

# Privacy Policy

**Last updated: October 2019**

**Protecting your personal information is extremely important to us at Legal & General. It's especially important for a large financial company like ours, as our customers trust us to look after a huge amount of sensitive information on everything from their business affairs to their medical history.**

The way we collect, use, store and share your information is equally important. Our customers expect us to manage their information privately and securely. If we don't, they'll lose their trust in us.

This policy tells you how we collect and process your personal information. Please take a few minutes to read it, and show it to anyone else connected to your product or whose data you have shared with us. This policy may be subject to future change.

## **What does this policy cover?**

This privacy policy relates to retail customers who request financial advice, obtain quotes, purchase our products or enter into agreements with us, and individuals that we cover under employer sponsored schemes. We have a separate privacy policy for professional business clients, which can be found on our website [www.legalandgeneral.com/institutional/privacy-policy](http://www.legalandgeneral.com/institutional/privacy-policy)

## **What is personal information?**

When we talk about personal information we mean information about an individual that can identify them, like their name, address, e-mail address, telephone number and financial details. It can relate to customers (including prospective customers), their appointed representatives (e.g. powers of attorney), employees, shareholders, business contacts and suppliers. Any reference to "information" or "data" in this policy is a reference to personal information about a living individual.

## What information do we hold?

We may collect and process the following personal information about you:

Type of data	Description	Examples of how we use it
<b>Contact</b>	<ul style="list-style-type: none"> <li>• Who you are</li> <li>• Where you live (including previous addresses)</li> <li>• How to contact you</li> <li>• Third party contacts (e.g. family members or friends)</li> </ul>	<ul style="list-style-type: none"> <li>• Servicing your product</li> <li>• Pension tracing</li> <li>• Marketing</li> <li>• Analysis &amp; profiling</li> <li>• Enhancing our product and service offering</li> <li>• To provide financial advice</li> <li>• Product underwriting and pricing</li> </ul>
<b>Personal Details</b>	<ul style="list-style-type: none"> <li>• Age</li> <li>• Gender</li> <li>• Family details</li> <li>• Visual images &amp; personal appearance</li> <li>• Financial Details</li> <li>• Lifestyle and social circumstances</li> <li>• Health details</li> <li>• Employment Details</li> </ul>	<ul style="list-style-type: none"> <li>• Marketing</li> <li>• Analysis &amp; profiling</li> <li>• To provide financial advice</li> <li>• Product underwriting and pricing</li> <li>• Affordability checks (mortgages only)</li> <li>• Pension tracing</li> </ul>
<b>Transactional</b>	<ul style="list-style-type: none"> <li>• Bank and/or card details</li> <li>• How you use your product</li> <li>• Changes you make to your product or account</li> </ul>	<ul style="list-style-type: none"> <li>• Servicing your product</li> <li>• To provide financial advice</li> <li>• Making sure our products and services are fit for purpose</li> </ul>
<b>Contractual</b>	<ul style="list-style-type: none"> <li>• Your claims history</li> <li>• Your creditworthiness</li> </ul>	<ul style="list-style-type: none"> <li>• To provide financial advice</li> <li>• Product underwriting and pricing</li> <li>• Making sure the product is right for you</li> <li>• Affordability checks (mortgages only)</li> </ul>
<b>Consent &amp; preferences</b>	<ul style="list-style-type: none"> <li>• Ways you want us to market to you</li> <li>• To obtain information from third parties on your behalf</li> </ul>	<ul style="list-style-type: none"> <li>• Marketing</li> <li>• Pension tracing</li> </ul>
<b>Technical</b>	<ul style="list-style-type: none"> <li>• Details on the devices and technology you use</li> </ul>	<ul style="list-style-type: none"> <li>• Making sure our products and services are fit for purpose</li> </ul>
<b>Open data &amp; public records</b>	<ul style="list-style-type: none"> <li>• Electoral register</li> <li>• Land register</li> <li>• Other information about you that is openly available on the internet</li> </ul>	<ul style="list-style-type: none"> <li>• To provide financial advice</li> <li>• Product &amp; Service administration</li> </ul>
<b>Documentary data &amp; national identifiers</b>	<ul style="list-style-type: none"> <li>• Details about you that are stored in documents like: <ul style="list-style-type: none"> <li>• Your passport</li> <li>• Drivers licence</li> <li>• Birth certificate</li> <li>• National Insurance number</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Identification and verification</li> <li>• Prevent financial crime</li> </ul>

## Where do we get our information from?

- **Directly from you – information you provide when you fill in forms or contact us by phone, email, etc.**

We may record phone calls for our mutual protection and to improve our customer service standards.

- **Information we collect about you or receive from other sources.** This could be information you provide to us electronically (through our website or an online portal, for example), information we get from your online browsing activity, information from a third party (e.g. pension providers) or from publicly available sources such as social media platforms or the electoral register (e.g. to detect fraudulent claims). We may also receive information if you have been dealing with a financial adviser or broker, or have been introduced to us by another company (e.g. a bank, insurer, building society, your employer or their financial adviser). Please refer to our cookie policy for more information on how we use cookies  
[www.legalandgeneral.com/privacy-policy/cookies](http://www.legalandgeneral.com/privacy-policy/cookies)

## How do we use your information?

We use personal information that we hold about you:

- To carry out our responsibilities resulting from any agreements you've entered into with us (e.g. to provide financial advice, underwrite and administer your product, including processing claims and mortgage affordability checks) and to provide you with the information, products and services that you've asked from us (e.g. quotes and pension tracing).
- To provide you with marketing information about services and products we offer across the Legal & General group which may be of interest to you. If you have opted in to receive marketing from us, based on your marketing preferences we may deliver this information by post, telephone, e-mail, SMS or personalised online marketing via our own systems such as My Account, social media platforms and/or other third party websites e.g. YouTube. Please note that if you choose not to receive online marketing, you will not see personalised messages using your personal data, however you may still see generic online advertising about our products and services. We will not sell your data to third parties for them to market to you. We may also send marketing to you using our "legitimate interests", please see below for further information.
- To tell you about changes to our services and products.
- To comply with any applicable legal or regulatory requirements (including "know your customer" checks, or to comply with any applicable regulatory reporting or disclosure requirements).
- For carrying out market research, statistical analysis and customer profiling to help us to improve our processes, products and services and generate new business (e.g. to understand digital behaviours, identify financial

attitudes and develop more engaging communications).

- To define our actuarial, pricing and underwriting strategies.
- To run our business in an efficient and proper way. This includes testing our systems, managing our financial position, business capability, planning, communications, corporate governance, and audit.
- For any other purpose that we've agreed with you from time to time.

When you apply for a product or to receive a service from us, the application form you fill out or the resulting contract may contain additional conditions relating to the way we use and process your personal information. These will apply in addition to the uses described in this document.

In some cases, we may use software or systems to make automated decisions (including profiling) based on the personal information we have, or collect from others. These may include:

- **The prevention and detection of fraud and financial crime**

To perform transaction monitoring, identity verification, money laundering and sanctions checks, and to identify politically exposed individuals. We are required by law to perform these activities which may be achieved using solely automated means to make decisions about you. We may use these activities to decline the services you have requested or to stop providing existing services to you.

- **Providing quotes, calculating premiums and underwriting decisions**

We may assess a number of factors including information about you and your health, lifestyle information such as your postcode, occupation and hazardous pursuits that you perform. These factors will be assessed against our pricing and underwriting criteria which may include statistics regarding life expectancy, illness, injury and demographic risks. For general insurance the factors may include your claims history, where you live, and the value of items you wish to insure. We may use these activities to determine the price of your product and whether we should undertake the risk of insuring you - including how much insurance should be granted to you, how much you should pay for it and whether or not to insure you in the first place.

For mortgage purposes the factors may include your creditworthiness, assessment of mortgage affordability, property value and checks against records held by credit referencing and fraud prevention agencies.

- **The provision of financial advice and recommendations**

We may perform computer-based assessments with your personal and financial information in order to produce your financial advice recommendations. These activities are not solely based on automated processing and our qualified financial advisers will always validate the outcome to ensure that the decisions are suitable based on the information that you have provided.

- **The identification of customer vulnerabilities**

We may use speech analytics on recorded phone calls to help us identify vulnerable customers. These profiling activities are not solely based on automated processing. The results are manually reviewed to decide if we need to take further action to ensure the fair treatment of customers with identified vulnerabilities.

- **Servicing activities** such as (i) Personalising the content and design of communications and online services (such as My Account) and (ii) Determining when to provide tailored communications about your Legal & General product (e.g. as a result of changes in your personal circumstances or lifestyle) and the appropriate channel(s) to use

These may be achieved using profiling in order to predict certain characteristics about you (e.g. your economic situation, interests, personal preferences or transactional behaviour). The activities will not have a detrimental effect on you.

### Using your information in accordance with data protection laws

Data protection laws require us to meet certain conditions before we're allowed to use your personal information in the way we describe in this privacy policy. We take these responsibilities extremely seriously. To use your personal information, we'll rely on the following conditions, depending on the activities we're carrying out:

- **Providing our contracts & services to you:** We'll process your personal information to carry out our responsibilities resulting from any agreements you've entered into with us and to provide you with the information, products and services you've asked from us, which may include online services.
- **Complying with applicable laws:** We may process your personal information to comply with any legal obligation we're subject to.
- **Legitimate interests:** To use your personal data for any other purpose described in this privacy policy, we'll rely on a condition known as "legitimate interests". It's in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. We may use your information to:
  - Carry out market research and product development, which can include creating customer demographics and/or profiling.

- Continue to send marketing information, via post only, to customers who purchased a product before 25th May 2018 and did not opt-out, until such time as they have reviewed their marketing preferences (which can be done at any time).
- Send marketing information, via post only, to customers who have a relevant and appropriate relationship with Legal & General.
- Develop and test the effectiveness of marketing activities.
- Develop, test and manage our brands, products and services.
- Study and also manage how our customers use products and services from us and our business partners, including customer surveys.
- Manage risk for us and our customers.

This requires us to carry out an assessment of our interests in using your personal data against the interests you have as a citizen and the rights you have under data protection laws.

The outcome of this assessment will determine whether we can use your personal data in the ways described in this privacy policy (except in relation to marketing, where we'll always rely on your consent). We'll always act reasonably and give full and proper consideration to your interests in carrying out this assessment.

- **Consent:** We may provide you with marketing information about our services or products where you've provided your consent for us to do so.

You may opt out of marketing at any time by e-mailing or telephoning your customer servicing team. Alternatively, you can also use the Contact Us section of our website [www.legalandgeneral.com/existing-customers/contact-us](http://www.legalandgeneral.com/existing-customers/contact-us). You can also manage your marketing preferences on our customer self-service systems, My Account.

Where you have consented, we will contact third parties (e.g. pension providers) to obtain information on your behalf.

- **Special category (sensitive) data:** Where you have consented, we will process any medical & health, racial & ethnic origin, genetic & biometric or sex life & sexual orientation information you have provided, and any other sensitive information obtained from a third party (e.g. your GP or other medical professional), solely for the purposes of allowing us to underwrite and administer your product, provide other services (e.g. financial advice) and deal with claims.

Alternatively, we may process special category data for reasons of substantial public interest in accordance with applicable law. We will only process data that is needed for specific purposes.

- **Criminal Conviction Data:** Where you have consented, we will process this type of information solely for the purposes of allowing us to underwrite and administer your product and deal with claims.

Please be aware that the personal information you provide to us, and which we collect about you, is required for us to be able to provide our services to you and without it we may not be able to do so.

### How long do we keep your information for?

We'll keep your personal information in accordance with our internal retention policies. We'll determine the length of time we keep it for based on the minimum retention periods required by law or regulation. We'll only keep your personal information after this period if there's a legitimate and provable business reason to do so.

For pension products, we may retain your personal information indefinitely using the legitimate interests condition in order to support future enquires from you, your family or financial adviser and our regulators.

For certain research and statistical activities, we may indefinitely retain minimised personal information about you, including medical information, to solely to define our actuarial, underwriting and pricing risk strategies. These activities will not be used to make a decision, or take measures, against you.

### Who do we share your personal information with?

We'll only disclose your information to:

- Other companies within the Legal & General Group, third-party suppliers, contractors and service providers for the purposes listed under "How do we use your information" above.
- Selected third parties, so that they can contact you with details of the services that they provide, where you have expressly opted-in or consented to the disclosure of your personal data for these purposes.
- Our regulators, government agencies (e.g. HMRC), law enforcement agencies, credit reference agencies, fraud prevention agencies, reassurers, as well as our professional advisers etc. You can find an up to date list of reassurers on our website [www.legalandgeneral.com/privacy-policy/consent-controllers](http://www.legalandgeneral.com/privacy-policy/consent-controllers)

Additionally, we may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we'll disclose your personal data to the prospective seller or buyer of such business or assets.
- If we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If you have been dealing with a financial adviser, we'll provide information about your product and, where appropriate, with other information about your dealings with us, to enable the adviser to give you informed advice.
- For employer sponsored schemes, we may share

some details of your plan with your employer and any professional advisor(s) they appoint on their or your behalf to service and provide accurate financial advice about the scheme.

- In order to enforce or apply the terms of any contract with you.
- If we're under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.
- To protect you and Legal & General from financial crime, Legal & General may be required to verify the identity of new and sometimes existing customers. This may be achieved by using credit reference agencies to search sources of information relating to you (an identity search). This will not affect your credit rating. If this fails, Legal & General may need to approach you to obtain documentary evidence of identity.
- If you make a claim, we'll share your information (where necessary) with other insurance companies to prevent fraudulent claims.
- Legal & General Surveying Services may use a third party surveyor to carry out the survey or valuation of the property.

Additionally, your information, including special category and criminal conviction data, may be disclosed to our reinsurer and to any other insurance company to whom you apply for products or services.

If you've been introduced to us by another company (e.g. bank, insurer, building society, your employer or their financial adviser), we may share your information with them to enable them to:

- Administer and service your product.
- Carry out market research, statistical analysis and customer profiling.
- Where you have consented, send you marketing information by post, telephone, e-mail and SMS about their products and those of carefully selected third parties.
- Assist you with your application process (aggregator and price comparison websites only).

### Credit Reference Agencies (mortgage customers)

In order to process your mortgage application, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.

A hard footprint will be left on your credit file, which may affect your credit score when an application has been submitted. This may or may not affect your ability to obtain credit from other providers.



Legal & General will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at:

- Call Credit - [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain)
- Equifax - [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)
- Experian - [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

### **Fraud prevention**

The personal information Legal & General collects from you may be shared with fraud prevention agencies who will use it to prevent fraud and money laundering and to verify your identity.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We may also share information about you with other organisations and public bodies, including the police and we may check and/or file your details with fraud prevention agencies and databases.

If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies can be found by accessing this link, [www.cifas.org.uk/fpn](http://www.cifas.org.uk/fpn)

Legal & General and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities.
- Managing credit and credit related accounts or facilities.
- Recovering debt.
- Checking details on proposals and claims for all types of insurance.
- Checking details of job applicants and employees.
- Checking sources of income and tax details.

Legal & General and other organisations may access and use from other countries the information recorded by fraud prevention agencies. Please contact our Group Financial Crime department if you wish to receive the relevant details of the fraud prevention agencies:

Address:

Group Financial Crime, 7th Floor, Brunel House, 2 Fitzalan Road, Cardiff CF24 0EB

Legal & General may also check the details of other parties related to your contract, including verification of identity. This includes beneficiaries, trustees, settlors, third party premium payers, executors or administrators of your estate, parties with power of attorney and any other beneficial owner.

### **General insurance only: claims history**

Under the conditions of your product you must tell us about any insurance-related incidents, whether or not they give rise to a claim. When you tell us about an incident we'll pass information relating to it to a database.

We may search these databases when you apply for insurance, in the event of any incident or claim or at a time of renewal, to validate your claims history or that of any other person or property likely to be involved in the product or claim.

### **Protecting your data outside the UK**

The data that we collect from you may be transferred to, and stored at, a destination outside the UK to third-party suppliers, delegates or agents. We'll take all reasonably necessary steps to make sure that your data is treated securely and in accordance with this privacy policy, to ensure your personal information is handled with the same protections that we apply ourselves .

We'll only transfer your data to a recipient outside the UK where we're permitted to do so by law (for instance, (A) where the transfer is based on standard data protection clauses adopted or approved by the UK's Information Commissioner's Office, (B) where the transfer is to a territory that is deemed 'adequate' by the UK, or (C) where the recipient is subject to an approved certification mechanism and the personal information is subject to appropriate safeguards, etc.).

Unfortunately, sending information via e-mail is not completely secure; anything you send is done so at your own risk. Once received, we will secure your information in accordance with our security procedures and controls.

### **Your rights**

You have rights under data protection law that relate to the way we process your personal data. More information on these rights can be found on the Information Commissioner's website. If you wish to exercise any of these rights, please get in touch with your customer services team. Alternatively, you can also use the Contact Us section of our website [www.legalandgeneral.com/existing-customers/contact-us](http://www.legalandgeneral.com/existing-customers/contact-us)

## Your rights

1. The right to access the personal data that we hold about you.
2. The right to make us correct any inaccurate personal data we hold about you.
3. The right to make us erase any personal data we hold about you. This right will only apply where for example:
  - We no longer need to use the personal data to achieve the purpose we collected it for
  - You withdraw your consent if we're using your personal data based on that consent
  - Where you object to the way we use your data, and there is no overriding legitimate interest.
4. The right to restrict our processing of the personal data we hold about you. This right will only apply where for example:
  - You dispute the accuracy of the personal data we hold
  - You would like your data erased, but we require to hold it in order to stop its processing
  - You have the right to require us to erase the personal data but would prefer that our processing is restricted instead
  - Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
5. The right to object to our processing of personal data we hold about you (including for the purposes of sending marketing materials to you).
6. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format.

You also have the right to make us transfer this personal data to another organisation.
7. The right to withdraw your consent, where we're relying on it to use your personal data (for example, to provide you with marketing information about our services or products).
8. For automated decisions (including profiling), you have right to:
  - Obtain an explanation of the decision and challenge it
  - Request for the decision to be reviewed by a human being.

## Contacts and complaints

If you have any questions about this privacy policy or wish to exercise any of your rights, including changing your marketing preferences, please get in touch with your usual Legal & General contact or your customer services team. Alternatively, you can also use the Contact Us section of our website [www.legalandgeneral.com/existing-customers/contact-us](http://www.legalandgeneral.com/existing-customers/contact-us)

If you have any concerns about the way we process your personal data, or are not happy with the way we've handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

**First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF**

### Data Protection Officer

Legal & General has appointed a Data Protection Officer to provide independent expert advice and monitor compliance with data protection laws:

Name: **Liz Gaspar**

E-mail address: **Data.Protection@landg.com**

Address: **1 Coleman Street, London, EC2R 5AA**

**Legal & General Financial Advice Limited** is a wholly owned subsidiary of Legal & General Group plc. Registered in England and Wales number 11901252. **Registered office:** One Coleman Street, London EC2R 5AA. Legal & General Financial Advice Limited is authorised and regulated by the Financial Conduct Authority.

Q0059257/195098/Mar/2020

