), where appropriate
- Other third parties who assist in the administration of insurance policies such as another Insurance Company if there has been an accident which requires a claim to or from that Insurance Company
- Our third-party premium credit providers when you choose to finance specific products in instalments
- Other suppliers, providers of goods and services associated with this insurance and/or to assist us or enable us to deal with any claims you make including contractors and their subcontractors

- We may share the personal information of any persons named on the policy with third parties to obtain information which may be used by AXA to inform its risk selection, pricing and underwriting decisions
- Corporate partners (including Lloyds Banking Group plc), where appropriate. for reporting purposes and product performance analysis to help identify ways to improve their product and customer experience
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers and/or assist with identification checks
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- Motor Insurers' Information Centre and the DVLA
- We work in partnership with the Motor Insurers' Bureau (MIB) and associated not-for-profit companies who provide several services on behalf of the insurance industry. At every stage of your insurance journey, the MIB will be processing your personal information and more details about this can be found via their website: mib.org.uk. Set out below are brief details of the sorts of activity the MIB undertake:
    - Checking your driving licence number against the DVLA driver database to obtain driving licence data (including driving conviction data) to help calculate your insurance quote and prevent fraud
    - Checking your 'No Claims Bonus' entitlement and claims history
    - Prevent, detect and investigate fraud and other crime, including, by carrying out fraud checks
    - Maintaining databases of:
        - Insured vehicles (Motor Insurance Policy Database or Motor Insurance Database/MID)
        - Vehicles which are stolen or not legally permitted on the road (Vehicle Salvage & Theft Data or MIAFTR)
        - Motor, personal injury and home claims (CUE)
        - Employers' Liability Insurance Policies (Employers' Liability Database)
    - Managing insurance claims relating to untraced and uninsured drivers in the UK and abroad
    - Working with law enforcement to prevent uninsured vehicles being used on the roads
    - Supporting insurance claims processes.
- Passing information to a third party for the purpose of validating your No Claims Discount (NCD) entitlement and this may be made available to other insurers
- Also to other companies or insurers for the purpose of validating your NCD entitlement
- Your Road Relay Agent, such as the AA or Greenflag
- An AXA recommended garage or panel beater or your designated garage or panel beater
- If you are a third party involved in a motoring incident where our policyholder is at fault we may pass your details to a third party in order to offer services (e.g. repairs and/or hire)

- Our third party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, research specialists, document management providers and tax advisers
- Categorised postcodes may be shared for brand tracking purposes
- Financial organisations and advisers
- Central Government
- The Financial Ombudsman Service and regulatory authorities such as the Financial Conduct Authority and the Information Commissioner's Office
- Overseas assistance companies
- Loss Adjusters
- Car Hire Companies
- If you are a third party making a credit hire claim, we may disclose your vehicle registration details in order to obtain ANPR (Automatic Number Plate Recognition) data for the purpose of verifying your claim
- House Builders or other House Repairers
- Emergency Assistance Companies
- Your healthcare practitioner
- Debt collection agencies
- Credit Reference Agencies (CRAs) for the purposes of fraud prevention, identity checking, assessing creditworthiness, risk selection, pricing and underwriting. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at:
    - TransUnion: **www.transunion.co.uk/crain**
    - Equifax: **www.equifax.co.uk/crain**
    - Experian: **www.experian.co.uk/legal/crain**

  When we carry out these searches, this may leave a footprint on your credit record under the name of the supplier used to facilitate the search (for soft searches) or the AXA entity carrying out the search (for hard searches).
- The Employers Liability Tracing Office
- Other insurers to obtain a claim contribution where there is another insurance covering the same loss, damage, expense or liability
- Selected third parties in connection with the sale, transfer or disposal of our business or any part of our business.

Disclosure of your personal information to a third party outside of the AXA Group with the exception of law enforcement agencies or other bodies exercising their official authority will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- we are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Prudential Regulatory Authority / Financial Conduct Authority or Information Commissioners Office request; or
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest; or
- exemptions under the data protection legislation allow us to do so

Some of the recipients and technical solutions set out above may be in countries outside the United Kingdom notably in (i) Switzerland, where AXA has a European Data Centre, and (ii) India, where some administration is undertaken. Where we make a transfer of your personal information outside the United Kingdom, in all cases where personal data is transferred to a country which is deemed not to have the same standards of protection for personal data as the UK AXA will ensure appropriate safeguards such as UK regulator approved Standard Contractual Clauses and further contractual, organisational and technical measures (as may be required following an assessment of the risk) have been implemented to ensure that your personal information is protected. Occasionally there may also be some circumstances where we are required to transfer your personal information outside the United Kingdom and we shall rely on the basis of processing it for being necessary for the performance of your contract.

For AXA Health

Who might we disclose your personal information to?

Disclosures within our group

In order to provide our services your personal information is shared with other companies in the AXA Group including, but not limited to AXA Global Business Services in India . Also, your AXA insurance broker if you have one. Your personal information might be shared for our general business administration, efficiency and accuracy purposes, and also when we make changes to our Group company structure.

Disclosures to third parties outside our group

We also disclose your information to the types of third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your relatives, guardians or someone else acting on your behalf where you are incapacitated or unable, or other people or organisations connected to you such as your insurance broker, or your lawyer
- A relative or guardian (or their insurance broker) who has purchased an insurance policy (the 'Lead Member') and included you as a dependent on it – we will inform them that you have made a claim if this impacts their No Claims Discount. We may also share the cost of the claim if that cost is less than the cost of the change in no claims discount it caused. Depending on the type of insurance cover you have, this may amount to sharing your health information. Similarly, if you notify us of a medical condition that you had at the time of purchase which the Lead Member didn't tell us about, we may share this with them if it affects the terms of their policy
- Your current, past or prospective employers if you have been part of a group scheme or their agents
- Your healthcare social and welfare advisers, or practitioners and similar practitioners appointed by us to review claims, or to triage claims to help determine a suitable healthcare journey and/or service.
- Other insurers if you are transferring from one insurer to another, or our reinsurers
- Our third-party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, research specialists, document management providers and contractors and their sub-contractors
- Suppliers and providers of goods or services that we make available to you such as the provider of the online GP service (AXA Doctor at Hand), the muscles, bones and joints service and mental wellbeing coaching service
- Categorised postcodes may be shared for brand tracking purposes
- Financial organisations and advisers
- Central and local Government (for example if they are investigating fraud or because we need to contact them regarding international sanctions)

- The Financial Ombudsman Service and regulatory authorities such as the Financial Conduct Authority, the Care Quality Commission and the Information Commissioner's Office
- Other insurance companies, NHS fraud teams, the General Medical Council, the police, National Crime Agency, other law enforcement agencies and organisations that maintain anti-fraud or other crime databases and third parties (including Credit Reference Agencies) to assist with identity checks in order to combat fraud, where reasonably necessary for the prevention or detection of crime
- Selected third parties in connection with the sale, transfer or disposal of our business or any part of our business.

Disclosure of your personal information to a third party outside of the AXA Group with the exception of law enforcement agencies or other bodies exercising their official authority will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- we are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Prudential Regulatory Authority / Financial Conduct Authority or Information Commissioners Office request;
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest; or
- where exemptions under the data protection legislation allow us to do so.

Some of the recipients and technical solutions set out above may be in countries outside the United Kingdom notably in i) Switzerland, where AXA has a European Data Centre, and ii) India, where some administration is undertaken. Where we make a transfer of your personal information outside the United Kingdom in all cases where personal data is transferred to a country which is deemed not to have the same standards of protection for personal data as the UK AXA will ensure appropriate safeguards such as UK regulator approved Standard Contractual Clauses and further contractual, organisational and technical measures (as may be required following an assessment of the risk) have been implemented to ensure that your personal information is protected. Occasionally there may also be some circumstances where we are required to transfer your personal information outside the United Kingdom and we shall rely on the basis of processing it for being necessary for the performance of your contract; for example, where you have a travel insurance policy and we need to contact you when you are on holiday.

6. How long do we keep records for?

In most cases, we will keep your information for between three and ten years after our relationship with you ends but it will vary depending on what data we hold, why we hold it and what we're obliged to do by the regulator or the law.

We keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply or demonstrate compliance with our legal and regulatory obligations. Where we can, and it is appropriate, we will minimise personal data or de-personalise data to use for statistical or analytical purposes.

The time period we retain your personal information for will differ depending on the nature of the personal information and what we do with it. We typically keep quote information for three years, and policy and claims records for up to ten years from the end of our relationship with you. For healthcare Trust records this is typically thirteen years. In some cases, such as if there is a dispute or a legal action affecting the information we may need or be required to keep personal information for longer. Beyond ten years (or thirteen years) we will keep minimised information for statistical analysis for example for pricing and risk modelling purposes to understand notable events, such as weather and subsidence and health conditions and their treatment costs. Long term insurance products such as liability insurance are kept for an extended period.

7. Your Rights

You can ask us to do various things with your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even delete it. We'll either do what you've asked, or explain why we are unable to - usually because of a legal or regulatory issue.

You can make any of the requests set out below using the contact details provided to you in your documentation. You can also find details of the appropriate Data Protection Officer in the section of this notice, "How do I contact the Data Protection Officer?"

For further details about your rights please see below.

You have the following rights in relation to our use of your personal information.

The right to access your personal information:

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you electronically where possible. Where not possible, or where otherwise agreed, we will provide your personal information in writing, (or audio recording for telephone calls).

The right to rectification:

We take reasonable steps to ensure that the personal information we hold about you is accurate and, to the extent necessary, complete. However, if you do not believe this is the case, please contact us by using the details shown in your documentation and you can ask us to update or amend it.

The right to erasure:

In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the purpose for which we have told you we will use it, or where you withdraw your consent if that is our legal ground for processing the information. However, this will need to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it. There may be some legal and regulatory reason which means we cannot comply with your request.

Right to restriction of processing:

In certain circumstances, you are entitled to ask us to suspend using your personal information for a period, for example where you think that the personal information we hold about you may be inaccurate, to allow us to verify the accuracy, or where you think that we no longer need to process your personal information, but you need us to keep it for legal reasons.

Right to data portability:

In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.

Right to object:

You can ask us to stop sending you marketing messages at any time. Please see the Marketing section for more information.

You can ask us to stop processing all or some of your personal information when we're doing this for other (non-marketing) purposes. Although, depending on the purpose and our legal basis for processing, we may not always be able to fulfil your request.

Rights relating to automated-decision making:

Some of our decisions are made automatically by computer systems/technology (rather than by our employees) and are based on your personal information. We recognise that sometimes these decisions can have a legal or similarly significant effect on you and when they do, you can ask us to provide an explanation and ask for a member of staff to review the decision:

- **Deciding your premium – AXA Insurance**
  We use the personal information that you and others provide to us about you, your family, property, where you live, your policy, claims history, and other non-personal information such as garage repair costs to determine your premium and eligibility.

  We also use information about how long you have been a customer, how many claims you have made and how much you pay in premiums to determine what terms you are offered at renewal.

  Where applicable, if you are an existing customer of our corporate partners (such as Lloyds Banking Group plc), we will also use a relationship score (or similar) provided to us by that corporate partner to more accurately price your insurance.

- **Fraud prevention – AXA Insurance**
  AXA Insurance uses automated anti-fraud filters that check against lists of people known to have undertaken fraudulent transactions and will reject those applicants on the basis they are likely to defraud the company.

- **Assessing your application – AXA Insurance**
  We may use scoring methods to assess your application, to verify your identity and determine finance charges.

We use individual credit reference information about you provided to us by third parties in order to assess your suitability for insurance and the price we offer to you. The information used to assess your insurance risk includes: verification of your residence at address via bills and electoral roll, historic payment behaviour on financial products, prior insolvency and any prior county court judgments. If we are unable to validate your residence at the insured address or consider your historic payment behaviour with creditors to be significantly adverse, we will decline to offer you a price for your insurance risk. The credit reference assessments carried out by AXA Insurance are bespoke and will not impact your ability to obtain insurance or other financial products elsewhere.

- **Assessing your claims**

  AXA Insurance:
  We may use automated processing to assess who is at fault for a claim and / or whether your claim is eligible for payment. For example, if you've used our self-serve facility to advise us that you've hit a stationary car or hit a car going in a straight line when changing lane, our system will make an initial automated decision that you are fault as there is no other person or company that can held responsible for the incident meaning we wouldn't be able to reclaim the costs. Vice versa, if you've advised us you were hit in the rear while stationary, our system will make an initial automated decision that the other party is at fault meaning we will make every effort to reclaim the costs from the party at fault. Where the fault is not clear, your claim will be referred to a Claims Handler for further review.

  AXA Health:
  We may use automated processing to assess whether your claim is eligible for payment or whether an invoice from a healthcare provider is eligible for payment. Eligibility for payment of a healthcare provider invoice is based on whether your membership is active at the time you claim and/or incur a cost for which there is a claim and if so whether or not the claim or cost is covered under the terms of your policy/scheme membership.

The right to withdraw consent

For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. Please note in some cases we may not be able to process your application or claim if you withdraw your consent.

The right to lodge a complaint

You have a right to complain to the Information Commissioner's Office (ICO) at any time if you believe that we have not met the requirements of data protection law. The ICO will usually expect that you have given us the opportunity to resolve your complaint before they will take up your enquiry, so please do tell us first if you think we have not complied with these laws. More information can be found on the Information Commissioner's Office website: https://ico.org.uk/

In some circumstances exercising some of these rights will mean we are unable to continue providing you with cover or services. This may therefore result in the cancellation of a policy or service. You may also lose the ability to bring any claim or receive any benefit or service including in relation to any event that occurred before you exercised your right. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

8. Marketing

You're in control of whether we may use your information for marketing. If you are an existing customer, we will only contact you if you've agreed it's okay. Then, we might use your information to tell you about products and services that could interest you.

If you are a customer we may share information between the AXA UK Group* to inform you of other products and services that may be of interest to you or members of your family, but we will only do this where you have provided your consent. You can always change your mind by contacting us using the details shown in your documentation and telling us you no longer wish to be contacted.

If you have expressed marketing preferences regarding marketing by the whole AXA UK Group we will share your contact details and those marketing preferences to ensure that the AXA UK Group of companies have the most up to date information, especially if you have objected to being contacted.

If you are not a customer we may still ask for permission for marketing by the UK Group, where required. We will respect your right to opt out of marketing if you choose to do so.

We would like to keep you informed, from time to time about relevant products and services. We may do this by mail, email, telephone or other electronic methods such as text message. In order to help us get to know you and identify what products and services may interest you we obtain information about you from other sources inside and outside the AXA Group for example, companies who provide consumer classification, market segmentation and lifestyle data for marketing purposes. Examples of these organisations are Experian or LexisNexis.

We may use pixels within our marketing emails to enable us to see whether the email was delivered and accessed to provide us with insights into the performance of our campaigns so we can provide you with more relevant content at optimum times.

If you wish to unsubscribe from marketing emails sent by us, you may do so at any time by following the unsubscribe instructions that appear. Otherwise you can always contact us using the details set out in your documentation to update your contact preferences. In such circumstances, we will continue to send you service related (non-marketing) communications where necessary.

In order to show you ads which we think may be relevant to your needs or interests, we'll sometimes use your personal information to run audience-specific social media and digital advertising campaigns. We'll also target individuals that have similar attributes to our customers with the support of specialist marketing companies. If you don't want to see our ads you can click on the ad and choose to opt out directly from them, alternatively you can also update your preferences within your social media and browser cookie settings.

Very occasionally we may also share your details with our selected business partners, for example national newspaper groups if we are running a joint campaign with them, but we will specifically tell you about this and who they are when we obtain your marketing preferences.

Business to business marketing, that is commercial marketing may rely on legitimate business purposes when contacting the organisation rather than marketing choices made by an individual.

If you sign up to receive the Business Guardian Angel (BGA) newsletter to receive business guides and advice alongside any relevant offers and promotions, this consent applies solely to the BGA newsletter and not any other AXA marketing consents. You can unsubscribe from the BGA newsletter at any time.

Please note that we may retain any data provided to us on our websites for a limited period, even if you do not complete your quote. The information may be used to enquire as to why you did not complete your quote or for us to better understand your needs but only if you have agreed for us to contact you.

* List of AXA UK Group companies and trading names who may market to you. We may update this list from time to time to reflect changes to our company structure:

- AXA UK plc
- AXA Insurance UK plc
- Swiftcover
- Moja
- AXA Health Limited (trading as AXA Health)
- AXA PPP healthcare Limited (trading as AXA Health)
- Health-on-Line Company (UK) Limited (trading as Health-on-Line and AXA Health)
- The Permanent Health Company Limited
- AXA Services Limited

9. Download a copy of the Privacy Policy

To download a full copy of this Privacy Policy in PDF format, please visit:

axa.co.uk/privacy-policy/

Version: March 2025

10. Contact Details of the Data Protection Officer

If you wish to contact one of the Data Protection Officers, whose companies are covered by this policy the details are below:

For AXA Insurance UK Plc, for Household, Motor and Business Insurance Products.

The Data Protection Officer:
AXA Insurance UK Plc
Brooke Lawrance House
80 Civic Drive
Ipswich
Suffolk IP1 2AN email address: dataprotection.ins@axa-insurance.co.uk

For AXA Health Ltd, AXA PPP healthcare Ltd. (insurance), AXA Health Services Ltd (Healthcare trust administration) and Health-on-Line Ltd

The Data Protection Officer
AXA Health
International House
Forest Road
Tunbridge Wells
TN2 5FE
email address: data.protection@axahealth.co.uk

For counselling/psychological and wellbeing services please refer to the separate Health Services Privacy Policy.

For The Permanent Health Company

The Data Protection Officer
The Permanent Health Company
Building 2
First Floor
Croxley Park
Hertfordshire
WD18 8YA
email address: support@thephc.co.uk (please mark: FAO The Data Protection Officer)

If you do not wish to deal direct with the above AXA companies then you can contact our head office:

The Data Protection Officer:
AXA UK Plc
20 Gracechurch Street
London EC3V 0BG email address: ukgroupprivacy@axa-uk.co.uk

If you would like to contact the UK's Information Commissioner's Office direct; please call their helpline on 0303 123 1113 or visit their website for more contact options:

https://ico.org.uk/make-a-complaint/

https://ico.org.uk/global/contact-us/

11. AXA UK Company Details

AXA UK Group

Wherever the name “AXA” is used on the Website, this implies one or more of the following companies within the AXA UK Group of companies, which may offer products or services on the Website. Further details can be found on the respective companies’ websites. We may update this list from time to time to reflect changes to our Group company structure.

AXA Insurance UK Plc

Trading as AXA Insurance a public company limited by shares incorporated in England and Wales with company number 078950 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG. Swiftcover, Swiftcover.com and Moja are trading names of AXA Insurance UK Plc

An insurance company that provides consumer and commercial insurance products such as motor, home, business and commercial insurance.

AXA UK Plc

Registered company number: 02937724 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG

The holding company of the other companies in the AXA UK Group, it principally processes personal data of employees.

In this document AXA Health means:

AXA Health Limited

AXA Health Limited is a private limited company incorporated in England and Wales with company number 12839134 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG.

An intermediary selling private medical insurance (PMI) and travel insurance as well as other AXA Health products. It also carries out insurance policy administration, including managing complaints relating to insurance products.

AXA PPP healthcare Limited

Trading as AXA Health, a private limited company incorporated in England and Wales with company number 03148119 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG.

An insurance company that sells and underwrites PMI and related benefits and travel insurance. It also reinsures PMI risk of several other insurance companies. It also provides a 24/7 information helpline for example for information about medications, pregnancy and debt

AXA Health Services Limited

Trading as AXA Health, a private limited company incorporated in England and Wales with company number 03429917 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG.

AXA Health Services Ltd provides:

i) Administration services to employer healthcare trust and other employer funded healthcare schemes

ii) third party claims administration for other Private medical insurance companies where it acts as a data processor and the client insurance company's privacy policy applies;

iii) Administration in support of fulfilment of any reward schemes run by companies trading as AXA Health, such as Refer a Friend schemes; and

iv) Clinical services such as physiotherapy assessment, Employee Assistance services such as counselling, critical incident support, health and wellbeing services. Some of these services are provided by AXA Health Services Ltd but delivered by a third party supplier, which is independently responsible for its data protection compliance. For privacy information regarding these services please see the separate privacy policy.

Health-on-Line company UK Limited

Trading as Health-on-Line and AXA Health, a private limited company incorporated in England and Wales with company number 03655704 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG.

An intermediary selling PMI and travel insurance to individuals and SMEs (small-medium enterprises). It has previously also used the trading names "SecureHealth" and "InsureMe-On-Line".

The Permanent Health Company Limited

Trading as PHC, a private limited company incorporated in England and Wales with company number 2933772 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG.

An intermediary selling PMI and travel insurance in the SME market through other intermediaries, it does not sell direct. It also handles claims authorisations for the insurer.

PPP Taking Care Limited (see separate privacy policy)

PPP Taking Care Limited trading as Taking Care, is a private limited company incorporated in England and Wales with company number 01488490 and whose registered office is at 20 Gracechurch Street, London EC3V 0BG.

Provides technology enabled care and support such as personal alarm and smoke detection systems with 24 hour monitoring to individuals both privately and through local authorities.

Healthcare Business Solutions (UK) Limited (please see separate privacy policy)

Trading as HBSUK, a private limited company incorporated in England and Wales with company number 07959430 and whose registered office is at Pure Offices, Lake View Drive, Annesley, Nottingham, England, NG15 0DT.

Provides online outpatient services to NHS and private healthcare clients (including AXA PPP healthcare Ltd and AXA Health Services Limited). It also provides insourcing services to the NHS to reduce waiting lists by deploying clinical teams.

AXA UK Group Pension Scheme Management Ltd (AXA UK GPSM Ltd)

AXA UK GPSM Ltd, is a private limited company incorporated in England and Wales with company number 14245763 and whose registered office is at 20 Gracechurch Street, London, EC3V 0BG.

AXA UK GPSM Ltd is AXA's in-house Occupational Pension Scheme firm which facilitates the investment activity of the AXA UK Group Pension Scheme. It processes personal data of employees from brokers and investment firms it works with. This data processing is part of financial transaction information collected and retained to comply with its legal and regulatory obligations. Personal data of these individuals will be collected as a result of their contact with AXA UK GPSM Ltd by email, telephone or electronic message and retained for 10 years. All calls are recorded by AXA's third-party telecommunications provider and personal data may be shared with third parties such as our professional or legal advisors, auditors and regulatory authorities.

12. AXA's data privacy declaration

Your personal information can help us give you a better, more personalised service. But looking after that data is a big responsibility. We take our responsibilities seriously, so we've introduced internationally recognised data privacy rules to protect you. We keep your data safe, confidential and will never sell it. And, if you ask us to, we'll tell you exactly what information we have so you can be sure it's up-to-date and accurate.

AXA's Data Privacy Declaration

AXA's mission is to help you, our customers, live your lives with more peace of mind by protecting your family, your property and your assets against risks. Doing so involves the collection of data so that we understand the nature of these risks that we cover for you, and that we may provide you with the right products and services to meet your needs.

Today's world is one in which the amount of available data is growing exponentially. Ultimately, this allows us to enhance your experience through tailor-made protection, more relevant information and simplified, efficient procedures.

We believe that protecting your personal information is essential when seizing these opportunities. This is why we considered it important to share with you the principles that will guide us with regard to the treatment of personal information.

12.1. Our Commitment to Safeguard Personal information

We know that respecting the confidentiality of personal information is critical to preserving your trust and therefore have developed security procedures and we use a range of organisational and technical security measures designed to protect your personal information from unauthorized use or disclosure.

We have a Data Privacy team at a global level and a network of Data Privacy Officers throughout our businesses to oversee data safety.

We are the first insurance group to have adopted Binding Corporate Rules (BCR). These rules represent an internationally recognized standard for protection of personal information and are an adequate safeguard for transferring your personal information to our group companies outside the European Economic Area. They were approved by the French Data Protection Authority (CNIL) and 15 other EU Data Protection Authorities including the UK's Information Commissioner's Office. BCRs are a data privacy contractual framework setting minimum measures for the protection of personal data (data of customers, employees, and other stakeholders) obtained in the course of business when such data is transferred in multinational companies.

Find out more at the Our commitments page, from where you can access:

AXA'S DATA PRIVACY DECLARATION

BINDING CORPORATE RULES (BCR)

LIST OF THE COMPANIES BOUND BY BCRS INCLUDING CONTACT DETAILS

FREQUENTLY ASKED QUESTIONS

12.2. Our Commitment in Respect to the Use of Personal information

We provide you with up-to-date prevention and protection solutions, through an in-depth and well-informed understanding of the risks you face. To do this, we collect your personal information and use it in compliance with data protection laws.

We have in place procedures and contractual arrangements designed to ensure that all employees, sales representatives, advisers and service providers keep client files confidential.

Our customers often entrust us with sensitive personal information in connection with insurance coverage we provide to them - both at the time of their initial subscription and during the term of their coverage. We view ourselves as custodians of this data and do not sell it to third parties outside the AXA Group. We may market products jointly with other companies in cases where we believe there is a unique or compelling value proposition for our customers.

12.3. Our Commitment to Dialogue and Transparency

As a leading international insurance group, we play a proactive role in public policy and regulatory debates around personal information protection.

These are our continuing commitments to you. We will keep pace with future developments surrounding data privacy to adapt them to your evolving needs.

For more information, please feel free to contact privacy@axa.com