

# Privacy policy

JOHN LEWIS  
MONEY

## 1. Introduction

This document sets out, in detail, the purposes for which we (John Lewis plc) process your personal data. This includes who we share it with, what rights you have in relation to this information, and everything else that we think is important or relevant for you to know. Note that this privacy notice only relates to this home insurance product, John Lewis Home Insurance.

We'll never sell personal data about you to anyone. This includes any personal data given to us about other people named on the policy, quote or claim.

## 2. Who we are and how to contact us

John Lewis Home Insurance is a trading name of John Lewis plc, an appointed representative of Munich Re Digital Partners Limited. John Lewis plc and Munich Re Digital Partners Limited are the data controllers of any personal data given to us about you or other people named on the policy, quote or claim.

Personal data will be shared with insurers ('the Insurers'), who consider your application, underwrite your policy and deal with any claims made on your policy.

The Insurers will also be data controllers in relation to the personal data they receive from us and any additional information that they may collect about you. They will be responsible for how that information is processed. For more information on how the Insurers use your information and your rights in relation to that information, please refer to their privacy notices (linked to in the table below).

It's your responsibility to let any named person on your policy know who we are, and how this information will be processed.

Below are the contact details for each of the data controllers, along with their role in providing this home insurance product:

Service/product	Company	Privacy notice	Contact details
Distribution (sales, services and amendments) of all products	John Lewis plc	<a href="http://www.johnlewis.com/customer-services/shopping-with-us/privacy-notice">www.johnlewis.com/customer-services/shopping-with-us/privacy-notice</a>	<a href="mailto:dpo@johnlewis.co.uk">dpo@johnlewis.co.uk</a> 1 Drummond Gate, Pimlico, London SW1V 2QQ
Distribution (sales, services and amendments) of all products	Munich Re Digital Partners Limited	<a href="http://www.munichre.com/content/dam/munichre/global/content-pieces/documents/digital-partners/Digital-Partners-EU-Privacy-Notice.pdf/_jcr_content/renditions/original./Digital-Partners-EU-Privacy-Notice.pdf">www.munichre.com/content/dam/munichre/global/content-pieces/documents/digital-partners/Digital-Partners-EU-Privacy-Notice.pdf/_jcr_content/renditions/original./Digital-Partners-EU-Privacy-Notice.pdf</a>	<a href="mailto:p0060006431@munichre.com">p0060006431@munichre.com</a> 1 Fen Court, London, EC3M 5BN

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Service/product	Company	Privacy notice	Contact details
Building and Contents Cover and Home Emergency with Boiler Servicing Cover	Great Lakes Insurance UK Limited	<a href="http://www.munichre.com/content/dam/munichre/contentlounge/website-pieces/documents/Great-Lakes-Insurance-SE-Information-Notice.pdf/_jcr_content/renditions/original./Great-Lakes-Insurance-SE-Information-Notice.pdf">www.munichre.com/content/dam/munichre/contentlounge/website-pieces/documents/Great-Lakes-Insurance-SE-Information-Notice.pdf/_jcr_content/renditions/original./Great-Lakes-Insurance-SE-Information-Notice.pdf</a>	<a href="mailto:dataprotection@glise.com">dataprotection@glise.com</a>  1 Fen Court, London, EC3M 5BN
Legal Expenses Cover	ARAG Legal Expenses Insurance Company Limited	<a href="http://arag.co.uk/privacy">arag.co.uk/privacy</a>	<a href="mailto:dataprotection@arag.co.uk">dataprotection@arag.co.uk</a>  ARAG Legal Expenses Insurance Company Ltd, Unit 4a, Greenway Court, Bedwas, Caerphilly CF83 8DW
ID Theft and Cyber Cover	HSB Engineering Insurance Limited (HSB)	<a href="http://www.munichre.com/hsbeil/en/legal/privacy-statement.html">www.munichre.com/hsbeil/en/legal/privacy-statement.html</a>	<a href="mailto:dataprotection@hsbeil.com">dataprotection@hsbeil.com</a>  HSB Engineering Insurance Limited Chancery Place, 50 Brown Street, Manchester M2 2JT Tel: 0207 264 7000

## Giving someone permission to talk to us about your policy

We can only talk to you about the policy, or someone who we're satisfied you have authorised to talk to us on your behalf, after we have carried out data security checks.

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## 3. When we collect your personal data

Some of the personal data that we process will be collected from you directly, when you request a quote. We'll also enrich that information with data from enrichment providers and other intermediaries, such as credit reference agencies. We only keep the information for as long as it's needed, and have strict controls in place to keep it safe.

We will collect personal data, including contact details about everybody named on your policy, quote, incident or claim when you:

- Ask for a quote or apply for a policy
- When we prepare your renewal quote
- Buy and/or use a product or service
- Ask us a question
- Make us aware of, or we investigate, a claim or incident, including anyone associated with that incident.
- Make a payment
- Update personal details
- Change cover
- Register a complaint
- Take part in market research (e.g. customer satisfaction surveys)
- Update your marketing preferences

When you make a claim, we may ask you to provide information on whether you're vulnerable, or experiencing medical symptoms that could affect how or when we attend to your property. We do this so that we can keep our customers and our suppliers safe.

Without your personal data, we can't provide you with a quote or an insurance policy and it may affect the outcome of any claims you make.

When you contact us, information that you give us will be recorded and stored on our systems. All calls and web chats are recorded. This helps us improve our customer service, train our staff, respond to complaints, and prevent fraud and other financial crime.

Any marketing permissions we collect from you on behalf of the John Lewis Partnership will be in accordance with the John Lewis Privacy Notice.

### Insurance intermediaries/brokers/comparison websites

We'll obtain your information if you request a quote from an insurance intermediary, broker or comparison website, as the information you give to them is passed to us. We'll also provide information back to them (e.g. policy details, claims, payment, and suspected or proven fraud and other financial crime information).

### Claimants

We collect and use information about claimants (including children under the age of 18) and witnesses, in order to process or pursue a claim.

### Other noted parties

A noted party on your policy (e.g. a second policyholder) may notify us of an incident or claim against your policy.

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## Law enforcement and government agencies

Information may be given to us by law-enforcement agencies (e.g. the police) about an incident, which may result in a claim or may affect a policy or ongoing claim.

## 4. What sort of personal data we collect

We use the following information to provide a quote and to administer any policy or claim.

- Individual information – including name, address, marital status, date and place of birth, nationality, employer, job title, employment history, family details and relationship to you.
- Policy information – including information about the quotes and insurance policies you have applied for or taken out.
- Financial information – including premiums and claims paid on your policies, bank account or payment card details, income and other financial information.
- Statutory and anti- fraud information – including credit history, credit score, sanctions and information from anti-fraud databases concerning you.
- We don't store any of the personal data you provide us as part of your payment information. We use a payment provider who adheres to the relevant industry standards for payment processing.

## 5. How and why we use your personal data

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data. These include:

### Consent

In specific situations, we may collect and process your data with your consent.

When collecting your personal data, we'll always make it clear to you which data is necessary in connection with a particular service, and whether we require your consent or not.

### Contractual obligations

We require your personal data to offer you a quote. Once you take out a policy, we'll be delivering a contractual service to you.

In certain circumstances, we need your personal data to comply with our contractual obligations.

### Legal and regulatory compliance

As an appointed representative of a regulated financial services organisation, we're required to comply with legal and regulatory obligations such as the prevention, detection and reporting of financial crime, including fraud.

### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

- We process personal data for legitimate interests, when we have a business reason to do so. This includes (but is not limited to): Developing, improving, and personalising our products, pricing and services.
- Enhancing our customer service, experience, and relationship (e.g. customer and market research, business analysis, providing relevant product and service information).

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- Providing a service that keeps our customers and suppliers safe by identifying when they may be vulnerable or experiencing medical symptoms that could affect us attending a property.
- Helping to detect and prevent fraud and financial crime.
- Developing and improving our administration, security systems and insurance systems.
- Improving the relevance of our advertising and marketing campaigns and identifying advertisement audiences.
- Displaying personalised online advertisements on third-party websites and social media platforms.
- Sharing data with third parties in the event of organisational change (e.g. if we bought or merged with another organisation).
- Sharing personal data with other Group companies, insurers and reinsurers.
- Direct marketing performed by the John Lewis Partnership in accordance with the John Lewis Privacy Notice.

## 6. How we protect your personal data

Your privacy is important to us, and we follow strict security and organisational procedures at all points in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access to, or loss of, your information.

## 7. How long we keep your personal data

We'll only keep your personal data for as long as we need it, and will ensure its securely destroyed when it is no longer required.

However, we do need to keep certain information for certain periods, as detailed below.

If you request a quote, we'll keep all personal data for 13 months after the end of the quote validity period. After this, we will delete the data.

To ensure we meet our statutory and regulatory obligations and to allow us to manage complaints, claims and prevent fraud or financial crime, we keep policy data for seven years after the policy termination or expiration. After this, we'll either anonymise, delete or aggregate the data.

Where policies include Employers' Liability Cover, we have a statutory obligation to keep this data for 40 years.

In exceptional cases, we may need to keep claim information for a longer period of time (e.g. when requested by a court of law, or where serious injury has occurred and there's potential need to provide life-long care to an injured person, or asbestos-related claims).

Where remediation work for a claim is backed by long-term guarantees (e.g. flood, subsidence claims), we'll keep claim information for at least the period of the guarantee (up to 10 years).

## 8. Who we share your personal data with

### Data processors

We'll use third parties to process personal data on our behalf. We'll have a contract in place with these third parties, placing obligations on them to keep your information secure and to only use it for the purposes that we prescribe. By way of example, these third parties may include IT service providers or market research agencies.

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## Financial crime and Fraud prevention agencies

Personal data about any customer, third party or representative that we've collected will be shared with crime and fraud prevention agencies. We'll use this information to prevent financial crime and fraud, and to verify your identity.

If financial crime or fraud is detected, you could be refused certain services. Where we suspect financial crime or fraud, we may cancel any policies you have with us, retain any premiums paid, be unable to pay any claim or be unable to offer you the requested product or service.

## Regulatory bodies

Personal data may be disclosed, as required, to regulatory bodies such as the Financial Conduct Authority (FCA), Information Commissioner's Office (ICO) and Financial Ombudsman Service (FOS) to monitor and enforce our compliance with any regulatory matters.

## Incidents or claims

When we're notified of a claim, we'll share this information with agencies and service providers that deal with claims. We'll keep this information updated as the claim progresses and is settled. This includes details of any persons involved in the incident or claim and details of the policyholders. We'll also collect information, including CCTV or images where necessary, from anyone relevant to the claim (e.g. claimant, witnesses, fire brigade or police).

## Credit reference agencies (CRA)

In order to process your quote or renewal, we'll provide information about you and anyone on the policy to credit reference agencies (CRAs). They will provide us with information, such as financial history. We do this to assess creditworthiness and affordability, check identity, make pricing and underwriting decisions, manage policies, trace and recover debts, and prevent fraud and other financial crime.

We'll also exchange information with CRAs on an ongoing basis, including settled accounts and any debts not fully repaid on time. CRAs will share personal data with other organisations. This information will also be linked to the information of any joint applicants or other financial associates.

The identities of the CRAs and the ways in which they use and share personal data are explained in more detail at [experian.co.uk/legal/crain/](https://experian.co.uk/legal/crain/) (external website).

## Specialist services we use

We use other companies to provide services, e.g. banks and building societies, home emergency agents, claim adjusters, claim suppliers, legal service providers, communication services, debt-recovery agencies, marketing agencies, fraud- and other financial crime-investigation services, etc.

## Insurers

We collect and share your personal data with insurers if you make a claim, to verify that the information you've provided is correct and prevent financial crime and fraud. If you move to a new insurer we may confirm certain details about your insurance to them.

## 9. Where your personal data may be processed

To ensure your personal data is always governed by an adequate level of data protection, we aim to keep it within the UK and EEA (European Economic Area).

Should your personal data be disclosed to companies within our group or to service providers outside the UK or EEA, we ensure that there's an adequate level of data protection in place and that this will be adhered to by these parties.

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You can find out the details of any other party we've shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this Privacy Notice.

## 10. Your rights over your personal data

### You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- The deletion of the data we hold about you, in specific circumstances; for example, when you withdraw consent or object (and we have no legitimate overriding interest) or once the purpose for which we hold the data has come to an end (such as the end of a warranty).
- The right of data portability. We may provide a computer file in a common format (CSV or similar) containing the personal data that you've previously provided to us. You also have the right to have your information transferred to another entity, where this is technically possible.
- Restriction of the use of your personal data, in specific circumstances, generally while we're deciding on an objection you've made or where we're correcting inaccurate information.
- That we stop processing your personal data, in specific circumstances; for example, when you have withdrawn consent or object for reasons related to your individual circumstances.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- Review by an individual of any decision made based solely on automatic processing of your data (so where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time by completing an online form.

If we choose not to action your request, we'll explain the reasons for our refusal.

Once we have all the information needed to process your rights request, we'll respond within one month unless your request is very large or complex, in which case we may need to extend this period. If we need to do this we will let you know.

If you want to make a rights request in relation to personal data that's held by the Insurers then you will need to contact them directly, using the contact details under 'Who we are and how to contact us'.

### Automated decision making and profiling

We use automated decision making to help determine the prices, policy terms and relevant products/services when you ask for a quote, buy insurance, make any changes to your policy, renew or make a claim.

We may also profile you based on personal data provided by third parties. Profiling is used to enhance our understanding of you and to inform our business decisions (e.g. product design, pricing, customer journeys or market strategy). It may also be used to help determine the likelihood of a claim or policy transaction being fraudulent. Doing all we can to eliminate the possibility of fraudulent claims helps us to keep our prices lower for the honest majority.

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## **Your right to withdraw consent**

Whenever you've given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

You can withdraw consent by contacting our Data Protection Officer using the details in the 'Who we are and how to contact us' section.

## **Checking your identity**

To protect the confidentiality of your information, we'll ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you've authorised a third party to submit a request on your behalf, we'll ask them to prove they have your permission to act.

## **11. Contacting the Regulator**

If you feel that your data hasn't been handled correctly, or you're unhappy with our response to any requests you've made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

You can contact the ICO by calling **0303 123 1113**, or visiting their website [ico.org.uk/concerns](https://ico.org.uk/concerns) (this will open in a new window). Please note, we can't be held responsible for the content of external websites.

This privacy notice was last reviewed/updated on 07.11.22.