



PRIVACY AND COOKIES NOTICE

1. BACKGROUND

We are committed to protecting and respecting your privacy in accordance with applicable data protection laws, including the **General Data Protection Regulation (GDPR)**, the **UK Data Protection Act 2018**, and the **Spanish LOPDGDD**. This notice explains how we collect, use, and protect your personal data. The **Data Controller** will be the ANV's entities to which you have provided your data. For a full list of our ANV's entities, please refer to our Companies page.

2. INFORMATION WE MAY COLLECT

Identification data, service-related data, financial data, sensitive data (health, union membership, criminal records), marketing preferences, and call recordings.

We collect and process personal data that you provide directly to us by filling in forms, via our website, over the phone or via mobile phone apps, or that we receive via third parties (for example – public records, insurance brokers, agents, claims investigators, claims handlers and business partners). This includes the following categories of data:

- **General identification and contact information:** Name; address; e-mail and telephone number; personal identification number or similar identity number; gender; marital status; relationship with the policyholder, insured or claimant; and membership (information that we receive from you or a third party).

- **Information enabling us to provide products and services:** Location and identification number or similar information to identify insured property (for example unique identity number such as the phone IMEI-number, address or vehicle registration number); information regarding loans or credits if the insurance concerns payment protection; information about travel arrangements to the extent the insurance concern travel insurance; age and categories of individuals you wish to insure; information about your current employment; membership; previous claims history; other insurances you subscribed for; and date and cause/background of/to a claim made (Information that we receive from you or a third party).

- **Financial information and account details:** Payment card number; bank account number and account details; credit history and credit score; assets; income; and other financial information (Information that we receive from you or a third party).

- **Sensitive information:** We may process the following sensitive information about you; (a) data concerning health such as current or former physical or mental or medical condition and medical history; (b) union membership (for example if you apply for an insurance that has been procured by or offered through a union); (c) criminal conviction information.

- **Information which is necessary to discover, prevent or investigate fraud or investigations towards financial sanctions lists:** We may process personal data to enable us to discover, prevent or investigate fraud or fulfil our duty to check all transactions against financial sanctions lists before issuing insurance or processing payments under the insurance

- **Telephone recordings:** Recordings of telephone calls to our representatives and call centres.
- **Marketing preferences:** You may let us know your marketing preferences, and take part in sales promotions.

Specific information concerning “Sensitive” Personal Data

Where required by us, for the specific purposes of underwriting and fraud detection, or as part of the claims handling process, we may ask you for sensitive information, such as information relating to health or criminal convictions. The provision of such data is conditional for us to be able to provide insurance or manage a claim and, whilst you may, in some cases, be able to withdraw your consent for us to process such data, this may result in us not being able to continue cover, or to process any claims. Processing of sensitive data may be done also after you have withdrawn your consent, but only to the extent that we have the right to process the data for establishment, exercising or defence of legal claims. Sensitive data will only be used for the specific purposes set out in this policy, and will be treated securely and in line with this policy.

3. HOW WE USE YOUR INFORMATION

All data that you supply or we receive from third parties are normally necessary for entering into a contract with us and for us to be able to carry out our obligations towards you under the insurance contract. We also need to process the data for other purposes described below:

Category of personal data	Purpose of processing	Legal basis for processing
General identification and contact information	Calculate insurance premium, offering and accepting insurance cover, offering renewal, informing of changes in the insurance, handling of claims and complaints	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; or ANV legitimate interests of improving its products, development of its systems and to offer you relevant insurance products.
	Validate/confirm your identity	Fulfil our contractual obligations towards you; or
		Comply with applicable laws.
	Marketing activities	Consent.
	Issuing newsletters	ANV legitimate interests of

		improving its products and services, and keeping you informed of industry changes
	Answer your questions through the web, e-mail, mail or phone	Fulfil our contractual obligations towards you.
	Prevent, discover, investigate criminal offences (including fraud)	Comply with applicable laws.
	Comply with applicable laws and regulatory obligations.	Comply with applicable laws.
Information enabling us to provide products and services	Calculate insurance premium, offering and accepting insurance cover, offering renewal and informing of changes in the insurance	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; or
	Perform claims handling and / or complaints management.	ANV legitimate interests of improving its products, development of its systems and to offer you relevant insurance products.
Financial information and account details	Calculate insurance premium, offering and accepting insurance cover and offering renewal	Fulfil our contractual obligations towards you.
	Perform claims handling and / or complaints management	Fulfil our contractual obligations towards you.
Sensitive information	Calculate insurance premium, offering and accepting insurance cover, offering renewal and informing of changes in the insurance.	Consent; and/or

	Claims handling	Necessary for an insurance purpose and in the substantial public interest (UK only)
Information which is necessary to discover, prevent or investigate fraud or investigations towards financial sanctions lists	Discover, prevent or investigate fraud or investigations towards financial sanctions lists.	Comply with applicable laws
Telephone recordings	Document agreement, quality improvement, educational purposes and security (for example, with respect to recorded or monitored phone calls to our contact numbers) and managing complaints.	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; or
		ANV legitimate interests of improving its products, development of its systems and to offer you relevant insurance products.
Marketing preferences	Marketing activities (including information about other products and services which is offered by us or our business partners) in accordance with your preferences.	Consent.



4. DISCLOSURE OF YOUR PERSONAL DATA

To enable us to provide you with insurance, to manage claims and to support our general business activities and regulatory obligations, we disclose your data to; (a) companies within the ANV Group; (b) external parties or our businesses partners who are involved in offering products and services to you; (c) our service providers; and (d) governmental or other public authorities. These categories include:

- **Companies within ANV Group** – You will find a list of companies included on the ANV Group website.
- **Distribution partners** – Insurance intermediary and tied agents, brokers, affinity/business partners and other distributors, reinsurers, administrators, financial institutions and other business partners.
- **Our service providers** - External service providers, such as business and credit scoring companies, medical professionals, accountants, actuaries; call center service providers; auditors, experts, lawyers and other outside professional advisors; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions; third-party claim administrators; claim investigators and adjusters; and outsourced service providers that assist us in carrying out business activities.
- **Governmental or other public authorities** – ANV may share personal data with governmental or other public authorities (including, but not limited to supervisory authorities, courts, law enforcement, tax authorities and criminal investigations agencies and to authorities we are obligated to provide information to).

ANV may also disclose your personal information:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If any ANV company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- In order to enforce or apply our terms of use set out in the terms of use or terms and conditions page and other agreements; or to protect the rights, property or safety of ANV, our customers or others.

5. INTERNATIONAL TRANSFERS OF DATA

For the purposes stated above, and where applicable, we may transfer your personal data to destinations outside the European Economic Area (“EEA”). Where we transfer your personal data outside of the EEA, we will ensure that it is treated securely, and in accordance with this privacy notice and the Legislation. We only transfer data to countries deemed as having adequate protection by the European Commission or, where there is no adequacy decision, we use the European Commission approved ‘Standard Contractual Clauses’ with such parties to protect the data. A copy of the ‘Standard Contractual Clauses’ can be obtained by writing to The Data Protection Officer at the address detailed in Section 11.

6. YOUR RIGHTS

You have the right to:

- a) **Refuse/change marketing preferences** – You may at any time ask us not to process your data for marketing purposes or change your preferences for marketing.
- b) **Request copy of personal data we hold about you** – You may request access to the personal data that we store about you.
- c) **Erasure of personal data** – Under certain circumstances, such as when you have revoked your previously given consent and there is no other legal ground available for us to process your personal data, you may request to have your personal data erased. In some cases, we may have the right to retain certain personal data despite your request of erasure.
- d) **Correction** - You have the right to request correction of or erasure of inadequate, incomplete or incorrect personal data.
- e) **Restriction and object to future processing** - You are under certain circumstances entitled to restrict the processing of your personal data to only comprise storage of the personal data, e.g. during the time when we assesses whether you are entitled to have personal data erased in accordance with (c) above. If the processing of your personal data is based on a balancing of interests and you deem that your integrity interest overrides our legitimate interest to process your personal data, you may also, on grounds related to your particular situation, object to the processing by contacting Controller on the contact details stated below, in which case ANV must have a compelling reason in order to continue to process the personal data for the relevant purpose.
- f) **Data portability** - When personal data is processed electronically, and on the basis of your consent or on the basis that the processing is necessary in order to perform under a contract with you, and provided that the personal data have been provided or generated by you, you are entitled to receive a copy of your personal data in a common machine-readable format.
- g) **Not be subject to fully automated decision-making, including profiling** - If a decision is made, using automated means, which has legal effects or significantly affects you, you have the right to object to the processing in certain circumstances. This right does not apply if the decision-making is necessary in order to perform under a contract with you, if the decision-making is permitted under applicable law or if you have provided your explicit consent.
- h) **Complain to the supervisory authority** – You are welcome to contact us with any enquiries and complaints that you may have regarding the processing of your personal data. You also have the right to lodge complaints pertaining to the processing of your personal data to the local Data Protection Authority. We would request that you contact ANV in the first instance so that we may try to resolve your complaints as quickly as possible. For ANV in the UK, the relevant Data Protection Authority is the Information Commissioner's Office (ICO). Website: <https://ico.org.uk/>. For ANV in Spain, the relevant Data Protection Authority is **AEPD** <https://www.aepd.es> .
- i) **Withdraw consent** - If we rely on your consent as our legal basis for using your personal data, you have a right to withdraw your consent to such use.



To exercise any of your rights listed above, please write to The Data Protection Officer at the address detailed in Section 11.

7. COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For example, we are interested in the number of visitors and the pages they visit; which pages are most and least popular. By applying what we learn about site visitor habits, we can adapt the content to try and make it more easily accessible, relevant and interesting to site visitors. In some cases, cookies are used to remember information about your visit to our site between visits. We may need to do this to improve your use of the web site, such as remembering any feature preferences. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Preference cookies.** These are cookies used to remember information about your visit to our site between visits. We may need to do this to improve your use of the web site, such as remembering any feature preferences.
- **Analytical/performance cookies.** They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Marketing cookies.** These are cookies used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

The cookies we use do NOT hold any personally identifiable data about you, such as:

- Names
- Phone Numbers
- Email Addresses
- Mailing Addresses
- Bank Account Numbers
- Credit Card Information

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Please refer to your browser's 'help' facility on how to configure accepting cookies. For more



information on cookies and deletion of cookies please visit:

www.allaboutcookies.org/manage-cookies.

8. MARKETING

Where you have provided consent, we may contact you (by mail, e-mail, telephone, text, or other agreed means) in order to tell you about products, services or offers that we believe will be of interest to you, or to provide you with commercial updates. If you do not wish us to continue marketing to you, please let us know.

9. RETENTION

Your data will not be retained for longer than is necessary, and will be managed in accordance with our data retention policy. In most cases the retention period will be for a period of ten (10) years following the expiry of the insurance contract, or our business relationship with you, unless we are required to retain the data for a longer period due to business, legal or regulatory requirements. In any case, where data is retained we will endeavour to delete or to anonymize any personal elements, in order to maintain your privacy and security.

10. CHANGES TO OUR PRIVACY POLICY

We may revise the privacy policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make.

11. QUESTIONS IN RELATION TO OUR PRIVACY POLICY OR USE OF YOUR DATA

If you have any questions concerning our privacy policy or our use of your personal data, including exercising your rights detailed in Section 6, you can contact the Data Protection Officer.

The Data Protection Officer, ANV Global Services Ltd, Exchequer Court, 33 St. Mary Axe, London, EC3A 8AA or email at: Privacy@anv.eu.com

The Data Protection Officer, ANV Specialty Europe and ANV Specialty Spain, Calle Sancho de Ávila 47, 1B, 08018, Barcelona, Spain or email at: Privacy@anv.eu.com