

# The Retirement Account

## Data Protection Notice

We take collection and management of your Personal Data very seriously.

This Privacy Notice (PN) explains how the information held by Canada Life (referred to as “Canada Life”, “we” or “us” throughout this notice) will be treated.

Any personal information provided to us by a policyholder, joint policyholder, employer policyholder, trustee, insured person, beneficiary, claimant or member (referred to as ‘you’ or ‘your’ in this PN), will be treated in accordance with current Data Protection legislation, and any successor legislation.

### What is personal information?

Personal information means any information about you which is personally identifiable, including your name, age, address, telephone number, email address, financial details, and any other information from which you can be identified. It will also include genetic and biometric data, 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.

### What do we collect?

We will collect the following information about you and your dependants (this includes your authorised Power of Attorney) when you use our services or we may collect it indirectly from our business partners, such as financial intermediaries:

- Personal details: your name, date of birth, telephone number, address, email address, dependants, marital status, IP address and media access control (MAC) address.
- Sensitive/special categories of personal data: gender and other sensitive information such as information about your physical and mental health. We recognise that information about health is particularly sensitive information.
- Financial information: information that may relate to your financial circumstances (for example your pension values, income and existing investments), bank account details and details of product options you may consider.
- Technical Information: such as details on the devices and

technology you use.

- Public Records: This includes open data such as the Electoral register, Land register or information that is openly available on the internet.
- Documentary data and national identifiers: Information that is stored on your passport, driving license, birth certificate, and National Insurance number.

As well as collecting personal information about you, we may also use personal information about other people, for example family members you wish to insure on a policy. If you are providing information about another person, then we expect you to ensure the other person knows you are doing so and are content with their information being provided to us. You might find it helpful to show them this PN and if they have any concerns to contact us directly. If personal information is submitted about another person (for example spouse/partner), then by signing this form, you confirm that they have agreed to providing their information for the information to be used and shared as set out in this PN.

### How your information will be used

Reference to “your information” and “your Personal Data” shall mean Personal Data and or / Special Categories of Personal Data (such as medical data), that is disclosed to us, for which an identifiable individual (Data Subject) is the focus.

The information provided to us may be used:

- To provide any requested product or service and to deal with any enquiries and requests we may receive;
- To verify your identity when you use our products or services and to ensure the security of your Personal Data;
- In relation to the performance of a contract with you or to take steps to enter into a contract with you;
- To communicate with you, for example if we are providing information about changes to the terms and conditions or if you contact us with questions;
- To underwrite and administer a Canada Life product. This may include an automated underwriting process taking into account the Special Categories of Personal Data provided;

- To prevent, detect or investigate financial crime;
- To better understand our customer and improve customer engagement. This may include research, statistical analysis and customer analytics which allow us to make certain predictions and assumptions about your interests, and make correlations about our customers to improve our products. We do not use policyholder, member or beneficiary personal data for marketing purposes and we do not make your personal information available to third parties for the purposes of direct marketing;
- For business to business marketing purposes we do use personal information of institutional investors, professional investors and advisers;
- With our underwriting software to process certain applications and produce quotations which will use an element of automated decision making. For more information about the logic involved, significance and envisaged consequences of the use of automated decision making please contact our Data Protection Officer using the contact information below;
- For the purposes of complying with applicable legal and regulatory obligations;
- To perform a task carried out in the public interest or in the exercise of official authority vested in Canada Life, your data controller.

Some of the information we collect as part of an application for a policy may be provided to us by a third party. This may include information we and our subsidiaries already hold about you and your dependant, including details from previous quotes and claims, information we obtain from publicly available records, our trusted third parties and from industry databases, including fraud prevention agencies and databases.

### Legal basis for processing:

Where processing of data is necessary for entering into a contract with Canada Life or for the performance of a contract which you (the data subject) are aware of the legal processing of Personal Data, this is based on Article 6.1(b) of the General Data Protection Regulation (GDPR).

Processing of Special Categories of Personal Data (for example health or medical data) is based on Article 9.2(g) of the GDPR in that processing is necessary for reasons of substantial public interest and conducted on the basis of applicable law where the only data processed will be that necessary for the aim specified in order to respect the Data Subject's rights and interests.

### Sharing Personal Data

Where necessary and only for the purposes mentioned above, information (including medical data) may be shared with:

- Other companies within The Canada Life Group (UK) Limited and any future owners of our business and/or affiliates;
- Service providers, such as reinsurers, third party administrators, professional advisors, tracing agencies and/or research companies;
- Doctors or any relevant medical professional;
- With credit agencies (for the purpose of identification verification);
- Agencies and third parties for the purposes of preventing, detecting or investigating financial crime; and/or
- Regulators, or such authority, if required to do so by law or by any court order or if we have consent to do so.

For retirement income, we insure risks assumed by us with special insurance companies (reinsurers). For this, it may be necessary to submit your contract data and claim data to a reinsurer, Hannover Re, so that they can form their own opinion about the risk. In addition, it is possible that the reinsurer supports our company due to its special expertise in the risk or claims assessment or other related purposes. We transmit your data to the reinsurer only insofar as this is necessary to perform the obligations of our insurance contract with you. Hannover Re will also act as Controller of your data. The fair processing notice for Hannover Re is available at

<https://www.hannover-re.com/privacy>.

Personal Data 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.

### Information Security

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the Personal Data we process. These measures are aimed at ensuring the on-going integrity and confidentiality of Personal Data. We evaluate these measures on a regular basis to ensure the security of processing.

### International Data Transfers

Your Personal Data may be processed outside of the European Economic Area (EEA). In this situation we confirm that only the minimum amount of data will be processed, and that we have put in place appropriate safeguards in accordance with the Data Protection legislation to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us using the details shown overleaf.

## Individual rights under GDPR

GDPR 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. Details of all individual rights are shown below:

1. The right to be informed – you have the right to be informed how your Personal Data will be used. For example this may be set out in a company's privacy notice.
2. The right of access – you have the right to access your Personal Data and supplementary information. For example you may wish to access your data to become aware of and verify the lawfulness of the processing.
3. The right to rectification – you have the right to have your Personal Data rectified. For example if you feel it is inaccurate or incomplete.
4. The right to erasure – you have the right in specific circumstances to request the deletion or removal of Personal Data where there is no compelling reason for its continued processing. For example, your Personal Data was unlawfully processed.
5. The right to restrict processing – you have the right to restrict the processing of your Personal Data in certain circumstances. For example you wish to contest the accuracy of your Personal Data.
6. The right to data portability – you have the right to obtain and reuse your Personal Data for your own purposes. For example you may wish to move, copy or transfer Personal Data from one information technology environment to another in a safe and secure manner.
7. The right to object – you have the right to object to your Personal Data being used for processing based on legitimate interests or for a task in the public interest. For example you no longer want your Personal Data to be used for direct marketing.
8. Rights in relation to automated decision making and profiling – you have the right to challenge decisions that are made using an automated approach including profiling. For example you may want to request human intervention where you do not agree with an automated decision.

Detailed information relating to your individual rights can be obtained via the Information Commissioner's Office – see 'further information' section for contact details.

## Retention of data

The data provided will not be used for any longer than is necessary and in accordance with FCA record keeping guidelines. Personal Data and Special Categories of Personal data will be:

- Deleted, or anonymised, after 6 months if the data used is for a product quotation that does not proceed to a policy
- Retained on file for 6 years after a policy has ended

## Notification of Changes to our Privacy Notice

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

If we decide to change our PN, 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.

If at any point we decide to use or disclose information we have collected, in a manner different from that stated at the time it was collected, we will notify you.

## Further Information

Should there be any queries regarding Personal Data or individuals rights under Data Protection legislation, please contact our Data Protection Officer in writing at:

**Canada Life**  
**110 Cannon Street**  
**London**  
**EC4N 6EU**

You also have the right to talk to the Information Commissioner's Office whose main role is to uphold information rights in the public interest.

Website: <https://ico.org.uk/for-the-public/>

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

Phone: 0303 123 1113

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

