

## ING Direct Home Insurance and your personal information

### Who we are

- We, ING Direct N.V. and AXA Insurance UK plc, are both data controllers: we are both responsible for the processing of your information.
  - ING Direct N.V. is a limited liability company incorporated in The Netherlands and active in a number of countries (including the UK). The main business of ING Direct N.V. is providing banking services. It is part of the ING group of companies, a list of which is available on request.
  - ING Direct's home insurance policies are provided by AXA Services Limited and the policies are underwritten by AXA Insurance UK plc. AXA Services Limited is an appointed representative of AXA Insurance UK plc and both of these companies are part of the AXA group of companies. A list of all AXA group companies is available on request.

### Where we obtain your information from

- Apart from the information you give to us and to our agents, we may collect information about you from:
  - Other policyholders you are connected with;
  - Other members of the AXA group of companies; and
  - Other insurers via insurance databases (such as the Claims and Underwriting Exchange Register, which is operated by Insurance Database Services Limited). Details of the databases we use are available on request.
- If you are a joint applicant, you must be sure that you are entitled to:
  - Reveal information about the other people named on your insurance policy (including sensitive information such as information about criminal convictions); and
  - Authorise us to record their information on databases shared with other insurers.

### How we use your information and who we share it with

#### *Managing your policy*

- We may use your information for the purposes of considering applications, underwriting, handling claims and otherwise managing your policy. This may require us to disclose your information to other insurers, investigators, loss adjusters and regulatory authorities.
- To make managing your policy more convenient for you, it is our policy to deal with your spouse or partner who calls on your behalf and anyone else you may specify from time to time. In some exceptional circumstances we may also deal with other people who call us on your behalf. If you would prefer us to deal with only you, please let us know.
- If you have elected to pay by Direct Debit, we will retain your payment details so that we can continue to deduct premiums when your policy is renewed. We will write to you in advance to remind you that this is happening.

#### *Statistical analysis & systems testing*

- We and the operators of the insurance databases we subscribe to, may use your information for statistical analysis about fraud and financial risk assessment.
- We may also use your information for testing our systems. When we do this, we will still keep your information private and confidential and where practical, your information will be anonymised.

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ING Direct Home Insurance is a trading name of ING Direct N.V. Authorised and regulated by De Nederlandsche Bank (the Dutch Central Bank) and subject to limited regulation by the Financial Services Authority. Details on the extent of our regulation by the Financial Services Authority are available from us on request. ING Direct N.V. is a limited liability company incorporated in The Netherlands. Registered in England and Wales at Companies House: Branch reference number: BR7357. ING Direct Home Insurance is underwritten and administered by AXA Insurance UK plc, a member of the AXA Group of companies. Registered Office: 5 Old Broad Street, London, EC2N 1AD. Registered in England No. 78950. AXA Insurance UK plc is authorised and regulated by the Financial Services Authority.

#### *Fraud prevention & checking information*

- When you tell us about an incident (such as fire, water damage or theft) which may or may not give rise to a claim, we may pass information relating to the incident, together with details of your policy, to the Claims and Underwriting Exchange Register (which is an insurance database operated by Insurance Database Services Limited). The information in this register is available to other insurers and their agents, a list of which is available on request. We may also use other insurance related databases in the future.
- We and other insurers may access and use insurance databases to prevent fraud and to check on insurance proposals and claims.
- If false or inaccurate information is provided and fraud is identified, we will record this.

#### *Sensitive information*

- We need to process sensitive information (such as information about criminal convictions) about you and others named on your insurance policy so that we can provide you with insurance. We will use this information for the purposes specified in this document.

#### *Keeping you informed*

- If you have given prior permission, we may occasionally want to tell you about other products and services which may be of interest to you. This could be by letter, phone, mobile phone (including text messages) and e-mail.

#### *Other sharing of information*

- We may also share your information with:-
  - Our agents and service providers who provide a service to us and you;
  - Any person or business (and their advisers) who might take over our rights or responsibilities of our agreement with you to allow them to prepare for taking these over. After that, we may allow that person or business to use and share your information on the same basis as us.
- To provide you with the service you have asked for, we may share your information with organisations outside the European Economic Area (which currently includes the European Union, Iceland, Liechtenstein and Norway). We will not do this unless we are satisfied that your information will be processed as if we were processing it.
- We will not pass your information to anyone outside ING Direct N.V. and AXA Insurance UK plc for the purposes described above, unless:
  - We have your permission;
  - We have to do so or are allowed to do so by law;
  - We have a duty to the public to reveal the information; or
  - Our interests mean we must give the information - for example, to prevent fraud (we will not use this as a reason for giving information about you to anyone else for marketing purposes).

#### **Your rights**

- You have a right to receive a copy of the information we hold about you if you apply in writing. You may need to pay a fee.
- You have a right to stop us contacting you for direct marketing purposes. You may contact us at any time in the future if you want us to stop. However, choosing not to receive marketing information from us will mean that you will not receive details about any of our special offers and promotions.
- If you have any questions about how we use your personal information, please write to us or contact Customer Services on 0845 603 8888.

Please pass on this information to anyone else named on your insurance policy.