

SunLife Privacy Notice 2021

Your privacy and security are very important to us.

1. Information summary
2. **Why** do we need your personal information?
3. **What** details do we collect – and how do we get them?
4. **Who** might use your personal information?
5. **How** can I stay in control of my own data?

1. Information summary

We are SunLife Limited, and we sell financial products and services. This privacy notice explains what, how and why we use any personal information we collect about you.

SunLife Limited is part of The Phoenix Group. When you buy a Guaranteed Over 50s Plan or Funeral Plan, you will be buying from Phoenix Life Limited, trading as SunLife. To help them set up and look after your policy, we will share the personal information that we collect from you. When you take out another product or service we sell, you will be buying from one of our carefully selected third party partners – and so we will share your details with them.

We also buy basic personal details of potential customers from specialist companies for marketing purposes. This can include data taken from publicly available sources, such as online registers and directories, plus social media and news sources.

Keeping in touch and sending you marketing messages

For certain products and services, we may send you service messages by post, email, text, social media and other electronic methods. These will be official admin messages linked to your policy - reminding you of any benefits you may or may not have or when payments have been missed. You will not be able to opt-out of receiving these essential service communications.

We may sometimes send marketing material or promoted messages that we believe will be of interest to you. We may contact or market to you by post, telephone and (where we have your permission) by email and social media. The way we use your data for marketing will change, depending on whether you are enquiring, an existing customer, a previous customer or a potential customer. In any of these cases, if you do not want to receive marketing from us, please contact us using the details at the end of this notice.

Legal basis for using your information

We will only collect, use and share your information where we have a valid reason to do so under data protection legislation.

We have 4 main reasons for using your information:

1. **Contract** – we may need to process your details to meet contractual requirements before agreeing a contract. For example, when giving you a personal quote.
2. **Legal commitment** – we may need personal information from you to meet our legal obligations. For example, proof of identity to check against fraud.
3. **Our business interests** – we may use your information to help us manage and improve our business. For example, to help us offer even better products and services to you and other customers, follow up on a query or quote you have made, or offer marketing that we think will be of interest to you and make you aware of new products and services. We will only do this where we believe our business interests do not override your right to privacy.

4. **Consent** – we may need to get your permission to receive future marketing from us. For example, if we wish to market you by email or other electronic means. If we ask for this, you have the right to withdraw your consent at any time. You can call 0800 904 7678 to update your details or marketing preferences.

2. Why do we need your personal information?

Why is it important?	A few examples...
<p>We want to help you</p>	<ul style="list-style-type: none"> • It will help with assessing and processing your application and we can respond to your requests and questions • It will help us to contact you when you do not complete a web application • Your personal information will help us to manage our relationship with you – tracing you when we've lost touch and making sure you get any product updates • We can contact you when payments have been missed
<p>We want to improve</p>	<ul style="list-style-type: none"> • We can use customer data to improve and maintain our products, services and systems • It will help maintain service quality. For example, calls to our call agents that may be monitored and/or recorded for authentication, security, quality and training purposes • We may invite you to take part in a customer panel or research group looking at our products or services
<p>We want to understand our customers</p>	<ul style="list-style-type: none"> • We group and organise our customer information to help develop offers, products and services to provide you with the best customer experience • This is known as marketing profiling • We do not use profiling to make decisions about you which have legal or other significant effects • If we profile your data, this might be shared with service providers who can then display advertisements to you and others about our products and services • Personal information can also be profiled to see how you use and interact with our website and online tools – improving the experience for everyone • Profiling your data also helps us and our partners to make sure you do not get new business advertising if you're already a customer – and keep things relevant • We may use your email and phone number to build a profile of the type of customers we wish to reach – and may share this information with social media and digital companies. Some examples are given later in this privacy notice
<p>There are legal reasons</p>	<ul style="list-style-type: none"> • We may need to use (process) your personal information to fulfil contractual obligations to prevent and detect criminal activity

	<ul style="list-style-type: none">• Corporate reporting may include personal information summaries, research and results• Anything we are required or permitted to do to meet our regulatory responsibilities; legal and good governance obligations.
--	--

3. What details do we collect – and how do we get them?

What data could we collect?	When do we collect this sort of information?
<p>Basic personal details</p> <ul style="list-style-type: none"> • Name • Date of birth • Gender • Marital status • Address and postcode • Email address • Phone number • Smoker status 	<ul style="list-style-type: none"> • When using our website • After enquiring about or purchasing a product or service – this includes where you start a website enquiry or quotation but don't submit it to us • We may also buy this sort of information from specially selected customer research companies or database owners, who may help us to clean up data records.
<p>Proof of identity</p> <ul style="list-style-type: none"> • Utility bill • Birth certificate • Photo ID • Or similar 	<ul style="list-style-type: none"> • When you are buying a product or service • Anytime that we need to establish your identity to prevent or check against fraud
<p>Financial information</p> <ul style="list-style-type: none"> • Income • Bank Details 	<ul style="list-style-type: none"> • When you are buying a product or service
<p>Information from your devices</p> <ul style="list-style-type: none"> • IP address - internet protocol details that identify your device • Cookies – these are small text files placed on your device when you visit a webpage • Our cookies policy is here: www.sunlife.co.uk/information-and-legal/cookies-policy/ 	<ul style="list-style-type: none"> • When using our website • After enquiring about or purchasing a product or service

<p>Preferences and interests</p> <ul style="list-style-type: none">• Your marketing preferences• Information you provide to use when entering prize draws, competitions or take part in customer research surveys	<ul style="list-style-type: none">• Enquiring about a product or service• During the purchase of a product or service
<p>Other</p> <ul style="list-style-type: none">• We may capture medical information that becomes apparent through an interaction• Any other information that you might give to us	<ul style="list-style-type: none">• For example, a request for a braille product pack• Any other information shared as part of interacting with us

4. Who might use your personal information?

Who might we share your personal information with?

Product providers

We sell financial products that are manufactured by different product providers. We will share your information with them to help set up and look after your policy.

Distribution partners

We sell financial products through distribution partners, such as intermediaries, aggregators, affiliates or funeral providers. We will share your information with them to enable them to contact you to support an enquiry, offer a new product or service or contact you when a payment has been missed.

Outsourced Service providers

We sell financial products through outsourced telephony service providers. We will share your information with them to enable them to take telephone calls on our behalf, contact you to support an enquiry or following your purchase, offer you a new product or service or contact you when a payment has been missed.

Social media platforms and online advertising providers

We may share some personal information with social media and online advertising providers so that they can match this to information about you which they already have themselves through your use of their services. We may share this information when you make a purchase from our website or purchase over the telephone through one of our outsourced service providers or distribution partners.

Sharing this information helps us to:

- Better understand the impact of our advertising campaigns and
- Advertise to you and other existing and potential customers who might be interested in the products and services we provide

Social media companies that provide services for us include Facebook, Instagram, WhatsApp, Google, YouTube and Twitter. If you do not want us to share your personal data with these companies for this purpose, you can tell us not to, by calling 0800 904 7678 to update your details or marketing preferences.

Facebook Pixel

The SunLife website also uses a Facebook Pixel, which is a software cookie which collects information about your activity on our website, if you have agreed to this by accepting Targeting cookies when you visit our website.

Visitors are assigned a Pixel ID, and the Facebook Pixel data may be used to connect visitor activity on our website (such as pages viewed and transactions made) to our Facebook advertising account and make a match to persons who are Facebook users.

Sharing this data helps us to better understand the impact of our advertising campaigns, and helps us make our advertising more relevant to our customers and other people who might be interested in the products and services we advertise and provide.

You can read more about this in our Cookie Policy [here](#).

Facebook Joint Data Controller Arrangements

Facebook requires us to notify visitors to our website that Facebook Ireland is a Joint Controller with SunLife for the processing of the data collected by the Pixel and transmitted to Facebook. Once Facebook receives this data it acts as an independent data controller. Information on how Facebook Ireland processes personal data collected by the Pixel, including the legal basis Facebook Ireland relies on and the ways to exercise Data Subject rights in relation to data processed by Facebook Ireland, can be found in Facebook Ireland's Data Policy at www.facebook.com/about/privacy.

SunLife and Facebook Ireland have entered into an arrangement to determine the respective responsibilities for compliance with the obligations under the GDPR with regard to the joint processing of personal data through the Pixel. SunLife is responsible for providing information on the processing of personal data through the Pixel and Facebook Ireland is responsible for enabling Data Subjects' rights with regard to the Personal Data processed by Facebook Ireland.

You can switch the Facebook Pixel off through the Privacy Preference Centre.

Marketing service providers

We work with other specialist companies who provide services, so we can help look after your policy and deliver a service to you. To do this, they need access to some of your personal information.

This may include customer service companies or IT firms that hold or analyse your information and carry out searches that help us trace you if we have lost touch, or companies who help us to understand user experience trends and behaviour.

We use data agencies who can provide us with information to better inform how best to contact you or build profiles of new audiences to contact based on our existing customer data, or use comparison sites, cashback sites, third party marketing service providers to contact you about products and services.

Customer research partners

We conduct customer research to understand what our customers think about the products and services we provide.

Sometimes we use third parties to undertake the research on our behalf. If you are contacted for research purposes, we will be clear about the purposes of the research, how any information you provide will be used, who will have access to it and how long it will be kept.

We will obtain your consent before we start the research.

Government industry bodies

In the future, we may be required by law to share your personal information with one of the following:

- Fraud prevention organisations
- Law enforcement bodies
- Courts and those involved in legal process

Anyone you ask us to share your information with

If you ask us to share your information – we will. For example, this might be sharing information with a trustee or a professional advisor.

Professional advisors

We use professional advisers to provide services to us, for example legal advice, accountancy services and consultancy services.

Anyone in the future who may buy or merge with our business

If we merge with another company (or if we are sold) then we will need to share your information with the other party.

5. How can I stay in control of my own data?

Your rights to accessing and correcting your personal information

Stop using my information or removing my consent

If you don't want us to use your information any more, you can ask us to stop and we will – unless there is an important reason why we need to continue using it.

You can ask us not to send you marketing messages by SMS text message, telephone, mail or email. And you can also ask us not to use your personal information as part of our customer profiling activity.

If you have given consent for us to use your personal information, then you have the right to withdraw your consent at any time. The SunLife Data Protection Officer will be able to explain to you the consequences of withdrawing your consent.

I want access to my personal data

You have the right to ask for a copy of the information we hold about you and this will usually be provided free of charge. For your security, we will take reasonable steps to confirm your identity before providing you with any data we may hold about you.

I need my information to be transferred

You can request that we transfer any personal information we hold about you to a specific company or person, or back to you directly. This will be sent electronically.

We use data agencies who can provide us with information to better inform how best to contact you or build profiles of new audiences to contact based on our existing customer data, or use comparison sites, cashback sites, third party marketing service providers to contact you about our products and services.

Please completely remove my information

In certain circumstances you can ask us to stop using or holding your information or ask us to restrict our use of the information.

If we can delete your information we will – but sometimes we must maintain records for legal reasons. If we cannot comply with your request, then we will contact you and explain why.

How long do we keep your information?

We will keep your information for as long as we have a relationship with you or where we have a legitimate interest to do so. Once our relationship with you has come to an end, we will retain your personal information for enough time that allows us to:

- Record your marketing preference and ensure you do not receive future marketing material where you have asked for this permission to be removed
- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under the law
- Deal with any complaints or legal claims regarding our products or services
- Send you marketing information in accordance with your marketing preferences and as outlined in the section above

If you require additional information on our data retention standards, please contact our Data Protection Officer using the details at the end of this notice.

If you are an existing customer

You may receive service-related communications for as long as you hold your policy.

You may also receive marketing messages about our other products and services until your policy ends, unless you have opted-out of receiving marketing messages.

If you have enquired about a product

We will only follow up on an enquiry for a maximum of two years (24 months).

If you have cancelled your policy

We will stop sending you marketing communications related to the product you held one year after you cancelled, unless you have opted-out of receiving marketing.

We will delete your personal information when it is no longer required for these purposes.

If you have opted out of receiving marketing messages

We will update our records and remove you from future marketing. You may still receive printed marketing up to 8 weeks after you have opted out depending upon the type of marketing materials. This is because printed marketing materials may be produced weeks in advance.

If you are on a 3rd party mailing database that we have access to, you may receive marketing communications related to products or services, unless you have opted out of receiving marketing messages from us.

Other questions you might have

How to update your information?

It is important that the information we hold about you is accurate and up to date. Please contact us if your information changes, or you believe the information we hold about you is incorrect. You can also update your contact details or marketing preferences. Please call us on 0800 904 7678 and we will be happy to help.

Where do we send your information?

We operate primarily in the United Kingdom. However, sometimes the information that we collect from you may be viewed from, transferred to, or stored, both inside and outside of the European Economic Area (EEA).

Your data is legally protected if it's used (processed) in the UK or the EEA. If your personal data is ever processed outside of the EEA, we will ensure that appropriate action is taken to keep everything safe. If you would like to know more, please get in touch with the SunLife Data Protection Officer, using the contact details below.

Not happy with something?

If you have any queries about this privacy notice or your personal information, you can get in touch with the SunLife Data Protection Officer and they can help you.

SunLife Data Protection Officer
1 Wythall Green Way, Wythall, Birmingham. B47 6WG
Email: DataProtection@sunlife.co.uk

You also have the right to complain to the Information Commissioner – which you can do by using the details below.

www.ico.org.uk/global/contact-us

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

This privacy notice was last updated January 2021.