

Privacy Notice

ReAssure - recipient of information

Who is ReAssure and its role:

ReAssure Ltd ("ReAssure", "we", "us", "our") of Windsor House, Telford Centre, Telford, Shropshire, TF3 4NB is a life assurance and pensions provider, and is classed as a 'Data Controller' for the purposes of the General Data Protection Regulation and Data Protection Act 2018. This means we're responsible for looking after the information we hold about you. ReAssure is committed to maintaining the confidentiality and security of your personal information. In this Notice, the term "personal information" means information about an identifiable individual.

This Notice is limited to ReAssure's activities in relation to personal information that is provided to us by Legal and General Assurance Society Limited ("Legal and General") in connection with the transfer of its insurance-based savings, pensions, life and with profits business to ReAssure.

Purpose of processing:

Legal and General, is proposing to transfer its insurance-based savings, pensions, life and with profits business to us, which will include the transfer of your policy. The proposed transfer will be carried out under the Financial Services and Markets Act 2000 and requires approval from the High Court before it can proceed.

Ahead of this proposed transfer, Legal and General have shared a copy of your personal information with us for the sole purposes of testing our IT systems in preparation for the transfer. As communicated to you by Legal and General, this is necessary as part of the planned migration of your insurance policies to ReAssure, to ensure that a similar level of service can be made available to you.

Legal basis of processing your personal information:

ReAssure is allowed to use your personal information where it is in our legitimate interests to do so and it is not unfair to you. We believe that we have a legitimate interest in testing our IT systems to ensure that they run smoothly and that a smooth migration of your insurance policies to ReAssure can take place.

Categories of personal information collected:

The data which Legal and General have shared with us include the following categories of personal information:

- contact details (including, for example, your name, address, telephone number and email address); and
- policy details and claims information (including, for example, your policy number, national insurance number, bank details, policy documents, policy related notes and correspondence).

This data has been shared with us to ensure that it is compatible with our IT systems.

Disclosure of personal information:

Where appropriate and in accordance with applicable laws and requirements, we will share your personal data, in various ways and for various reasons, with the following categories of people:

- any of our group companies;
- appropriate colleagues within ReAssure (this may include colleagues in overseas offices);

- tax, audit, or other regulatory authorities and/or law enforcement bodies, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- third party service providers who perform services on our behalf (external suppliers and consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place; and
- in the event of corporate operational requirements, or a merger or acquisition, we may need to share your information internally within the ReAssure group, and with third parties as part of our due diligence, transaction and IT system testing.

We require that the organisations with whom we share personal information maintain the confidentiality of personal information in accordance with applicable law and only use such information for the specific purpose for which we supply it to them.

International transfers of personal information:

In some circumstances, the sharing of personal information with third parties or other group companies may involve the storage or processing of personal information outside the United Kingdom, including, without limitation, certain third parties in the United States.

We will take appropriate steps to ensure that any international transfer of personal information is carried out in accordance with applicable privacy laws and the means of transfer provides adequate safeguards in relation to your personal information, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal information by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws; or
- where recipients of personal information in the United States are signed up to the EU-U.S. Privacy Shield Framework in respect of transfers of personal information from entities in the EU to entities in the United States or any equivalent agreement in respect of other jurisdictions; or
- transferring your personal information to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract; or
- where you have consented to the data transfer.

The protection of such personal information will be subject to the legal requirements of the jurisdictions where the information is transferred, including lawful requirements to disclose information to government authorities in those countries. If you have any questions about the collection, use, disclosure or storage of personal information, please contact us as indicated below.

Retaining your personal information:

We will retain and process your personal information for as long as necessary for the purposes outlined in this Notice (which we anticipate being four months from the time you receive the

communication from Legal and General regarding the potential transfer of business) or as required under law or regulation.

When it is no longer necessary to retain your data, we will delete the personal information that we hold about you from our systems, or put it beyond use until it can be permanently deleted to the extent this becomes possible.

Security:

Strict security controls are in place to ensure your personal information is processed securely and only for the purposes outlined in this Notice. We take all reasonable precautions necessary to protect your personal data from misuse, interference, loss, unauthorised access, modification or disclosure.

Your Rights:

You have the following rights in relation to our processing of your personal information:

- you can object to us processing your personal information in certain circumstances;
- you can ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- you can ask us to delete the information that we hold about you in certain circumstances (for example, where we no longer need the information);
- you may in some cases restrict our use of information about you (for example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy);
- if information is incorrect you can ask us to correct it;
- you may have the right to ask us to assist you in transferring your personal information to a third party; and
- you can lodge a complaint with your local supervisory authority.

If you wish to exercise any of these rights, please make your request in writing to:

The Data Protection Officer, ReAssure, Windsor House, Telford, TF3 4NB.

In some circumstances, we may not be able to provide you with access to your personal information or parts of it. We will advise you at the time of the request.

Source of your personal information:

We have received your information from Legal and General.

Contacting us:

We encourage you to bring any matters to our attention that you may not be satisfied with. If you'd like to contact our Data Protection Officer (DPO) with an inquiry or complaint about this Notice or our personal information practices, or would like any more information, you can write to:

The Data Protection Officer, ReAssure, Windsor House, Telford, TF3 4NB.

You can call or write to us to make a complaint by using the contact details on our website.

If you're not happy with our response you can raise your concerns with the Information Commissioners Office (ICO) by visiting ico.org.uk. They also have a Helpline open Monday to Friday 9am to 5pm on 0303 123 1113.