

Sun Life Assurance Company of Canada (U.K.) Limited

Customer Data Protection Notice

Protecting your privacy

We are committed to protecting and respecting your privacy. This notice tells you more about how we process the Personal Data we hold about you and how we maintain the privacy, accuracy, and confidentiality of your data.

Personal Data is a term from the Data Protection Act 2018 (Act) and UK General Data Protection Regulation (UK GDPR). It means information we hold about you that we can use to identify you as an individual.

This notice applies to the data we collect, use and process about you because you are our customer, or because you are a third party associated with one of our policies, for example a trustee or a beneficiary.

What data do we collect and process?

We collect and process the following categories of data about you. We will only collect the data that is relevant to supplying your policy or providing you with customer service:

- personal information, such as name, gender, date of birth, address and personal contact details. We collect this data in all cases
- financial information such as bank details. We need this for you to pay premiums and for us to pay you
- information about your job, such as your job title, employment status, business activities, salary, and taxes. We are likely to collect this data if you are a member of a workplace pension scheme with us or have a personal health insurance policy
- family details such as details of your beneficiaries and dependants. This may include your marital status. We collect this data to show who you wish to get any benefits from your policy if you die. Collecting this data will depend on the type of policy you hold with us
- lifestyle and health information. This is sensitive personal data. We collect this type of data if you make a claim on your policy but we will always ask for your consent. We will also collect certain lifestyle information, such as whether or not you are a smoker, and certain health details when you take out some policies, for example, if you have a personal life insurance policy.

We do not collect criminal conviction data in every case but might collect it in the course of preventing or detecting fraud.

How is your Personal Data collected?

We use different methods to collect data from and about you including through:

- direct interactions. You may give us your personal information such as name, gender, date of birth, address and personal contact details by filling in forms or by corresponding with us by post, phone, email or otherwise
- third parties or publicly available sources. We may receive personal data about you from various third parties and public sources such as from:
 - service providers
 - financial organisations and advisers
 - healthcare, social and welfare advisers or practitioners
 - your family, associates and representatives
 - your past or current employer, for workplace pension schemes
 - Central Government, including HM Revenue and Customs (HMRC)
 - ombudsmen and regulatory authorities
 - credit reference agencies

What do we use your data for?

We use your data to:

- process your application
- set up, administer and manage your policy (including, but not limited to, underwriting, processing, providing customer service, claims handling and paying you)
- give you, or another person you have authorised, information about changes to your policy, or to legislation, and to answer your questions
- check your identity to protect you and your money from fraud
- comply with our regulatory and legal obligations, such as tax reporting to HMRC, and
- make sure we understand our customers so we can meet your needs.

We do not use your data for marketing. We do not sell your data or use it to make automated decisions about you, for example we do not ask you to enter personal data into quote tools on our website. We do not use your data to build up a profile of our customers.

The legal basis for processing your data

Data protection law allows us to collect and process your data for a number of reasons. We process your personal data when you have given your consent for us to do so. We also process it to fulfil our obligations under our contract with you and to comply with our own regulatory and legal obligations.

For example, we process your date of birth to check your identity and to make sure you are eligible for your pension policy benefits, and we process your National Insurance number to meet HMRC requirements.

We also process your data when it is necessary for our legitimate business interests, including preventing fraud and ensuring network and information security. We will not use your data for our business interests if doing so would override your interests and fundamental rights and freedoms.

Who do we share your data with?

We will only share your data if we need to, to manage your policy and your benefits and to comply with our regulatory and legal requirements.

We may share your data with other Sun Life and Phoenix Group companies and the following third parties:

- service providers
- financial organisations and advisers
- healthcare, social and welfare advisers or practitioners
- your family, associates and representatives
- your past or current employer, for workplace pension schemes
- Central Government, including HMRC
- ombudsmen and regulatory authorities
- credit reference agencies, for the purpose of tracing and identity verification services. **Note:** we only use these services to make sure you get every benefit you're owed and to keep you safe from identity theft and fraud. We do not share your data for credit reporting or debt recovery purposes.

Please click on the following links for further details about the credit reference agencies we use and how they use the information we share:

- a) TransUnion privacy notice: <https://www.callcredit.co.uk/legal-information/bureau-privacy-notice>
- b) Experian privacy notice: <https://experian.co.uk/crain/index.html>

We will also give your information to the police, or in response to a court order, if we are required to do so by law.

We require third parties to respect the security of your data and to treat it in accordance with UK GDPR and the Act. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-

party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We may transfer your data to Sun Life entities and service providers in other countries, including outside the United Kingdom. We have physical and technical safeguards to protect your data when it is in other countries and have in place appropriate measures to ensure that your data is treated in a way which is consistent with and which respects UK law on data protection.

If you have any questions or wish to be provided with a copy of these protective measures and the relevant security measures please contact the Data Protection Officer. Please note commercially sensitive information may be removed/blanked out from copies supplied to you.

Keeping your data

We only keep your data for as long as we need to, to fulfil the purposes we collected it for, and for regulatory and compliance purposes.

Your rights

If you have given us consent to process your data, you have the right to withdraw this consent. We might still need to process your data even if you withdraw your consent, for example if we need it for HMRC reporting. If we do need to keep your data after you have withdrawn consent, we will tell you.

You have the right to:

- see the data we hold about you
- require us to correct inaccurate data about you
- ask us to restrict or stop processing your data, or to object to your data being processed
- ask for your data to be deleted, this is also known as the right to be forgotten, and
- ask us to send you, or another organisation you have chosen, for a copy of your data in a commonly used machine readable format

We will not charge you to exercise any of these rights.

Please contact the Data Protection Officer if you want to exercise your rights or have any questions.

If you choose to exercise some of these rights, we may not be able fulfil our obligations to you. We may refuse the request if we think it will stop us fulfilling our obligations. For example, if you ask us to delete your data, this might mean we cannot pay you the money from your policy.

Your right to complain

You have the right to complain to the Office of the Information Commissioner if you are unhappy with the way we have processed your data. Complaining to the Information Commissioner does not affect your right to make other administrative or legal complaints about your data. You can contact the Information Commissioner at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

You can also contact the Information Commissioner through their website: ico.org.uk

Security

We use appropriate technical and physical security measures to protect the data we send, store or process about you. We protect your data from being accidentally or unlawfully destroyed, from being lost or altered, or being shared with or accessed by anyone who is not authorised to do so. These measures include physical, logical and data security controls set out in our risk policies and operating guidelines. We choose the service providers with access to your data carefully. We do a detailed privacy risk assessment before appointing a new provider, and they are contractually required to protect your data. We continually review our security arrangements and will put additional security in place if we need to.

We are here to help

If you have any questions about this notice or how we treat your Data, please email the Sun Life Data Protection Officer on UK.Data.Protection@sunlife.com or write to: The Data Protection Officer, Sun Life Assurance Company of Canada (U.K.) Limited at Matrix House, Basing View, Basingstoke, Hampshire RG21 4DZ. If you are located inside the European Economic Area (EEA), you may if you prefer, contact our appointed representative in the EEA at: The Data Protection Officer, Sun Life Information Services Ireland Limited, 324, IDA Industrial Park, Cork Rd, Waterford, Ireland. Or by email to: uk.eurepresentative@sunlife.com

We will publish any changes to this notice on our website, sloc.co.uk. You can ask the Data Protection Officer for a copy at any time. Your data is held by Sun Life Assurance Company of Canada (U.K.) Limited, a private company incorporated in England and Wales (Company Number 00959082) and having its registered office address at Matrix House, Basing View, Basingstoke, Hampshire, RG21 4DZ. Sun Life Assurance Company of Canada (U.K.) Limited is the Controller for the purposes of the Act, UK GDPR and any subsequent amendments.

Sun Life Assurance Company of Canada (U.K.) Limited, incorporated in England and Wales, registered number 959082, registered office at Matrix House, Basing View, Basingstoke, Hampshire, RG21 4DZ, trades under the name of Sun Life Financial of Canada and is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority