



# Canada Life

## Data Protection Notice

### Company Website

Canada Life Limited, Canada Life International Limited, CLI Institutional Limited, Canada Life International Assurance (Ireland) DAC, Stonehaven UK Limited and MGM Advantage Life limited (referred to as 'Canada Life', 'we', 'us' or 'our' in this Data Protection Notice (DPN)) takes its privacy obligations very seriously. Any personal information provided to us, as data controller, by a policyholder, joint policyholder, employer policyholder, trustee, insured person, professional adviser, beneficiary, claimant or member (referred to as 'you' or 'your' in this DPN), will be treated in accordance with the Data Protection Act 2018 (DPA) in line with the General Data Protection Regulation (GDPR).

#### Using personal information

We use your personal information to undertake activities relating to the setting up, administration and renewal of our Investment, Pension, Life and Equity Release policies, products and services. This includes processing applications and handling any claims. For the majority of our business we will rely on the performance of our contractual arrangements with you as the legal basis for processing.

We do not use policyholder, member or beneficiary personal data for marketing purposes and we do not make your information available to third parties for the purpose of direct marketing. For business to business marketing purposes, we do use personal information of institutional investors, professional investors and advisers.

We use underwriting software to process some applications and quotations which will use an element of automated decision making, for example credit referencing.

Exceptionally, we may rely on our legitimate interests to process your personal data. When we do, we will demonstrate compelling legitimate grounds for doing so.

For employer-related group insurance products, the DPA permits appropriate information about employees to be provided by an employer to an insurer without individual consent (including details of long-term absentees, current and previous claimants, and medical underwriting decisions). The DPA permits that members may individually withdraw their consent. In those instances Canada Life will be unable to provide cover for that individual.

When medically underwriting or assessing a claim we will use the information provided by you and obtain consent if we require information from medical professionals.

#### Sharing personal information

We share personal information only on the basis of the purposes for which it was collected. This notice is intended to illustrate the instances where data may be shared:

- with other Canada Life group companies including those outside the European Economic Area (EEA);
- personal information collected via professional advisers including quotation requests and application forms will be shared within the Canada Life group of companies to provide professional advisers with product information which may be relevant for their client's needs and requirements;
- with any of our service providers including, funding providers, solicitors, reinsurers and / or regulators;
- with other insurers and government agencies, including without limitation Her Majesty's Revenue and Customs (HMRC), Department of Work and Pensions (DWP), the Isle of Man Income Tax Division and the Revenue Commissioners;
- in order to prevent, detect or investigate financial crime including fraud or other criminal activity, we may share your data with other companies (including private investigators), organisations (including fraud prevention agencies and databases), public bodies (including the police) and associations and credit reference agencies;
- we may use electronic searches, including credit reference agencies which record any credit searches on your file;

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- we will not share your medical information with anyone other than yourself without your consent except as described in the next bullet point. This includes your employer, spouse, other relatives, friends or your legal or professional adviser. In some circumstances, it may be appropriate to advise your employer about your medical information, for example, to recommend alternative supportive therapy. However, we will seek your consent in such circumstances;
- for employer-related products and services only, some medical information related to underwriting decisions and non-medical information about you necessary for lawful policy and claim administration purposes will be shared with your employer;
- we will not share non-medical information concerning you with your spouse, other relatives, friends or your legal or professional adviser unless you provide your consent to us in writing;
- for insurance related products, with your own doctor or relevant medical professionals; and/or
- in any circumstances if permitted or required to do so by law or if we have your consent to do so.

**International Transfers**

Given the global nature of our business, we use third party suppliers and outsourced services (including cloud-based services), which can require transfers of personal information outside of the EEA. In doing so, we ensure there are contractual arrangements in place with those organisations who have organisational and technical measures to protect your personal information.

We do use third party suppliers and outsourced services (including cloud-based services), which could necessitate transfers of personal data outside of the EEA. In doing so, we will ensure there are contractual arrangements in place with those organisations who have appropriate organisational and technical measures to protect your personal information.

We will only transfer data outside of the EEA with an appropriate legal basis. Although this list may change from time to time, we may transfer personal data to the following countries outside of the EEA:

- Canada
- Hong Kong (branch)

In relation to our annuity book, communication with annuitants will necessitate correspondence in any global country (depending upon the annuitants location) for the purposes of our activities.

In relation to any claims commenced whilst abroad, communication with medical professionals, authorities, tax offices, embassy staff and surveillance will necessitate correspondence in any global country (depending on the location of the claimant) for the purposes of our activities.

**Retention of your personal data**

We will keep your personal data only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either you or we may wish to bring a legal claim, or where we are required to keep your personal data due to legal or regulatory reasons.

Each Canada Life department has a departmental 'Records Retention and Disposal Guide' (RRDG), which defines the length of time that records processed by that department are retained before deletion.

**Fraud prevention and detection**

In order to prevent and detect fraud it may be necessary to:

- Share information about you with other organisations (including private investigators) and public bodies (including the Police).
- Check and / or file your details with fraud prevention agencies and databases.
- 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 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.
- We and other organisations may access and use information recorded by fraud prevention agencies from other countries.

**Employer-related products (Group Insurance)**

Group Insurance products are policies taken out by an employer to provide cover for its employees. We need certain data to enable us to administer these insurance policies.

Canada Life requests basic personal information to be provided by an employer for the administration of a Group Insurance policy. In addition, for pricing purposes, we will also require details of long-term absentees, current and previous claimants, and medical underwriting decisions.

Canada Life will not use this data to market directly to individuals or pass this data to other parts of our company in order to market directly to individuals.

The DPA permits appropriate information about employees to be provided by an employer to an insurer without individual consent. This includes details of long-term absentees, current and previous claimants, and medical underwriting decisions.

The Act allows an individual to specifically withdraw their consent for this transfer of data. If an individual does withdraw their consent, Canada Life will not be able to provide cover for that individual.

There are circumstances where we will require more information from you, such as medical details to assess a claim or underwrite a particular benefit. In these circumstances, we will ask for your explicit consent to process this data.

We use an underwriting engine to process some applications and quotations which will use an element of automated decision making. This does not apply to claims assessment or to medical underwriting.

**Medical Information in employer-related products and services**

- Canada Life will not share your medical information with anyone other than yourself without your consent. This includes your employer, spouse, other relatives, friends or your legal advisor. In some circumstances, it may be appropriate to advise your employer about your medical information, for example, to recommend alternative supportive therapy. However, Canada Life will obtain your consent in such circumstances.

**Non-Medical information in employer-related products and services**

- Canada Life will not share non-medical information concerning you with your spouse, other relatives, friends or your legal advisor unless you provide your consent to us in writing. Non-medical information about you will be shared with your employer only for lawful policy and claim administration purposes.

**Appointed Representatives**

- We recognise that we will need to communicate with appointed legal representatives and / or attorneys where the contractual formalities permit third parties to act in your interests.

**Insurance related**

- Canada Life will share your data with your own doctor or relevant medical professionals for insurance related products.

**Actuarial pricing and mortality**

The nature of our business is to provide investments, life and pensions cover, critical illness, income protection and employer-related group products. To do this we need to use the personal information provided to carry out analysis of actuarial risks (risks of gains or losses), mortality and morbidity risks and pricing. This will be carried out in accordance with the Institute & Faculty of Actuaries' data handling protocols.

**Online data capture**

Communicating, interacting or applying to us online: we may gather location data and online identifiers which may identify you, such as your internet protocol (IP) address (the unique personal address which identifies your device on the internet) and mobile device IDs.

**Our legal grounds for using your information**

Legal Ground	Details
Performance of our contract with you or an employer	<p>For the majority of our activities, we will rely on the performance of our contractual arrangements with you.</p> <p>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract.</p>
Compliance with a legal obligation	<p>Processing is necessary for compliance with a legal obligation to which we are subject.</p>
In the public interest	<p>Processing is necessary for the performance of a task carried out in the public interest.</p>
For our legitimate business interests	<p>Exceptionally, we may rely on our legitimate interests to process your personal data. When we do so, we will demonstrate compelling legitimate grounds for doing so.</p> <p>This includes sending professional investors, advisers and institutional investors' information about relevant products and events where processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where you are a child.</p>
Your explicit consent (optional)	<p>You have given your explicit consent to the processing of those personal data for one or more specified purposes.</p> <p>You are free to withdraw your consent, by contacting our Data Protection Officer.</p>
Your explicit consent (necessary)	<p>You have given your explicit consent to the processing of those personal data for one or more specified purposes, where we are unable to procure, provide or administer insurance cover without this consent.</p> <p>You are free to withdraw your consent by contacting our Data Protection Officer. However withdrawal of this consent will impact our ability to provide insurance or pay claims.</p>
For health services	<p>Processing is necessary for the purposes of preventive or occupational medicine, for medical diagnosis, the provision of health or social care or treatment on the basis of EU or UK law or pursuant to contract with a health professional of who is under legal or professional obligations of secrecy.</p>

- We will only share your data in any circumstances where we are permitted or required to do so by law or if Canada Life has your consent to do so.

**YOUR RIGHTS AND CONTACT DETAILS OF THE  
INFORMATION COMMISSIONER'S OFFICE (ICO)**

You may have the right to require us to:

- provide you with further details on the use we make of your personal information or your special categories of data;
- provide you with a copy of the personal information that you have provided to us or which we hold;
- update any inaccuracies in the personal information we hold;
- delete any special category of data or personal information for which we no longer have lawful grounds to use;
- cease processing of your personal information that is based on consent, by withdrawing your consent to that particular processing;
- cease any processing based on legitimate interests grounds, unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- restrict how we use your personal information whilst a complaint is being investigated.

In certain circumstances, we may need to restrict the rights listed above in order to safeguard the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of our legal responsibilities) and for the performance of our contract with an employer who is the policyholder for employer-related products and services.

We reserve the right to amend or modify this DPN at any time and in response to any changes in applicable Data Protection and privacy legislation.

If we decide to change our DPN, we will post these changes on our website so that you are aware of the information we collect and how we use it at all times.

**Data Protection Officer (DPO)**

If you have any questions, or complaints, in relation to our use of your personal information, you should first contact our DPO, on the details below:

**Canada Life Limited**  
**Canada Life Place**  
**Potters Bar**  
**Hertfordshire EN6 5BA**  
or by email at: [dpo@canadalife.co.uk](mailto:dpo@canadalife.co.uk)

**Canada Life International Limited**  
**Canada Life House**  
**Isle of Man Business Park**  
**Douglas**  
**Isle of Man IM2 2QJ**  
or by email at [FMRiskandCompliance2@canadalifeint.com](mailto:FMRiskandCompliance2@canadalifeint.com)

**CLI Institutional Limited**  
**Canada Life House**  
**Isle of Man Business Park**  
**Douglas**  
**Isle of Man IM2 2QJ**  
or by email at [FMRiskandCompliance2@canadalifeint.com](mailto:FMRiskandCompliance2@canadalifeint.com)

**Canada Life International Assurance (Ireland) DAC**  
**Irish Life Centre**  
**Lower Abbey Street**  
**Dublin 1**  
**Ireland**  
or by email at [CLIAIDPO@canadalifeint.ie](mailto:CLIAIDPO@canadalifeint.ie)

**Canada Life Limited is a trading name of Retirement Advantage, Stonehaven UK limited and MGM Advantage Life Limited registered at 110 Cannon Street London EC4N 6EU or by email at [dpo@canadalife.co.uk](mailto:dpo@canadalife.co.uk)**

In the unlikely event that you are dissatisfied with our response, you have the right to take the matter up with the Information Commissioner's Office (ICO), whose address is:

**England**

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

Tel: **0303 123 1113** (local rate) or **01625 545 745** (national rate)

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Scotland**

Information Commissioner's Office  
45 Melville Street  
Edinburgh, EH3 7HL  
Tel: 0303 123 1115

Email: [scotland@ico.org.uk](mailto:scotland@ico.org.uk)

**Wales**

Information Commissioner's Office  
2nd Floor  
Churchill House  
Churchill Way  
Cardiff, CF10 2HH

Tel: **029 2067 8400**

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

**Northern Ireland**

Information Commissioner's Office  
3rd Floor  
14 Cromac Place  
Belfast, BT7 2JB

Tel: **0303 123 1114** (local rate) or **028 9027 8757** (national rate)

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

**Ireland**

Office of the Data Protection Commissioner  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland

Tel: +353 (0578) 684 800 or +353 (761) 104 800

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

**Isle of Man**

Information Commissioner  
First Floor, Prospect House  
Prospect Hill  
Douglas  
Isle of Man, IM1 1ET

Tel: +44 1624 693260

Email: [ask@inforights.im](mailto:ask@inforights.im)

This DPN is dated 12 November 2019. Any future updates will be made available as described above.



**Canada Life**

Canada Life Limited, registered in England no. 973271. Registered office: Canada Life Place, Potters Bar, Hertfordshire EN6 5BA.  
Telephone: 0345 6060708 Fax: 01707 646088 [www.canadalife.co.uk](http://www.canadalife.co.uk) Member of the Association of British Insurers.

Canada Life Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

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