

# Important Information

Barclays Home Insurance is provided by Gresham Insurance Company Limited, which is an Aviva Company.

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## Gresham's Regulatory Status

Gresham are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. They are registered as Gresham Insurance Company Limited, Registered Office: 8 Surrey Street, Norwich, Norfolk NR1 3NG, Registered No. 110410, Their Financial Services Register number is 202160.

You may check this information and obtain further information about how the Financial Conduct Authority protects you by visiting [www.fca.org.uk](http://www.fca.org.uk) or by contacting them on 0800 111 6768.

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## Data Protection – Privacy Notice

### Personal Information

The data controller responsible for this personal information is Aviva Insurance Limited as the insurer of the product. Additional controllers include:-

- Barclays Group who are responsible for the sale and distribution of the product; and
- any applicable reinsurers.

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

### Personal information we collect and how we use it

The Insurer will use your personal information:-

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

As well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.

The personal information we collect and use will include name, address, date of birth, financial information and details of your home. If a claim is made we will also collect personal information about the claim from you and any relevant third parties. We may also need to ask for details relating to the health or any unspent offences or criminal convictions of you or somebody else covered under your policy. We recognise that information about health and offences or criminal convictions is particularly sensitive information. Where appropriate we will ask for consent to collect and use this information.

If we need your consent to use personal information, we will make this clear to you when you complete an application or submit a claim. If you give us consent to using personal information, you are free to withdraw this at any time by contacting us (see "Contacting us" section). Please note that if consent to use information is withdrawn we may not be able to continue to provide the policy or process claims and we may need to cancel the policy.

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

Some of the information we collect as part of this application may be provided to us by a third party including the Barclays Group of companies. This may include information already held about you and your home within the Aviva group, including details from previous quotes and claims, information we obtain from publicly available records, our trusted third parties and from industry databases, including fraud prevention agencies and databases.

### Credit Reference Agency Searches

To ensure the Insurer has the necessary facts to assess your insurance risk, verify your identity, help prevent fraud and provide you with our best premium and payment options, the insurer may need to obtain information relating to you at quotation, renewal and in certain circumstances where policy amendments are requested. The insurer or its agents may:

- undertake checks against publicly available information (such as electoral roll, country court judgments, bankruptcy orders or repossessions(s)). Similar checks may be made when assessing claims.
- carry out a quotation search from a credit reference agency (CRA) which will appear on your credit report and be visible to other credit providers. It will be clear that this is a quotation search rather than a credit application.

Where you agree to pay monthly under an Aviva credit agreement, the status of your quotation search from the insurer's credit reference agency (CRA) will be updated to reflect your credit application and this will be visible to other credit providers. CRA's may keep a record of this search.

In order to assess your application the insurer will supply your personal information to our CRA and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. We will also continue to exchange information about you with CRA's on an on-going basis, including about your settled accounts and any debts not fully repaid on time. CRA's will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identity of our CRA and the ways in which they use and share personal information, are explained in more detail at [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain)

### Automated decision making

We carry out automated decision making to decide whether we can provide insurance to you and on what terms, deal with claims or carry out fraud checks. In particular we use an automated underwriting engine to provide a quote for this product, using the information we have collected.

How we share your personal information with others

We may share your personal information:-

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

Some of the organisations we share information with may be located outside of the European Economic Area ("EEA"). We'll always take steps to ensure that any transfer of information outside of Europe is carefully managed to protect your privacy rights. For more information on this please see our Privacy Policy or contact us.

### How long we keep your personal information for

We maintain a retention policy to ensure we only keep personal information for as long as we reasonably need it for the purposes explained in this notice. We need to keep information for the period necessary to administer your insurance and deal with claims and queries on your policy. We

may also need to keep information after our relationship with you has ended, for example to ensure we have an accurate record in the event of any complaints or challenges, carry out relevant fraud checks, or where we are required to do so for legal, regulatory or tax purposes.

### Your rights

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

### Contacting us

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

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

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## Fraud Prevention and Detection

In order to prevent and detect fraud Gresham may at any time:

- Share information about you with other organisations and public bodies including the Police;
- Undertake additional fraud searches;
- Check and/or file your details with fraud prevention agencies and databases, and if you give Gresham false or inaccurate information and Gresham suspect fraud, Gresham will record this.

Gresham can supply on request further details of the databases they access or contribute to. If you require further details, please contact them.

Gresham and other organisations may also search these agencies and databases to:

- Help make decisions about the provision and administration of insurance and related services for you and members of your household;
- Trace debtors or beneficiaries, recover debt, prevent fraud and to manage your accounts or insurance policies;
- Check your identity to prevent money laundering, unless you furnish Gresham with other satisfactory proof of identity.

### Claims History

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

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

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## If You Have a Complaint

Gresham hope that you are very happy with the service they provide. However, if for any reason you are unhappy with it, Gresham would like to hear from you. In the first instance, please write to Barclays Customer Service Centre, PO Box 7463, Perth PH2 0YX or call 0800 051 3533, whichever suits you and ask your contact to review the problem. Gresham are covered by the Financial Ombudsman Service. If you have complained to Gresham and your complaint has not been resolved to your satisfaction, you may refer it to the Financial Ombudsman Service. Following the complaints procedure does not affect your right to take legal action.

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## Choice of Law

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

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

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## Renewing Your Insurance

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

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

If you wish to make any changes at renewal, please call 0800 051 3533.

Or

- (2) let you know that they are unable to renew your insurance. Reasons why this may happen include but are not limited to the following:
  - when the product is no longer available; or
  - when they are no longer prepared to offer you insurance for reasons such as:
    - they reasonably suspect fraud;
    - your claims history;
    - they have changed their acceptance criteria;
    - you are no longer eligible for cover; and/or
    - where you have not taken reasonable care to provide complete and accurate answers to the questions they ask.

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

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## Automatic Renewal of Your Policy

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

Gresham will not automatically renew your policy if:

- you have contacted them to cancel your continuous payment authority since the purchase of your policy or your last renewal; or
- they no longer offer you the continuous payment method you have chosen if, for example, you have a poor payment history or an adverse credit history.

If either of the above happens they will advise you in your renewal letter and you will need to contact them to make payment before they can renew your policy.

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## Ensuring You Have Continuous Cover

If you are considering not renewing with Gresham, make sure you can get the alternative cover you need before your policy ends.

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## Telephone Call Recording

For our joint protection telephone calls may be recorded and/or monitored.