



STERLING

Your privacy is important to us

Data protection



This notice tells you how Sterling will deal with your personal information. Sterling is a trading name of Zurich Assurance Ltd. Zurich Assurance Ltd is part of the Zurich Group. Where Sterling introduce you to a company outside the Zurich Group, that company will tell you how your data will be used. Sterling will remain a data controller for administration and marketing purposes.

## **What personal information will you collect about me?**

We will collect and process the personal information that you give us by phone, email, filling in forms, including on our website, and when you report a problem with our website. We also collect personal information from your appointed agent such as your trustee, broker, intermediary or financial adviser in order to provide you with the services you have requested and from other sources, such as credit reference agencies and other insurance companies, for verification purposes. We will also collect information you have volunteered to be in the public domain and other industry-wide sources.

We will only collect personal information that we require to fulfil our contractual or legal requirements unless you consent to provide additional information. The type of personal information we will collect includes; basic personal information (i.e. name, address and date of birth), occupation and financial details, health and family information, claims and convictions information and, where you have requested other individuals be included in the arrangement, personal information about those individuals.

If you give us personal information on other individuals, this will be used to provide you with a quotation and/or contract of insurance and/or provision of financial services. You agree you have their permission to do so. Except where you are managing the contract on another's behalf, please ensure that the individual knows how their personal information will be used by Zurich. More information about this can be found in the 'How do you use my personal information' section.

## **How do you use my personal information?**

We and our selected third parties will only collect and use your personal information:

- where the processing is necessary in connection with providing you with a quotation and/or contract of insurance and/or provision of financial services that you have requested
- to meet our legal or regulatory obligations, or for the establishment, exercise or defence of legal claims
- where you have provided the appropriate consent
- for our "legitimate interests". It is in our legitimate interests to collect your personal information as it provides us with the information that we need to provide our services to you more effectively including providing you with information about our products and services.

We will always ensure that we keep the amount of information collected and the extent of any processing to the absolute minimum to meet this legitimate interest. Examples of the purposes for which we will collect and use your personal information are:

- to identify you when you contact us
- to deal with administration and assess claims
- to make and receive payments
- to obtain feedback on the service we provide to you
- to administer our site and for internal operations including troubleshooting, data analysis, testing, research, statistical and survey purposes
- for fraud prevention and detection purposes.

We will contact you to obtain consent prior to processing your personal information for any other purpose, including for the purposes of targeted marketing unless we already have consent to do so.

## **Use of Artificial Intelligence (AI)**

Zurich may make use of AI-powered tools in the interest of providing a better user experience. These tools will either be developed in-house or by trusted, carefully selected partners. We will ensure that all AI usage follows our Responsible AI principles of safety, transparency, accountability and reliability. We also ensure it is compliant with relevant regulations and industry standards.

## Who do you share my personal information with?

Where necessary, we will share the personal information you gave us for the purposes of providing you with the goods and services you requested with the types of organisations described below:

- associated companies including reinsurers, suppliers and service providers
- introducers and professional advisers
- [Zurich's group companies](#)
- regulatory and legal bodies
- survey and research organisations
- credit reference agencies
- healthcare professionals, social and welfare organisations
- companies who help us maintain, operate and promote our websites
- other insurance companies; and
- fraud prevention and detection agencies

Or, in order to meet our legal or regulatory requirements, with the types of organisations described below:

- regulatory and legal bodies
- central government or local councils
- law enforcement bodies, including investigators
- credit reference agencies; and
- other insurance companies.

We may also share the following information with the types of organisations outlined above, for the purpose of statistical analysis, research, improving services and to measure the effectiveness of marketing and advertising campaigns:

- personal information – limited personal information, such as your name and postcode, but not containing any financial or sensitive details, including health data
- anonymised data – data encrypted to make it anonymous, which protects an individual's privacy by removing personally identifiable information
- pseudonymised data – personally identifiable information replaced with a pseudonym to make the data less identifiable, such as replacing a name with a unique number
- aggregated data – similar groups of data, such as age, profession or income which are expressed as a summary for statistical analysis.

## How do you use my personal information for websites and email communications?

When you visit one of our websites we may collect information from you such as your email address or IP address. This helps us to track unique visits and monitor patterns of customer website traffic, such as who visits and why they visit.

We use cookies and/or pixel tags on some pages of our website. A cookie is a small text file sent to your computer. A pixel tag is an invisible tag placed on certain pages of our website but not on your computer. Pixel tags usually work together with cookies to assist us to provide you with a more tailored service. This allows us to monitor and improve our email communications and website. Useful information about cookies, including how to remove them, can be found on our websites.

## How do you transfer my personal information to other countries?

Where we transfer your personal information to countries that are outside of the UK or European Economic Area (EEA), we will ensure that it is protected and that the transfer is lawful. We will do this by ensuring that where necessary the personal information is given adequate safeguards by using 'standard contractual clauses' which have been adopted or approved by the UK and the EU, or other solutions that are in-line with the requirements of UK and, where applicable, European data protection laws.

A copy of our security measures for personal information transfers can be obtained from our Data Protection Officer at:

Zurich Insurance Group  
Unity Place  
1 Carfax Close  
Swindon  
SN1 1AP

or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

## How long do you retain my personal information for?

We will keep and process your personal information for as long as necessary to meet the purpose it was originally collected.

There are a number of factors influencing how long we will keep this information including:

- complying with applicable laws and regulations or with requirements set out in codes issued by regulatory authorities or professional bodies
- performing our business processes, associated with the type of product or service you have requested
- what types of information that we hold about you
- whether your information relates to any ongoing, pending, threatened, imminent or likely dispute, litigation or investigation
- to enable us to respond to any questions, complaints, claims or potential claims
- if you or a regulatory authority require us to keep your information for a legitimate purpose
- to prevent and detect fraud.

## What happens if I fail to provide my personal information to you?

If you do not provide us with your personal information, we will not be able to provide you with a contract or assess future claims for the service you have requested.

## What are my data protection rights?

You have a number of rights under the data protection laws, namely:

- to access your data (by way of a subject access request)
- to have your data rectified if it is inaccurate or incomplete
- in certain circumstances, to have your data deleted or removed
- in certain circumstances, to restrict the processing of your data
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services
- to object to direct marketing
- not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you
- to claim compensation for damages caused by a breach of the data protection legislation
- if we are processing your personal information with your consent, you have the right to withdraw your consent at any time
- to complain to us about the processing of your personal information.

You can exercise your rights by contacting our Data Protection Officer at Zurich Insurance, Unity Place, 1 Carfax Close,

Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

We will, for the purposes of providing you with a contract of insurance, processing claims, reinsurance and targeted marketing, process your personal information by means of automated decision making and profiling where we have a legitimate interest or you have consented to this.

### How do I contact you?

You can ask for further information about our use of your personal information or complain about its use in the first instance, by contacting our Data Protection Officer at Zurich Insurance, Unity Place, 1 Carfax Close, Swindon, SN1 1AP or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

If you're not happy with the way we're handling your Personal Information, you have a right to make a complaint with your local data protection supervisory authority at any time. In the UK this is the [Information Commissioner's Office \(ICO\)](#). We ask that you please attempt to resolve any issues with us before contacting the ICO.

Details for regional Information Commissioner's offices can be found here <https://ico.org.uk/about-the-ico/who-we-are/>.

Sterling is a trading name of Zurich Assurance Ltd. Registered in England and Wales under company number 02456671. Registered Office: Unity Place, 1 Carfax Close, Swindon, SN1 1AP. Telephone number 0370 909 6010.

We may record or monitor calls to improve our service.

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