



## **PRIVACY STATEMENT- USAA LIMITED**

### **Scope of Privacy Statement**

We are committed to the privacy and confidentiality of your data. This Privacy Statement describes our current policies and practices with regard to processing of Personal Data.

**By purchasing or renewing a USAA Limited policy, you are agreeing to the terms of this Privacy Statement.**

### **USAA Limited**

USAA Limited ("us", "we", "our" and "ours"), a United Kingdom registered general insurance company, is a wholly owned subsidiary of United Services Automobile Association, ("USAA"). USAA Limited is licensed to write insurance in the United Kingdom and within the certain European Union locations through the European Union Freedom of Services legislation. USAA Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

USAA Limited's Registered Office address: USAA Limited, 10 St. Mary Axe, London, EC3A 8AE, England. For purposes of the UK and EU data protection law, USAA Limited is a "Data Controller", which means it is the entity that determines how your Personal Data is accessed and used. For more information about UK Data protection requirements, please refer to the ICO's website: [www.ico.org.uk](http://www.ico.org.uk) or contact them via phone on: +44 303 123 1113. The term "USAA", when used in this Privacy Statement means United Services Automobile Association and its subsidiaries (excluding USAA Limited), divisions, branches, affiliates or companies under the control of USAA, including (USAA Life Insurance Company, USAA Merchandise Services Company, USAA Alliance Services, L.P., USAA Federal Savings Bank and USAA Savings Bank).

### **WHAT IS PERSONAL DATA?**

Personal Data is data relating to an identified or identifiable individual. Sensitive Personal Data is Personal Data revealing a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data, and data concerning health or sex life or sexual orientation.

### **WHAT PERSONAL DATA DOES USAA LIMITED COLLECT?**

#### **1. Collection of Your Personal Data (Including Sensitive Personal Data)**

We may collect Personal Data from different sources. You may choose to buy products from us or receive additional information or services from us. When you purchase or inquire about our products, we request Personal Data about you such as your name, postal address, email address, telephone number and payment details. We may also ask for demographic information to enable us to provide a personalised service to you. The provision of certain of your Personal Data is a contractual requirement. If you do not provide us with Personal Data when requested, we may not be able to enter into a contract with you to offer you our products and services. We also collect Personal Data from third parties, such as government databases and third-party providers who assist us with maintaining the accuracy of our data, determining eligibility for and properly pricing our products and services. The types of Personal Data we obtain from third parties are contact information, driving history and record,

insurance history and record, information about your vehicle, dwelling or other property or item you want to insure, and issues impacting your credit score. The types of third parties from whom we collect Personal Data are government databases, service providers, and companies that provide the data listed above such as data aggregation companies and consumer reporting agencies.

We may also record telephone conversations with you for security purposes, to enable us to respond to customer complaints and for staff training purposes.

## **2. Collection of Personal Data about Other People**

Where you provide us with Personal Data (including any Sensitive Personal Data) about other people (for example, your spouse or children) you confirm that you have obtained their EXPRESS CONSENT to do so and that they are INFORMED OF AND AGREE TO our processing of their Personal Data (including any Sensitive Personal Data) in accordance with the terms of this Privacy Statement.

## **3. Access to Medical Records**

We may need to obtain a medical report in order to facilitate the handling of an insurance claim. We are required by law to obtain that individual's permission before requesting a medical report from their doctor. Failure to give consent may impact the ability for us to deal with the claim.

When dealing with a claim that requires a medical report, that individual will be entitled to view their medical report prior to the doctor sending it to us. We will ask at that time whether the individual wishes to view their medical report and we will notify their doctor of that request. They will have 21 days from providing their consent in which to arrange to view the medical report and discuss it with their doctor. If they believe the medical report is inaccurate, they can request that their doctor amend the report. If the doctor refuses to amend the report, the individual can require that a statement of their view is attached to the report. If they do not make arrangements to see the medical report within 21 days from providing consent, the doctor will send it to us without further notice to them. The individual can request a copy of the medical report from their doctor within 6 months of it being sent to us. The doctor can withhold access to their medical report if the doctor feels such access is likely to cause harm to them or others.

## **4. Additional Data Collected Online**

In addition to the information we collect as described above, we use technology to collect information about the use of our website and other sites you may visit. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which web browsers our visitors use. We also use your IP address to help diagnose problems with our server and to administer our website. An IP address is a numeric code that identifies your computer on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information. We may also perform IP lookups to determine which domain you are coming from (i.e: example.com) to more accurately gauge our users' demographics. Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view.

Third parties, including our service providers, use cookies and other tracking technologies to collect information about your online activities over time and across different websites, including when you visit our website. We also use third-party web beacons on our website and on other sites to assist in managing and optimising our online advertising. We use this information to provide relevant marketing to you when you visit our website or third-party

websites.

In order to collect the data described in the preceding paragraph, we may utilise "session Cookies" that remain in the cookies file of your browser until the browser is closed at the end of your session and "persistent cookies" that remain on your hard drive until you erase them or they expire. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive. Cookies help us determine the effectiveness of various marketing channels, to improve the content of our website and personalise content on our website. Cookies do not damage your computer.

#### **FOR WHAT PURPOSES DOES USAA LIMITED PROCESS PERSONAL DATA?**

<b>Purposes of Processing</b>	<b>Legal Basis for Processing</b>
<b>For our everyday business purposes</b> - to issue your policy, process your transactions and claims, maintain your accounts, report to credit bureaus and facilitate services provided by contracted parties, such as repair shops and mailing services	For the performance of a contract or to take steps to enter into a contract.
<b>For our marketing purposes</b> - to offer products and services provided by USAA Limited	With your consent.
<b>For internal reporting and analytics</b> - to analyze our financial health, forecast profitability, determine trends and otherwise assess our products and services	Legitimate interests - USAA Limited's interest in maintaining financial health, growth and stability.
<b>For compliance with legal obligations</b> - to respond to court orders, government investigations, subpoenas and litigation	Compliance with a legal obligation.
<b>For additional purposes</b> - to process Personal Data in a manner not described in this Privacy Statement	With your consent.

We also process Personal Data about individuals other than USAA Limited members in certain circumstances. For example, to process a claim from a USAA Limited member, we may process Personal Data related to an individual involved in an automobile accident who is not a USAA Limited member. We process this Personal Data to comply with legal and contractual obligations and pursuant to our legitimate interest in fulfilling our contractual obligations to our members. Unless otherwise noted in this Privacy Statement, our processing practices do not differ between member and non-member Personal Data.

To underwrite and price insurance policies, we make certain decisions via automated processing. When you apply for a policy, our algorithms review data we have about you as well as data from third-party sources such as consumer reporting agencies to determine whether you qualify for the product and to appropriately price the product. For example, your premium may be higher for an auto insurance policy if you have an extensive record of automobile accidents and claims. We make these automated decisions because they are necessary to enter into or perform a contract between USAA Limited and our members. You have the right to obtain human intervention and express your point of view with respect to our automated decision-making. To

do so, please contact our Data Protection Officer as described below.

## **WHAT PERSONAL DATA DOES USAA LIMITED DISCLOSE OR SHARE WITH OTHERS?**

### **1. Sharing and Disclosure of Your Personal Data**

We do not share, sell or distribute your Personal Data with third parties, except as otherwise provided for in this Privacy Statement.

For the purposes of the processing identified above, we transfer or share Personal Data with third-party service providers, such as other companies within our family of companies, including those in the United States of America. These third-party service providers process Personal Data for our benefit and on our behalf in accordance with the purposes for which the data was originally collected or for purposes to which you have subsequently consented. For example, sometimes a third party may have access to your Personal Data in order to support our information technology functions, assist with underwriting reviews or to handle mailings on our behalf.

We may also share, transfer or disclose Personal Data to comply with a legal requirement, for the administration of justice, interacting with anti-fraud databases or for other actions to prevent fraud, to protect your vital interests, to protect the security or integrity of our databases or this website, to take precautions against legal liability, in the event of our sale, merger, re-organisation, dissolution or similar event, to process your transactions, to service your accounts and for other routine business purposes. The types of third parties who may receive Personal Data in these circumstances are parties to a litigation, USAA Limited service providers, government entities, and third parties involved in a sale, merger, re-organisation or similar event. We will inform you of any such transfer or disclosure to the extent required by law.

Your Personal Data may be added to the national insurance database run by government affiliated organizations, of the country of vehicle registration, for the confirmation of active auto insurance. This data may be used by law enforcement for the purposes of establishing whether a driver's use of the vehicle is likely to be covered by a motor vehicle insurance policy and/or for preventing and detecting crime. If you are involved in an accident, other insurers (including those of other countries) and the local insurance bureau may search these databases to obtain relevant policy information to assist in the handling of a claim.

### **2. Transfer of Data Abroad**

To allow us to issue and administer your policy we will transfer your Personal Data abroad. When we transfer your Personal Data outside of the European Economic Area or another jurisdiction deemed to provide "adequate" protection by the European Commission, we will do so in accordance with applicable data protection law using a valid cross-border transfer mechanism. Our transfer of Personal Data to the USAA entities in the United States is based on controller-to-processor standard contractual clauses. Our transfers to other jurisdictions, such as India, also are based on standard contractual clauses. If you would like to obtain a copy of our relevant standard contractual clauses, please contact our Data Protection Officer as described below.

If you are visiting USAA's website, [usaa.com](http://usaa.com), from any country outside of the United States of America, then this will result in the transfer of information across international boundaries. USAA's servers are located in the United States of America.

## **WHAT ARE YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA?**

You have the right to request access to and rectification or erasure of your Personal Data; the restriction of the processing of your Personal Data; or to object to the processing of your Personal Data in accordance with applicable data protection law. You also have the right to data portability in accordance with applicable data protection law. In addition, you may withdraw any previously provided consent at any time. If you want to exercise any of these rights, you may write to us at USAA Limited, ATTN: Data Protection Officer 10 St. Mary Axe, London, EC3A 8AE, England or email us at [Group\\_londonadminsvc@usaa.com](mailto:Group_londonadminsvc@usaa.com), ATTN: Data Protection Officer.

We will respond to your request in accordance with applicable law. If we cannot resolve your request to your satisfaction or you have other concerns regarding our processing of your Personal Data, you may lodge a complaint with our supervisory authority.

## **HOW CAN YOU CHANGE HOW USAA LIMITED USES YOUR PERSONAL DATA?**

### **1. To limit our marketing to you:**

With your consent, we may, from time to time, email or mail you information to make you aware of our other products and services which may be of interest to you. If you do not wish to receive emails or post from us for these purposes, please email us at the address given below under "Feedback" indicating in the subject heading "Email Unsubscribe," for emails, or "Do Not Solicit," for post.

We hope you will be delighted with our products and services. However, if you do not wish to receive marketing emails from us and want to be removed from our electronic mailing list, please email or write to us with "Email Unsubscribe" in the subject heading using the addresses in Contact USAA Limited given below.

If you wish to be removed from our postal marketing database, please email or write to us with "Do Not Mail" in the subject heading using the addresses in Contact USAA Limited given below.

If you do not wish to receive any direct marketing from us, please email or write to us with "Do Not Solicit" in the subject heading using the addresses in Contact USAA Limited given below.

Please include your USAA number in the body of the email or letter so that we may apply your request to your records.

### **2. Disabling or Enabling Cookies**

You can set your browser to notify you when you receive a cookie so that you may accept or decline the cookie. The IAB website at [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies) tells you how to manage cookies on your browser.

## **HOW LONG IS YOUR PERSONAL DATA STORED?**

We store records containing Personal Data in accordance with our retention schedule. Pursuant to our retention schedule, we store the majority of our policy service records for twelve years, but certain policy service records are retained for different time periods. We also generally store claims records for seven years after the claim is closed. Under our retention schedule, we may

store Personal Data (outside of insurance records) for longer periods for legal and compliance reasons, to protect against fraud and to pass down USAA membership. For more information about our retention schedule or practices, please contact us as described below.

## **CONTACT USAA LIMITED**

If you have any questions about this Privacy Statement or any part of our service, you may contact us by emailing [Group\\_LondonAdminSVC@usaa.com](mailto:Group_LondonAdminSVC@usaa.com) or in writing to our registered office: USAA Limited, 10 St. Mary Axe, London, EC3A 8AE, England. To speak to a representative, call: 00-800-531-81110 - Option 2. To contact our Data Protection Officer ("DPO") or the DPO's delegate, please include ATTN: Data Protection Officer in your correspondence or indicate to the representative that your question or comment is for the DPO.

## **NOTIFICATION OF CHANGES TO PRIVACY STATEMENT**

We are continually improving our methods of communication and adding new functionality and features to this website and to our existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data practices will change from time to time. If and when our data practices change, we will notify you and the local data authority where required by law. We encourage you to check this page frequently.