



Privacy policy

22nd May 2018

WHO ARE WE?

This Website is operated and provided by The Royal London Mutual Insurance Society Limited and is registered under the data protection laws in the United Kingdom and takes all reasonable care to prevent any unauthorised access to your personal data.

The Royal London Mutual Insurance Society Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, provides life assurance and pensions and is a member of the Association of British Insurers and the Association of Financial Mutuals. Registered in England and Wales number 99064. The registered office of The Royal London Mutual Insurance Society Limited is 55 Gracechurch Street, London, EC3V0RL United Kingdom.

Please read carefully and understand our Privacy Policy together with the [Terms of Use](#) ("Terms") and our **Cookie policy** which govern your use of this Website.

We respect the privacy of every individual who visits our website ("Site") and have developed this policy because we want you to feel confident about the privacy and security of your personal information.

By using our Site you acknowledge that you have read, and understood the terms of this privacy policy and the use of personal information described.

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. From May 2018, 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 TYPES OF PERSONAL INFORMATION DO WE COLLECT FROM YOU?

We collect the following information about you and any dependants (which may include your authorised solicitor who is acting in the capacity of Power of Attorney) when you use any of our products or services and we may also collect personal information indirectly from our business partners, for example financial intermediaries:

Personal data: 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.



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 and cookies information: information to measure and analyse the use and effectiveness of our services, and to customise the targeting of advertising relating to our services.

HOW WE PROCESS YOUR PERSONAL INFORMATION

We will process your personal information for our legitimate interests for the following purposes

- a) to identify and advise on which products or services best suit your requirements or needs;
- b) for administration and to support your choice through updates on policy or product changes;
- c) allow you to create an account and communicate with us;
- d) to invite you to take part in customer research, potentially using specialist market research ;
- e) to comply with legal and regulatory obligations;
- f) for business and analysis purposes; including protecting your data through secure storage and backups
- g) for the prevention and detection of fraud.

MARKETING AND CONSENT

The Royal London Mutual Insurance Society Limited provide an extensive range of different products and services and may use the personal information you have provided to distribute across the group (when applicable) to help identify and tailor products and services that may be of interest to you.

In order to:

- obtain your marketing preferences and communicate with you in accordance with preferences or options you have selected; through email, telephone or sms;
- to send you marketing literature covering our range of products and services and may continue to do this after your policy has ended; and
- use your personal data for automated decision-making, including profiling for research and marketing purposes as well as actuarial and statistical analysis.

We will seek to obtain your explicit consent where we are required to process any special categories of personal data (such as, medical information);



In the event that we intend to process your personal data for new purposes requiring your consent, we will contact you to obtain your consent for such new purposes.

WHO WE MAY SHARE YOUR PERSONAL INFORMATION WITH

The personal information we hold about you may be shared with the following recipients subject to security, contractual and transfer adequacy safeguards as appropriate:

- (a) our group affiliates;
- (b) our agents; and
- (c) business partners/service providers who assist us in providing the services we offer through our website applications and third party comparison portal(s).

The following categories of agents, business partners and close affiliations assist us in the provision of ancillary services and only use your personal information to the extent necessary to perform their functions:

- Providers for pricing/underwriting purposes: these providers may share your personal information with their group companies for the same purpose.
- Service providers: for the provision of support services such as reinsurance, product administration, receiving and sending marketing communications, data analysis and validation, IT support services, archiving, auditing, business administration and other support services and tasks, from to time.
- Business partners who may have referred you to us: to provide them with relevant management information.
- Other companies in the event we undergo a re-organisation or are sold to a third party.
- Regulators and public authorities who have a legal right to request and process your personal information.

We may also disclose your personal information if legally entitled or required to do so, for example if required by law or by a court order or if we believe that such action is necessary to prevent fraud or cybercrime or to protect the Site or the right, property or personal safety of any person.

DATA RETENTION AND ANONYMISATION

Where we have provided you with a service, we will keep your personal information for as long as is necessary for the purposes described in this policy (in line with the data minimisation principle) for a maximum period of 7 years after the service has expired, after which your personal information will be deleted or anonymised in compliance with our established data protection policy.

Anonymised personal information will not be considered as personal since no individual can be identified by that information. We use anonymised information for further actuarial and



business analysis, business research and reporting to help us to develop our products and services.

COOKIE USE AND COOKIE POLICY

When you visit any website including ours, they will use cookies, which are small files downloaded to your computer or mobile device. Most web browsers are set to accept cookies when you first visit a web page. Cookies may contain information about your general internet usage; the type of internet browser or mobile device in use; your IP address and operating system and how you have arrived on our web page.

When you visit our website or web page, we will only use this information to assist us in providing a more effective service and to collect broad demographic information for aggregate use and to help us to improve our website to deliver a better and more personalised service to:

- (a) estimate our audience size and usage pattern;
- (b) store information about your preferences, and allow us to customise our website according to your individual interests;
- (c) speed up your searches; and
- (d) recognise when you return to our Site.

When you visit our website, you can change your cookie preferences through your browser settings.

Please refer to our **cookie policy** for a full explanation, cookie use and your management options for the control of cookies.

MONITORING OUR COMMUNICATIONS WITH YOU

We may monitor or record your calls and text messages and other communications, such as emails, in accordance with UK law, and in particular for business purposes such as:

- (a) quality control and training;
- (b) processing necessary for the entering into or the performance of a contract;
- (c) to prevent unauthorised use of our telecommunications systems and web sites and/or services;
- (d) to ensure effective systems operation;
- (e) to meet our legal obligations;
- (f) in your vital interests;
- (g) to prevent or detect crime; and
- (h) in relation to our legitimate interests.



TRANSMISSION AND SECURITY OF YOUR PERSONAL INFORMATION

We have security measures in place to protect against the loss, misuse and alteration of personal information under our control as required by current data protection laws and, as of May 2018, the EU General Data Protection Regulation 2016/679 ("GDPR").

For example, our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal information. Whilst we cannot ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it.

TRANSFERS OF PERSONAL DATA OUTSIDE OF THE EEA

Your personal data is sent to and stored on secure servers located in the UK or other countries within the European Economic Area (EEA). In the event that your information is transferred outside the EEA (e.g. because any of our advisors or service providers have IT systems located in other jurisdictions), we will ensure that your data is subject to appropriate safeguards, including relying on a recognised legal adequacy mechanism that it is treated securely and in accordance with our privacy policy.

NOTIFICATION OF CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend or modify the privacy policy at any time and in response to any changes in applicable data protection and privacy legislation.

If we decide to change our privacy policy, we will post those changes on this page and may place notices on other pages of our Site, so that you are aware of the information we collect and 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.

YOUR RIGHTS TO YOUR PERSONAL INFORMATION

You have options and choices over how we use your personal information. [We may provide you with the tools to manage your account or to change your marketing communication preferences at any time.] We may retain a record of your stated objection to the processing of your personal information including in respect of an objection to receiving marketing communications, for the sole legitimate purpose of ensuring that we can continue to respect your wishes and not contact you further, during the term of your objection.

In terms of your rights, you can:

- Request to see the personal information we hold on you.
- Request your data to be corrected or erased where appropriate.



- Restrict/object to the processing of your personal data whilst we investigate your concern.
- In certain circumstances, where your request relates to data you provided to us and where technical possible, you may request to receive your personal data in a commonly used electronic format or send the data in that format to another provider.
- Withdraw your consent to certain processing activities at any time. For example, to object to direct marketing or profiling for market research and marketing purposes.

Requests for your personal information shall be provided free of charge. However, where requests are repetitive, or manifestly unfounded or excessive, we may charge you a reasonable fee to cover the administrative costs of providing the information, or may refuse to act on the request

If you have any questions or comments about this privacy policy or our practices, or if you wish to make a request or exercise any of your rights, you can contact us:

- By telephone on: 01737 233288
- By writing to us at: The Data Protection Officer, Royal London, Royal London House, Alderley Road, Wilmslow, Cheshire SK9 1PF

If you remain unhappy with a response you receive from us, you can also refer the matter to the [Information Commissioner's Office](#).

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Cookie policy

IP Address and Cookies

When you visit this website we may automatically collect additional information about you such as the type of internet browser or mobile device you use, any website from which you have come to the website and your IP address (the unique address which identifies your device on the internet) and your operating system, which are automatically recognised by our web server. You cannot be identified from this information and it is only used to assist us in providing an effective service on the website and to collect broad demographic information for aggregate use.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer or device. Cookies contain information that is transferred to your computer's hard drive. They help us to improve this website and to deliver a better and more personalised service. They enable us:

1. to estimate our audience size and usage pattern
2. to store information about your preferences, and so allow us to customise this website according to your individual interests
3. to speed up your searches
4. to recognise when you return to this website.

The below explains the cookies we use and why:

Cookie type: .NET

Cookie name: ASP.NET_SessionId_

Purpose: This cookie is essential for the online experience to remember selections and preferences and is set upon your arrival to the Site.

More information: [Visit the Microsoft website](#)

Cookie type: Google

Cookie name: __utma __utmz __utmc

Purpose: These cookies are used to collect information about how visitors use the website. We use the information to compile reports and to help us



improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.

More information: [Visit the Google website](#)

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set.

You can also learn more about cookies by visiting www.allaboutcookies.org which includes additional useful information on cookies and how to block cookies using different types of browser. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of this website.

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