

Privacy statement

Keeping your data confidential

Privacy statement

This *Privacy statement* explains why we collect personal data, what personal data we collect and how we use it. Your rights in respect of your data are also explained.

Sanlam's data privacy statement

You entrust Sanlam with your important information and we take our responsibilities seriously. We are committed to protecting and respecting your personal data.

1. What is the purpose of this *Privacy statement*?

This *Privacy statement* explains how Sanlam looks after your personal data when we provide our services and products, in accordance with applicable legislation intended to protect your personal data and privacy, including the General Data Protection Regulation and related rules. We also explain what your rights are.

By providing your personal data, you acknowledge that we will only use it in accordance with this *Privacy statement*.

Where we refer to 'Sanlam' or 'we', we mean the relevant Sanlam UK group company (or companies) providing your product and/or service, details of which are set out at the end of this document. The Sanlam group includes a life and pensions company; financial advice companies; investment and fund managers; and companies which provide wrapper products such as ISAs and related investment and administration services.

This statement applies where any of the Sanlam companies acts as data controller, which is where we are responsible for deciding how we hold and use your personal data. The terms governing your Sanlam product or service will explain which Sanlam company is processing your personal data and is therefore responsible for compliance with the relevant data protection law.

It is important that you read this statement together with any other privacy notice we may provide on specific occasions, so you are aware of how and why we are using your personal data.

2. How will we use your personal data?

Data protection laws require that the personal data we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept secure and confidential; and
- kept only as long as necessary for the purposes we have told you about.

3. How do we ensure the security of your personal data?

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 use your data. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

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

As part of our data security measures, we ensure that we train our employees and have appropriate data protection policies in place to support our compliance.

4. What kind of personal data may we hold about you?

Personal data means any information about an individual from which that person can be identified.

In order to provide our products and services, depending on which you select, we may collect the following types of personal data about you:

- contact details such as name, address(es), telephone number(s), email address(es);
- identification information such as signature; date and place of birth; gender; nationality; residency; national insurance number or other national identity number (such as a passport number); driving licence; photo identification; tax identification numbers and tax rate; income and financial details; source of funds; bank or building society account details; policy details; nationality; citizenship; tax residency; marital status; occupation; benefits and entitlements; employment status; employer; and job title;
- investment goals, assets, income protection and care needs and lifestyle (for advice services); and
- full name, gender, date and place of birth and address of any child for whom you are investing in a Junior ISA; images captured by CCTV cameras on our premises; recordings of telephone conversations and electronic communications with our staff.

We may also collect, store and use special or sensitive personal data such as information about your physical health (such as height, weight, smoker status, alcohol intake and medication); mental health; racial or ethnic group; or sexual orientation. We will collect information about the amount invested in your Sanlam account, withdrawals made, investments held, fees paid, client communications, date of death and username, password and log in details if you use any of our online client portals.

We may also collect, store and use information concerning criminal proceedings and offences. We must have an additional legal ground to use this type of personal data and this is explained below in section 7.

We also collect, store and use personal data, where you have provided this to us, in respect of third parties, such as beneficiaries, spouses, civil partners or dependants. If you do so, you are responsible for and confirm you are entitled to provide us with this information and that you have informed those third parties of our identity and the purposes for which their personal data (including sensitive personal

data) will be processed. You should draw their attention to this *Privacy statement*. We will not use such information except for the purpose for which you have provided it.

5. How may we collect your personal data?

We may collect personal data from you in a number of ways, depending on the service or product you have, including:

Information you give us.

You may choose to provide us with your personal data:

- by completing contact or registration forms on our website.
- by registering for, or consenting to, receive our marketing information including our *Wealthsmiths Magazine*•
- by submitting a request via the 'Contact us' facility on our website for us to contact you;
- by corresponding with us by telephone, email, letter or other means;
- by applying for a product or service;
- in discussion with one of our authorised representatives or financial advisers;
- by participating in feedback or surveys or by providing contact details offline; or
- (for Sanlam Wealth Planning clients) if you submit a request to use Sanlam 365, the Personal Finance Portal.

Information we collect about you.

We may automatically collect technical information such as your internet protocol (IP) address if you use our website. (We will not obtain or store personally identifiable information about you from our cookies, please see our 'Cookie policy' on our website for more information.)

Information we receive from other sources.

- We may receive information from third parties, such as your appointed agent, your financial or tax adviser, another financial services provider (such as a pension provider or insurance company), a health professional or your employer.
- We may receive information from companies we use to verify your identity and/or to prevent fraud such as credit reference agencies (please note such companies may record the details of the search), including the electoral register and credit information, in accordance with our legal obligations.
- We may also receive information from third parties who contact us such as Her Majesty's Revenue & Customs (HMRC), the Department for Work & Pensions (DWP) or the police or other government agencies.

- We may obtain personal data from public sources such as Companies House.

Please note calls may be recorded in order to monitor the quality of customer service, for training purposes or where we are legally required to do so.

6. How will we use your personal data?

We use your personal data to provide your product or service to you, and to comply with our legal obligations. We set out the main reasons why we process your personal data and the applicable circumstances below.

To perform the contract we have entered into with you.

For example to:

- provide an investment proposal or financial advice;
- set up and administer any products or services you may have taken out with Sanlam, which includes calculating valuations, settling claims, paying benefits, underwriting and providing reports to you in respect of your Sanlam product and/or service;
- manage your investments;
- provide other related services in respect of which you have contracted with Sanlam;
- carry out your instructions;
- confirm your identity and to communicate with you; and
- exercise our rights in our agreements.

To comply with a legal obligation.

For example:

- where we are required to use your personal data and maintain records of our dealings with you by our regulators such as the Prudential Regulation Authority (PRA), Financial Conduct Authority (FCA), Information Commissioner's Office (ICO) and HMRC;
- to respond to complaints and data subject requests (see section 12 below); and
- to investigate, prevent or detect crime.

Where it is necessary for our legitimate interests (or those of a third party) provided your interests and fundamental rights do not override those interests.

For example:

- to establish, exercise or defend our legal

rights, where we are faced with any legal claims or where we want to pursue legal claims ourselves;

- to prevent, investigate and detect fraud and carry out fraud, credit and anti-money laundering checks;
- to respond to and manage ad hoc enquiries and complaints;
- to provide management information to enable us to monitor our performance and understand our business, to maintain our business records, to manage our financial position and business capability, to receive professional advice, to improve our products and services and for training purposes;
- for accounting, auditing purposes and corporate governance purposes;
- to assist with debt recovery;
- for crime detection;
- to check the performance of IT systems;
- to provide and improve customer support;
- to manage risk for us and our customers;
- to make Sanlam 365, the Personal Finance Portal available (to applicable Sanlam Wealth Planning clients); and
- where applicable, to undertake appropriate systems testing and data migration when appointing material suppliers and third party outsourcing service providers who require such access to provide their services.

Where we have obtained your explicit written consent to do so.

For example to:

- process your sensitive personal data or criminal offences information (see section 7 below); and
- provide you with marketing services, including including events, information about Sanlam or its products and services and related information, which may be provided by other Sanlam group companies.
- to provide you with access to and information about marketing activity that you have specifically registered for, such as a virtual event.

On rare occasions, we may also use your personal data where we need to protect your interests (or someone else's interests) or where it is needed in the public interest, for example for the investigation, detection and prevention of crime.

In order to administer your contract and comply with our legal obligations, we will send you reports, valuations and related communications in respect of your Sanlam product or service, which are not marketing communications. As part of our value added service to you, we will send you our Wealthsmith Magazine and invitations to Sanlam events (either by post or email) where we have your explicit consent to do so.

7. How will we use sensitive personal data?

We may process special or sensitive personal data, and criminal offences information, with your explicit written consent, for example in order to provide appropriate financial advice or to administer or pay out benefits under a contract you have with us (as applicable), and in other limited circumstances:

- where we need to carry out our legal obligations as explained in this *Privacy statement*; and
- where it is in the public interest, such as for equal opportunities reporting or the prevention and detection of unlawful activity such as fraud.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

If you provide this type of information on behalf of a third party, we will ask you to confirm that the third party has provided his or her consent for you to act on their behalf.

8. If you choose not to provide or update personal data

If you do not provide certain information requested, we may not be able to provide your Sanlam product or services and we may not be able to comply with our legal obligations, such as verifying your identity and complying with anti-fraud and anti-money laundering rules. It could mean we have to cancel a product or service you have with us.

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. From time to time, we may write to you to check that the details we hold about you are correct.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

9. Who may we share your personal data with?

We may have to share your data with third parties, including third-party service providers (such as our outsourcing partners, contractors and designated agents), as well as other companies in the Sanlam group with whom we deal as part of the operation of our services. We will always require those third parties to respect the security of your data and to treat it in accordance with the law and only for the purpose for which we obtained it.

Why might we share your personal data?

We may share your personal data with third parties where required by law, where it is necessary to provide our services, to administer your contract with us or where we have another legitimate interest in doing so, in each case for the purposes described in this *Privacy statement*.

We may share your personal data with third parties, including Sanlam group companies, who we use to provide our services and products, such as custodians, administrators, fund providers, investment platforms and exchanges, banks, brokers, third-party product providers you have selected, investment managers and risk-profile providers, in accordance with our contractual and legal obligations. These third parties may also be data controllers in their own right and have their own privacy policies.

We may also share your personal data with the following third-party service providers who support the provision of our products and services: IT and back office administration services; technology providers and suppliers of digital storage services (the 'cloud'); provision of online client portal; payroll for pension payments; identity verification, anti-fraud and anti-money laundering checks (including through credit reference agencies); transaction reporting; archiving facilities; professional advisers and other service providers (such as actuaries); printers; tracing agents; debt collection agencies; property managing agents; compliance services; survey and marketing communication providers; Direct Debit schemes; reinsurers; insurers (for example, in the context of claims); claims handlers; underwriters; disaster recovery

specialists; financial services providers; healthcare providers (such as insurers); and other suppliers we may use.

Where we are under a legal duty to do so, we may share your personal data with HMRC and other tax authorities, the FCA, the PRA, the Financial or Pensions Ombudsman services, the DWP, the courts, the police and other law enforcement agencies.

We will share your personal data with your financial adviser or other person or company you have authorised to deal with us on your behalf.

We will share your personal data for our legitimate interests with other entities in our group as part of our regular reporting activities on company performance, for business development and trend analysis purposes, for fraud detection and prevention, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data. We may share information between companies in the Sanlam group so that group companies can inform you of other relevant products and services those companies provide where you have agreed to receive such information or otherwise where we are lawfully permitted to do so. The list of such companies who may contact you in this way is at the end of this document.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business.

We will not sell your details to any third party. We will not use your personal data for marketing purposes without your explicit written consent. We do not use automated decision making or profiling.

How secure is your information with third parties?

We will only share your personal data for the purposes specified in this *Privacy statement* and on the basis that it will be kept confidential and will only be used for the reasons described.

10. Transferring information outside the European Economic Area (EEA)

Sanlam does not typically transfer much personal data outside the EEA. However, on a limited basis we may transfer the personal data we collect about you to the following countries outside the EEA:

- South Africa (to Sanlam group companies), in order to provide compliance and internal audit checks on the services and products Sanlam provides, and for group compliance, operations, actuarial, legal and risk reporting purposes; and
- USA, as part of our internal administration for IT and Cloud based services, for the provision of some of our services which are provided to you by third parties located in the USA.

We will take the appropriate steps required by applicable data protection laws to ensure your personal data is protected by putting in place standard contractual obligations to ensure your personal data is treated consistently with EEA and UK data protection.

If you require further information about these protective measures, you can request it using the contact details at the end of this *Privacy statement*.

11. How long will we use your information for?

We will keep your personal data for as long as you are a customer of Sanlam. Thereafter, we may keep your data for up to seven years to enable us to respond to any questions or complaints and to maintain records where we are required to do so. We may keep your data for longer than seven years if we cannot delete it for legal, regulatory or technical reasons, for example in relation to a pension contract.

To determine the appropriate retention period, we consider the type of contract you have with Sanlam, the quantity, 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, whether we can achieve those purposes through other means, and any applicable legal requirements to retain such personal data for prescribed periods. Where we retain your data, we will make sure your privacy is protected and only use it for the purposes described above.

In some circumstances, we may anonymise or pseudonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

12. Your rights in connection with personal data

You can ask us to do certain things with your personal data such as provide a copy of it, correct it or even delete it.

There may be occasions where we cannot comply with a request and we will tell you if this is the case and give our reasons. This will usually be for legal or regulatory reasons.

Under certain circumstances, you have the right to:

- **Request access to your personal data ('data subject access request').** This enables you to confirm whether we process your personal data and to receive a copy of the personal data we are processing and certain information about how we use your personal data.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request the erasure of your personal data.** You can ask us to delete or remove personal data where the processing is no longer necessary for the original purpose, or where you withdrew your consent, or the processing is unlawful or your personal data must be erased to comply with the law. However, in some cases, if we have another legal basis or legitimate interest for processing your personal data, we may not be able to comply. We will tell you if this is the case.
- **Request the restriction of processing of your personal data.** You can ask us to restrict the processing of personal data where you think the personal data we hold is inaccurate until we can verify its accuracy, or you believe we no longer need to process your personal data (but you do not want it erased), or you wish processing to be restricted pending confirmation that our processing is based on our overriding legitimate interest.

Object to the processing of your personal data

You have the right to object to us processing your personal data where we are doing so:

- based on our legitimate interest (for the purposes described in this *Privacy statement*) unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and
- for direct marketing purposes.

Please note that by exercising this right, it is possible that Sanlam will no longer be able to continue to provide its products or services or administer its contract with you. In such circumstances you would need to consider transferring to another provider.

- **Request the transfer of your personal data to another party.** In certain circumstances, you can ask us to send your personal data to a third party of your choice. For example, where it is information that is processed by us by automated means and you have consented to such processing or we need to process the information to perform our contract with you.
- **Right to withdraw consent.** If you have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This would not affect the validity of the processing prior to such date. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Please note that it will take approx 30 days for us to update our internal records from receipt of your requests and you may receive communications from us during this period.

Please note that by exercising this right, it is possible that Sanlam will no longer be able to continue to provide its products or services or administer its contract with you. In such circumstances you would need to consider transferring to another provider.

How do you exercise your rights?

You can make a request by contacting Sanlam via a number of ways set out below. However, we will always ask you to confirm your request in writing.

You will not usually have to pay a fee to exercise any of your rights. However, we may charge a reasonable administration fee or not comply with a request if a request is clearly unfounded, excessive or repetitive so as to be deemed vexatious.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

13. What if you have queries about this *Privacy statement* or the way Sanlam uses your personal data?

If you wish to exercise any of your rights, or you have any questions about this *Privacy statement*, how we handle your personal data or if you wish to make a complaint, please contact us as follows:

Data Protection

Sanlam
One Temple Quay
1 Temple Back East
Bristol, BS1 6DZ

E clientservices@sanlam.co.uk

T 03330 155 600

Monday to Friday from 9am to 5pm
(excluding Bank Holidays).

14. Right to complain

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the ICO at:

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

T 0303 123 1113

www.ico.org.uk

15. Changes to this *Privacy statement*

We reserve the right to update this *Privacy statement* at any time. We may also notify you in other ways about the processing of your personal data. You should check our website at www.sanlam.co.uk periodically to view the most up to date *Privacy statement*.

16. Sanlam companies

This *Privacy statement* applies to the activities of the following Sanlam group companies, whose identity and details are provided in the relevant terms governing your product or service:

- Sanlam Life & Pensions UK Limited, Sanlam Financial Services UK Limited (trading as Sanlam Investments and Pensions) and Sanlam Trustee Services UK Limited, which provide life and pension products and a wrap administration service for onshore bonds and ISAs.
- Sanlam Wealth Planning UK Limited which provide financial advice.
- Sanlam UK Limited and Sanlam Investment Holdings UK Limited, which are our holding companies. Sanlam UK Limited provides our website.

The above companies' registered office is: Monument Place, 24 Monument Street, London EC3R 8AJ.

- Sanlam Private Investments (UK) Limited and Sanlam Securities UK Limited, which provide retail and institutional investment management services comprising discretionary and advisory fund management and stockbroking. The registered office for these companies is Monument Place, 24 Monument Street, London EC3R 8AJ.

Sanlam Private Wealth and Sanlam Wealth are trading names of Sanlam Private Investments (UK) Ltd (SPI, registered in England and Wales 2041819), Sanlam Wealth Planning UK Ltd (SWP, registered in England and Wales 3879955), Sanlam Life and Pensions UK Ltd (SLP, registered in England and Wales 980142), Sanlam Trustee Services UK Limited (STS, registered in England and Wales 01489455), Sanlam Securities UK Limited (SSUK, registered in England and Wales 01825671), Sanlam Investment Holdings UK Limited (registered in England and Wales 07812240), Sanlam UK Limited (SUK, registered in England and Wales 06575962) and Sanlam Financial Services UK Ltd (SFS, registered in England and Wales 2354894). SPI, SWP, SSUK and SFS are authorised and regulated by the Financial Conduct Authority. SUK is an appointed representative of SLP, SFS, SPI and Sanlam Investments UK Limited. SLP is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Registered office for SPI and SSUK: Monument Place, 24 Monument Street, London EC3R 8AJ. Registered office for SWP, SLP, SFS, STS, SIH and SUK: Monument Place, 24 Monument Street, London, EC3R 8AJ.

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