

Data Protection Notice (DPN) for Professional Advisers

It is acknowledged by the Canada Life (The Company) and the Professional Adviser/Intermediary (the Adviser) that each party has independent purposes and means for processing the Personal Data and that accordingly each party acts as an independent Controller in relation to its own respective processing. It is further acknowledged by the parties that in relation to the Personal Data the parties are not joint Controllers and neither party is a Processor on behalf of the other.

The information collected shall be processed in accordance with the Data Protection Act 2018 (the Act) and any successor legislation. All reference to **Personal Data**, **Special categories of personal data**, **Data Subjects** and **Processing** shall have the meaning as set out in the Act.

The Company requires access to the Personal Data for processing for the following lawful purposes and the sharing of the Personal Data is necessary for such purposes:

- for the performance of a contract to which the Data Subject is a party or in order to take steps at the request of the Data Subject prior to entering into a contract relating to the Business;
- the Data Subject has given consent or explicit consent (as required) to the processing respectively of his or her Personal Data or Special Categories of Personal Data for one or more specific purpose;
- processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party;
- processing may be conducted to conform to statutory laws or regulatory directives, the administration of justice, or it is in the substantive public interest, including, but not limited to, prevention of fraud, or to comply with anti-money laundering regulations; and/or
- processing is necessary in order to protect the vital interests of the Data Subject.

The Intermediary shall be responsible for ensuring that, in accordance with the Act, it has provided all necessary fair processing information, including, but not limited to, the Company's DPN, to all relevant Data Subjects and has taken appropriate steps to legitimise the sharing of the Personal Data to enable the Company to process the Personal Data for purposes compatible with the lawful purposes listed above.

The Intermediary shall not process Personal Data in a way that is incompatible with the lawful purposes listed above.

For the lawful purposes as listed above the following types/categories of Personal Data may be shared between the parties:

- name;
- address and postcode;
- gender;
- date of birth;
- place of birth;
- national insurance number;
- marital status;
- contact details;
- policy number;
- medical information;
- lifestyle information;
- financial information;
- tax identification number;
- employer details;
- job title and salary information; and
- details of spouses, second annuitants, dependants, lives assured and beneficiaries.

The Intermediary shall ensure that the Personal Data shared must not be irrelevant or excessive with regard to the lawful purposes.

Each party shall ensure that it processes the Relevant Personal Data fairly and lawfully in accordance with both the Act and any specific directions of a supervisory authority.

Each party shall deal promptly and in good faith with all reasonable and relevant enquiries from the other party relating to its processing of Personal Data under these Terms.

Each party shall, if it receives any complaint, notice or communication from a supervisory authority which relates to the other party's processing of Personal Data under these Terms or a potential failure to comply with the Act, promptly (and in any event within 3 (three) business days) forward such complaint, notice or communication to the other party and provide the other party with reasonable cooperation and assistance in relation to the same.

The parties agree that the responsibility for complying with any Data Subject request (in relation to any rights of Data Subjects or otherwise) falls to the party receiving the Data Subject request in respect of the Personal Data held by that party. The parties agree to provide reasonable and prompt assistance (and in any event within 3 (three) business days of a request for assistance from the other party) to enable the other party to comply with any Data Subject requests and to respond to any other queries or complaints from Data Subjects.

The parties agree to implement appropriate technical and organisational measures to protect the Personal Data in their possession against unauthorised or unlawful processing and against accidental loss, destruction, damage, alteration or disclosure in accordance with the Act.

Personal information collected via Intermediaries including quotation requests and application forms will be shared within the Canada Life group of companies to provide Intermediaries with product information which may be relevant for their client's needs and requirements.

This section refers to our privacy policy in relation to our Home Finance KFI & application portal.

The KFI & application portal is a dedicated website with secure entry for use by the Intermediary who has been directly authorised to have access. This access is agreed by Canada Life as part of our Intermediary registration process. Our KFI & application portal is an online tool for the use of producing client illustrations.

Using the Home Finance KFI & application portal

– this section of the Privacy Notice only applies to Intermediaries, financial advisers, paraplanners or administrators of Financial Services companies.

KFI & application portal tool

You will be asked to log in using your username (your registered email address) and password. If this is your first time logging in, you will need to use the password emailed to you by Canada Life. If you have used the KFI & application portal before, you will have changed your password to something more memorable.

Home Finance KFI & application portal – Email addresses

We require this information to provide you with a better service, and in particular for the following reasons:

- We may periodically send promotional emails about new products, special offers or other information that we think you may find interesting, using the email address which you have provided. We may use the information we collect to verify your identity or for analytical purposes, and to assist us in improving our processes, products and services.
- We will use your email address to send you automated emails at relevant stages of your application.

Home Finance KFI & application portal – Passwords

In order to provide you with maximum protection, we ask you to choose a password to access these tools. Your password is unique to you and helps us to protect your client's personal information. You must keep this password safe and must not disclose it to anyone.

You will need your password to be able to produce illustrations for your clients. If you have forgotten your password or are worried someone else may know your password, please click the 'Forgotten password?' link under the password box on the homepage of both tools to reset your password.

Home Finance KFI & application portal – Restricted access

This tool is only available to Advisers who are registered with Canada Life.

If you would like to register, please visit our KFI & application portal page at <https://www.canadalife.co.uk/login/home-finance-kfi-application-portal/> or email - hf-support@canadalife.co.uk

Before using this tool, please make yourself familiar with our products. Our sales support team can provide a demo of the system.

If you have any queries while using the KFI & application portal, please contact our Adviser Support Team on 0800 068 0212.

Our KFI & application portal is a secure site that uses 256-bit Secure Sockets Layer (SSL) security, subject to your web browser limitations, to encrypt data in transit between your browser and the server.

Home Finance KFI & application portal - Client data

Client data entered by Advisers onto our KFI & application portal will only be accessible to the Adviser, nominated administrators at the firm, and Canada Life, and is only used for the purpose of providing quotations and in accordance with this Privacy policy and Terms & Conditions. Client data will not be used for direct marketing purposes.

We may however disclose and /or use any information or data you give us for the purpose of crime prevention, conducting market research, preparing strategic or other marketing plans or gauging product sales or product performance. We may also exchange the information with associated companies, service providers or agents with which we have a contractual relationship, or to any party in connection with the approved uses of such information set out above.

DPN - Home Finance Workshops

We take collection and management of personal data very seriously. This DPN explains how the information provided to Canada Life at our Workshops will be treated and how it will be used.

How the information will be used

The information collected shall be processed in accordance with the Act and any successor legislation. The information provided to us may be used:

- To contact you with relevant information based on the interests you indicate in the feedback form
- To contact you in response to any enquiries and requests we may receive
- To include in Canada Life marketing material or press communications any comments or feedback you provide in relation to your attendance at the workshop
- For research and statistical analysis for future workshop planning
- To identify further support needs for Advisers

Data will be held securely and not held for longer than is necessary and in accordance with FCA record keeping guidelines. Marketing activity on a business to business basis is based on Article 6.1 of the GDPR in that processing is necessary for the purposes of the legitimate interests by the controller, in that there is reasonable expectation that Canada Life will contact you for the purpose of communicating product, service, event, training, education programme, industry and regulatory information.

If personal information is submitted about another person, then you confirm that they have consented to providing their information to Canada Life and for the information to be used and shared as set out in this notice.

The **Act** provides individuals (**Data Subjects**) with various rights including the right to be told what **Personal Data** is held by **Canada Life** and the right to request that any inaccuracies in respect of their **Personal Data** are corrected.

Further Information

Should there be any queries regarding Personal Data or individuals rights under the Act, please contact **Canada Life's Data Protection Officer** in writing at:

Canada Life Limited, Canada Life Place, Potters Bar, Hertfordshire, EN6 5BA or by email at:
dpo@canadalife.co.uk

Our comprehensive version of our Customer Data Protection Notice is available at:

<https://www.canadalife.co.uk/data-protection-notice>

