

Your privacy and security is important to us

Our privacy policy explains how we use personal information we collect about you when you apply to become, or are, an employee.

Who we are

We are SunLife Limited, and are a distributor of financial products and services. This employee privacy policy explains how we use personal data we collect about you, when you apply to become, or are, an employee of the company.

SunLife Limited is part of The Phoenix Group. When you take a job with SunLife Limited you will be joining the Phoenix Group of companies and as such some of your personal information will be shared with them and (indirectly) their providers to administer some of your employee benefits. For detailed information on how they may use your data, you will need to refer to the Phoenix Group individual privacy policy. Please contact the Phoenix Group Data Privacy Officer. Contact details are provided at the end of this policy.

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Our obligation

At SunLife Limited we are committed to:

- Processing your personal information fairly and in accordance with applicable regulations
- Informing you about how we will use your personal information
- Only collecting information from you when we need it for legitimate purposes, or for legal reasons
- Ensuring that your personal information is adequate, relevant and not excessive for the purpose for which we collect it.
- Not keeping your personal information for longer than we need to
- Keeping your personal information secure, and limiting the people who can access it
- Ensuring that you know how to access your personal information and to exercise your legal rights including keeping your information accurate and up to date

- Ensuring any third parties we share your information with take appropriate steps to protect it

What information do we collect?

The personal information we collect about you will depend on the nature of the role you carry out for us and your personal circumstances and/or the role that you apply for. Whilst the list below is not exhaustive, it sets out examples of the types of information we collect from you or about you with respect to your employment:

Type of Information	Example	When do we collect this data
Basic personal details	Name, Address, Date of Birth	<ul style="list-style-type: none"> • During the recruitment process
Equal opportunities monitoring details	Ethnicity, Religion, Disabilities, Gender, Marital Status, Date of Birth	<ul style="list-style-type: none"> • During the recruitment process
Information to contact you at home or in an emergency	Home telephone number, Mobile number, Personal email address	<ul style="list-style-type: none"> • During the recruitment process, when joining the company and throughout employment
Information about your suitability to carry out your role and to work for Phoenix	CV, SunLife online application form, References, Interview notes, Right to work in the UK (passport, visa), Criminal record check, Credit check	<ul style="list-style-type: none"> • During the recruitment process
Information to enable us to pay you	Bank account information, National Insurance Number	<ul style="list-style-type: none"> • When joining the company and throughout employment
Information required to access buildings and systems	Image used for security pass, monitoring security access to SunLife premises	<ul style="list-style-type: none"> • When joining the company and throughout employment
Personal email	In the event of keeping in contact during sick absence (for example)	<ul style="list-style-type: none"> • When joining the company and throughout employment
internet usage	Ensuring compliance with internet use policy and to monitor potential data leaks	<ul style="list-style-type: none"> • When joining the company and throughout employment
Information about your terms of employment and information captured as part of your contract administration	Offer letter, contract of employment, sickness history, medical history, qualifications, annual leave information, bonus payment information, Promotion/ Transfer/ Secondment information, additional allowances	<ul style="list-style-type: none"> • When joining the company and throughout employment
Information relating to other people processes (performance management, capability, grievance, and disciplinary)	minutes from interviews and meetings, email correspondence	<ul style="list-style-type: none"> • Throughout your employment
Any other information	Information about beneficiaries and dependants in order to administer elements of your contract and benefits package.	<ul style="list-style-type: none"> • When joining the company and throughout your employment

Third Party Data Sharing eg. Criminal Record Checks	Pre-employment reference to ensure	<ul style="list-style-type: none"> • During the recruitment process
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Why do we collect and how do we use this information

Reason for collecting your data	Example of use
Recruitment	To assess your suitability to the role To conduct screening, assessments, and interviews To maintain communication during recruitment stage
Pre-employment vetting	To carry out criminal record checks, credit checks, previous employment reference checks (up to 6 years depending on the role)
To administer your contract of employment and general HR or business administration purposes	Payroll and ensuring HMRC tax legislation compliance Completing company induction Performance management and succession planning Business travel and expenses Flexible working arrangements Adhering to Health & Safety good practice Mandatory regulatory training Visa renewal applications Benefits administration Pension administration Provision of references
Security	To enable access to systems, telephones and buildings
To make SunLife a great place to work	Diversity monitoring, Equal Opportunities monitoring
Legal and Regulatory	Anything we are required or permitted to do to meet our regulatory responsibilities, Legal and good governance obligations, Obligations we have in relation to the prevention and detection of crime (including fraud)

Monitoring

Any information created, sent, received or stored on the network is the property of SunLife Limited. When you leave SunLife the contents of your mailbox become the property of SunLife. For the purposes of preventing any activity that may be illegal, unauthorised or harmful to SunLife, you, your colleagues, our customers or business partners at SunLife may, as permitted by law:

- Monitor all Internet traffic
- Record website visits, newsgroup and file transfers into and out of our network made by you
- Log details of the senders, recipients and contents of emails and instant messages

- Inspect any files stored on our network and if necessary to obtain files from an individual user's desktop, laptop or network storage areas without consultation or prior warning
- Monitor security access controls to SunLife premises
- Monitor other systems activity within the SunLife network

Legal basis for using your information

We will only collect, use and share your information where we have a valid reason to do so. We have 3 main reasons for using your information:

Contract – to fulfil our obligations to you under your employment contract. In order to perform that contract we need certain information from you (e.g. contact details and bank account details).

Legal obligation – we may need certain information from you in order to meet our legal obligations (e.g. our health and safety obligations to you, or our obligations to a third party (e.g. the taxation authorities))

To meet our legitimate interests in order to protect our business – (e.g. we will undertake checks to safeguard our business and our people against criminal activity). When we process personal information to meet our legitimate interests we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

Who do we share your information with?

Who do we share information with?	Why do we share it?
Third parties	We use third parties to administer payroll, benefits, pension, and IT services to enable us to manage email and messaging services and analyse information
The Phoenix Group of Companies	To enable Group-wide employee reporting
Anyone you ask us to	If you ask us to share your information, we will e.g. providing a reference to a prospective employer.
Regulatory, government and industry bodies e.g. HMRC, Fraud Prevention Organisations, Credit reference agencies, Law enforcement bodies	To comply with our legal and regulatory obligations
Those involved in a legal process including law enforcement authorities, courts, regulators, government authorities or other third parties	If a court requires us to disclose your information or if it needs to be disclosed as part of a legal process, or to enable us to meet a legal or regulatory obligation, or otherwise to protect our rights, or the rights of any third party.
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 may need to share your information with the other party depending on the nature of the transaction

Where do we send your information?

Sunlife Limited operates in the United Kingdom. However, sometimes the information that we collect from you may be viewed from, transferred to, or stored, outside the European Economic Area (EEA).

We ensure that we put in place appropriate safeguards when we allow your information to be processed outside the EEA. Please contact our People team if you would like more information on the appropriate safeguards we have in place.

What if you don't provide personal information?

We try not to ask you for personal information that we don't need. If you do not provide certain information you may not fulfil your contractual obligations and we may not be able to continue with your employment (e.g. if you don't provide evidence that you are entitled to work in the UK this will mean SunLife is non-compliant to UK Home Office legislation and we will not be able to employ you). We will try to make clear what information is essential and what information would help us but is not essential. If you don't want to provide certain information but are not sure of the impact that will have on our relationship with you as your employer please get in touch using the contact details at the end of this notice.

Your rights

Your rights are outlined below, but to keep things simple we have not included all the circumstances or conditions which apply to them. If you would like to exercise these rights please contact our HR team on the numbers at the end of this notice. If for any reason the right is limited or doesn't apply we will explain to you why this is the case.

Stop using my information

In certain circumstances you can ask us to stop using your information. If we can stop using your information we will, but sometimes we have to use your information for legal reasons. If we cannot comply with your request then we will contact you to explain why.

Access

You have the right to ask for a copy of the information that we hold about you in the form of a Subject Access Request. We only charge a fee in exceptional circumstances. For your security, we will take reasonable steps to confirm your identity before providing you with any personal information we may hold about you.

Transfers

In certain circumstances you can request that we transfer information we hold about you to you, or a third party in electronic form.

Remove my information

In certain circumstances you can ask us to delete or restrict the use of your information. If we can delete your information we will, but sometimes we have to maintain records for legal reasons. If we cannot comply with your request then we will contact you and explain why.

If we have shared the personal information in question with another company we will also let them know that you have asked us to stop using or retaining your information where it is reasonably practicable to do so.

How to update your information

It is important that the information we hold about you is accurate and up to date. Please let us know if your information changes, or the information we hold about you is incorrect. You are able to update your details on the HR system or by emailing people@SunLife.co.uk

If we have disclosed the personal information in question to another company (including another company within the Phoenix Group), we will also let them know about the changes unless it is impossible or difficult to do so.

How long do we keep your information?

We will not keep your information for longer that is necessary (as deemed by current data protection guidelines and/or regulatory requirements). Different information needs to be held for different periods of time. This may be due to a variety of reasons including legal obligations. If you require additional information on our data retention please contact our HR team using the details below.

We will keep your personal information for as long as you are employed by us. Once your period of employment has come to an end, we will retain your personal information for a period of time that enables us to:

- Meet our legal and regulatory obligations
- Defend an existing, or bring a potential, legal claim
- Comply with record retention required by law
- Administer pension

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

Changing this privacy notice

We may change this privacy notice from time to time to keep it up to date, or to comply with legal requirements. Any changes we make in the future will be posted on this page and we will notify you of any material changes.

1. Data Protection Officer contact details

If you have any questions or concerns about our use of your information or would like a copy of the information we hold about you, please write to:

Phoenix Data Protection Officer
1 Wythall Green Way
Wythall
Birmingham
B47 6WG

Telephone: +442035679233 Email: DataProtection@thephoenixgroup.com

HR contact details

For general queries regarding the use of your personal or sensitive information please contact the People Team using the following details:

email: people@SunLife.co.uk

2. Complaints

If you are unhappy with any aspect of the use of your data, please let us know using the HR Team details above. You have the right to complain to the Information Commissioner whose contact details are:

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.

<https://ico.org.uk/global/contact-us/>

Key Terms

"Sunlife" and **"you"** mean prospective, present, and past employees, contractors, and agency staff undertaking work for Sunlife Limited.

"personal information" means information about you, and from which you could be identified, including information which may be protected under the privacy or data protection laws of the country in which you are employed.

"sensitive information" means information that could be used in a discriminatory way and is likely to be of a private nature. This may include (but is not limited to) race, ethnic origin, religion, health information, and sexuality.

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