

Website Privacy Policy

Introduction

Welcome to Sanlam's website Privacy Policy.

Sanlam respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Policy together with our [Website Terms of Use](#) and [Cookie Policy](#) apply to your use of the Sanlam website and by continuing to use the Sanlam website you will be consenting and agreeing to each of these terms.

Purpose of this Website Privacy Policy

This Privacy Policy aims to give you information on how Sanlam collects and processes your personal data through your use of this website and Online Valuation Facilities (defined below), including any data you may provide through this website when you submit a request via the 'Contact Us' facility on our website.

This Website Privacy Policy also applies if you register for and access valuations via Sanlam Investment and Pensions' Planholder View Online and/or Sanlam Private Wealth's Sanlam Connect portal (together "Online Valuation Facilities"). If you access the Sanlam Connect Online Valuation Facility (referred to below) an additional Cookie Policy will apply which is available on the Sanlam Connect portal.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Data Controller

Sanlam UK Limited is the data controller and responsible for this website (<https://www.sanlam.co.uk>) and the data you may submit when using this website.

Sanlam Private Wealth is the data controller in respect of the Sanlam Connect portal.

Sanlam is made up of different legal entities. [Full details of the Sanlam group of companies can be found here](#). This Privacy Policy is issued on behalf of the Sanlam Group, whose products and services are described on the various Sanlam websites, so when we mention "Sanlam", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the Sanlam Group responsible for processing your data.

We will let you know which entity will be the data controller for your data when you apply for a product or service with us and you will be referred to our [Privacy Statement](#).

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please use the contact details set out below.

Data Protection, Sanlam, One Temple Quay, 1 Temple Back East, Bristol, BS1 6DZ. Or you can email: dataprotection@sanlam.co.uk, or write to Data Protection, Sanlam, One Temple Quay, 1 Temple Back East, Bristol, BS1 6DZ.

You have the right to make a complaint at any time to the [Information Commissioner's Office \(ICO\)](#) <<http://www.ico.org.uk>>, the UK supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We may update this Privacy Policy from time to time, you should check our website periodically to ensure you have

the latest version.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party and Sanlam group company websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We only collect limited personal data from our website. For example, Sanlam products and services cannot be applied for or opened via our website. So we only obtain personal data which you, or those acting on your behalf, may submit to us via the “Contact Us” facility or if you submit an online feedback, survey or event form, respond to a job advert, enter into a competition or promotion, or you register for our Online Valuation Facilities.

Our Online Valuation Facilities allow you to access information relating to your Sanlam service and/or accounts including valuations, account documentation and related records. Where you access an Online Valuation Facility you acknowledge we will process any personal data which you and/or your financial adviser or portfolio manager (as applicable) will have supplied to Sanlam. The relevant application form(s) and our Sanlam Client Privacy Statement you will have been provided with also explain how we use your personal data.

When you access the Sanlam website we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes name, username or similar identifier title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address (which is used to connect your computer to the internet), your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password (if you access either of the Online Valuation Facilities), feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share information showing how our websites are used however, this is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may use this information to calculate the percentage of users accessing a particular page or specific website feature and to analyse how we can improve our website functionality, products and services, customer relationships and experiences. This helps us to develop our business and inform our marketing strategy. Please see our Cookie Policy for further information about this and how we use third party analytics to assist us.

If you open an email from us we may automatically collect technical information including browser type, device type, whether an email was opened and/or unsubscribed from. This information does not constitute personal data.

We do not ask for any **Special Categories of Personal Data** about you via the website (this includes details about your race or ethnicity, religious beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

When you use our website we use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by submitting a request via the “Contact Us” Facility on our website, filling in survey or response forms via our website or by corresponding with us by post, phone, email or otherwise, or requesting and accessing our Online Valuation Facilities. This includes personal data you provide when you:
 - raise any queries with us regarding your account(s) and, more generally, about our products or services; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect information about your equipment, browsing actions and patterns (including your internet protocol (IP) address). We collect this personal data by using cookies and other similar technologies. We will not obtain or store personally identifiable information about you from our cookies. Please see our **Cookie Policy** for further details.
- **We may receive information from other sources,** such as persons you have appointed as your agent, providers of identity checking services (credit reference agencies), other Sanlam group companies, or publicly available sources such as Companies House.

You are entitled to browse our website without disclosing any personal information.

How we use your information

You will be informed of the way in which we will use your personal information before you submit it.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data from your use of the website for the following lawful purposes, to:

- Perform the contract we are about to enter into or have entered into with you, for example to respond to a query you have submitted via the “Contact Us” facility on our website, to administer access to our Online Valuation Facilities (if applicable), or otherwise to manage our relationship with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, for example to update our records, to prevent fraud, or to respond to a query via the “Contact Us” facility on our website.
- Where we need to comply with a legal or regulatory obligation, for example to detect and prevent fraud or money laundering, to update your marketing communications preferences and correspond with you accordingly, or to verify your identity.

We may also use your data to administer, improve and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data. This would be for our legitimate interests (for running our business, provision of administration or IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring), or alternatively to comply with a legal obligation.

Marketing

You may receive marketing communications from us if you have specifically requested this from us or where we are otherwise legally entitled to do so, and, in each case, you have not opted out of receiving that marketing.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes explained above.

- Sanlam group companies and who provide IT and system administration services, customer support services and for group reporting purposes.
- Third party service providers of IT and system administration services and identity checking services, based in the EEA.
- Third parties such as Her Majesty's Revenue & Customs, our regulators, and law enforcement agencies based in the UK who may require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will never sell your personal data to a third party.

International transfers

We may share your personal data within the Sanlam Group and in addition, the information you give us may be transferred to countries outside of the UK and the European Economic Area (EEA). These countries may not have similar data protection laws to the UK.

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection in relation to personal data by the UK Information Commissioner (ICO)
- Where the country to which we are transferring your data is not subject to a finding of adequacy, we will use specific contractual provisions approved by the ICO which provides a similar contractual level of protection to that provided under law in the UK.
- Where we use providers based in the USA, we may transfer data to them. It is important to note that the Privacy Shield is now not considered as effective protection, and we instead we will use specific contracts approved by the UK's ICO which provides a similar contractual level of protection to that provided under law in the UK, however USA local and federal security laws may override these contracts.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Email addresses: Where you have requested us to contact you we will communicate with you via email and/or telephone, depending on what you have specified. By doing so, you acknowledge that because of the nature of the internet the security of emails cannot be guaranteed.

Telephone Calls: We may also collect, record, access, monitor, store and use recorded telephone calls for regulatory compliance, for training purposes, to help with the establishment of facts in the event of a complaint, for the prevention and detection of crime, to ensure compliance with our processes and procedures (as amended from time to time).

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. If you become a customer of any Sanlam company we will retain information about our customers for at least seven years after they cease being

customers for legal and regulatory purposes.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data, see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

If you fill in the lead extension form within a Google paid ad, Google will hold your data outside of the European Economic Area (EEA) for a 30-day period before it is deleted. We will use this information to respond to your enquiry. Information you provide through Google lead extensions will be removed 90 days after responding to your query

If you fill in the lead extension form within a Facebook paid ad, Facebook will hold your data outside of the European Economic Area (EEA) for a 90 day period before it is deleted. We will use this information to respond to your enquiry. Information you provide through this method will be removed within 90 days after responding to your enquiry

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please use the contact details above.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you as soon as practicable and thereafter keep you updated.

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