

Rothesay



Privacy Notice

Who needs to read this privacy notice?

You should read this privacy notice if you are an individual with whom Rothesay Life Plc has a business or commercial relationship with.

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About us and our relationship with you

'Rothesay' is the trading name for Rothesay Life Plc, an insurance company established in the UK with company registration number 06127279 and ICO registration Z1003678. We are authorised in the UK by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Our registered office address is The Post Building, 100 Museum Street, London WC1A 1PB.

This Privacy Notice applies to all situations where we **process personal data** about any individual with whom we have a business or commercial relationship, for example if you are an employee, officer or representative of a supplier, client (such as a trustee or insurer), counterparty (such as a financial institution or reinsurer), shareholder or advisor, or you are simply just visiting our offices.

We are a **controller** under **data protection laws**. This privacy notice explains how we use and look after your **personal data**. This privacy notice also tells you about your privacy rights and how the law protects you.

About this document

This privacy notice contains information about:

- The **personal data** that we **process** as a **controller**.
- Where the **personal data** has been obtained.
- The reasons why we **process** your **personal data** and the lawful basis we use to do so.
- The security measures that we have in place to keep your **personal data** secure.
- The length of time we store your **personal data** for.
- The organisations, or categories of organisation, with whom we might share your **personal data**.
- International transfers of your **personal data**.
- The rights you have under **data protection laws** in relation to our **processing** of your **personal data**.

The meaning of words which are shown in **bold underlined** text are explained in the **Glossary**. Throughout this notice any reference to "we" or "us" refers to Rothesay Life Plc.

Please note that we may change this privacy notice from time to time. The latest version of our privacy notice can be found on our website:

> rothesay.com/data-protection

To request a printed copy of this privacy notice please contact us using the contact details contained in the part of this privacy notice headed **Contact details**.

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What personal data do we process?

The categories of **personal data** we **process** include the following:

1. **Business Contact Personal Information: Personal data** relating to individuals working for entities or businesses that have a past, existing or potential business or commercial relationship with us, including:
 - Name
 - Address (work email and postal)
 - Contact telephone number
 - Employer name
 - Job title, job location
 - Other personal data concerning your preferences relevant to our services
2. **Compliance Information: Personal data** relating to individuals which is **processed** to ensure we can comply with our legal and regulatory obligations. This includes:
 - Data provided by clients and counterparties to Rothesay for anti-money laundering (“**AML**”) or “Know-Your-Customer” (“**KYC**”) purposes
 - Results of **AML and KYC data**
3. **CCTV Information: Personal data** relating to individuals processed by the CCTV system operated within our offices.

Where the personal data has been obtained.

Personal data will usually be collected directly from you.

There will be instances where we collect **personal data** from other sources. We collect **personal data** from other sources to comply with regulations related to carrying out KYC and AML checks on individuals who work with us, our business partners, and our clients (such as trustees). This involves the use of financial sanctions screening companies and data from publicly available sources. If we are looking to do business with you, we may have obtained your contact details from a third-party recommendation or an external source.

The reasons why and lawful bases to process your personal data.

The table below provides details of the purpose and the lawful bases upon which we **process personal data**.

Type of personal data	Why do we need it?	Lawful bases for processing
<ul style="list-style-type: none"> • <u>Business Contact Personal Information</u> 	<p>Operating our business</p> <p>We <u>process personal data</u> to run our business, including:</p> <ul style="list-style-type: none"> • Seeking services that your organisation provides. • Fulfilling contractual obligations with the organisation you represent. • Internal record keeping. • Conducting vendor due diligence exercises. • Client event management. 	<p>Legitimate interests pursued by us or by a third party</p> <p>It is in our interest and the interest of the entities that we engage with to ensure our business can operate effectively.</p>
<ul style="list-style-type: none"> • <u>Business Contact Personal Information</u> • <u>Compliance Information</u> 	<p>Fulfilling our legal and regulatory obligations</p> <p>We <u>process personal data</u> to fulfil our obligations under applicable law and regulation. This includes:</p> <ul style="list-style-type: none"> • Financial checks on business partners and counterparties. • AML and KYC checks on individuals. 	<p>Compliance with a legal obligation to which we are subject</p> <p>We need to ensure that we run our business in accordance with laws and regulations.</p> <p>We process <u>sensitive personal data</u> under a substantial public interest condition, such as meeting regulatory requirements.</p>
<ul style="list-style-type: none"> • <u>Business Contact Personal Information</u> 	<p>Keeping you informed</p> <p>We <u>process personal data</u> to maintain our business relationships and to keep you informed of our business. This could include:</p> <ul style="list-style-type: none"> • Sending business communications. • Sending marketing communications. • Organising and holding events in connection with the 	<p>Legitimate interests pursued by us or by a third party</p> <p>It is in our interest and your interest to ensure we can maintain our strong business relationship and keep you informed of our business so we can collaborate more effectively.</p>

	promotion of our business.	
<ul style="list-style-type: none"> • <u>Business Contact</u> • <u>Personal Information</u> • <u>CCTV Information</u> 	Managing access to our premises and for security purposes	Legitimate interests pursued by us or by a third party We need to take steps to ensure the personal safety of our staff and visitors as well as protect our buildings and assets from intrusion, theft, vandalism, damage or disruption.

We may also process **personal data** including **sensitive personal data** to comply with other laws, regulations or criminal reporting requirements that we are subject to. This includes compliance with law enforcement agency procedures in connection with various investigations and compliance with any requirement to prevent or detect unlawful acts.

How do we keep your personal data secure?

Our commitment to corporate security is demonstrated through the implementation of policies, controls and procedures which are externally certified and audited to the international information security standard, ISO 27001:2013.

Our security policies, controls and procedures are regularly reviewed and updated so that we maintain good practices across our business to keep your information safe.

We have contractual arrangements in place with all of our service providers who **process personal data** in accordance with **data protection laws**. We regularly check that our service providers are complying with their contractual commitments. This includes assessing and reporting on our service providers' information security controls to check their compliance using questionnaires and/or on-site audits.

How long do we store your personal data?

We will only keep your **personal data** for so long as reasonably required and, in any event, only for as long as our internal rules and policies allow us in order to fulfil our business or legal and regulatory obligations. This will usually be six years from the conclusion of a relevant business relationship with you or a company you are associated with.

Who has access to your personal data?

We share **personal data** with a variety of other companies to operate our business. However, we only share the **personal data** where necessary to help us satisfy one or more of the reasons for processing set out above.

We have detailed the types of companies with whom we currently share **personal data** below. The companies fall into two categories:

- **Processors with whom we share personal data**

For these companies, we determine the purposes for which the **personal data** we pass to them is **processed** and they should not **process** that **personal data** other than in accordance with our written instructions. Processors with whom we share personal data:

- 1. Compliance screening companies**

We engage compliance screening companies to ensure that we do not break laws and regulations. This includes Credit Ratings Agencies, such as Moody's Investors Services Ltd.

- 2. IT service providers**

Our main IT infrastructure and core software is provided by Goldman Sachs Group, Inc.. This means that **personal data** we **process** is stored on Goldman Sachs' IT systems.

- 3. Other service providers to our business**

Other companies who **process personal data** on our behalf include those who provide day-to-day operational business services such as emails, archiving, document scanning and copying, document destruction and printing.

- **Controllers with whom we share personal data**

For these companies, we do not determine the purposes for which the **personal data** we pass to them is **processed** once it is shared. To understand how the other **controllers process** your **personal data**, you should refer to their privacy notices. Controllers with whom we share personal

data:

1. Event organisers and event venues

We will only pass on necessary **personal data** to event organisers or venues in circumstances where you have agreed to attend one of our events.

2. Managing entities for our offices

To ensure the security of our offices, you will be required to share ID with the company who manages our shared premises.

3. Professional advisers

We sometimes have to share **personal data** with our professional advisers (including accountants and lawyers) where it is required for the purposes of their advice.

4. Regulators, law enforcement and auditors

We will share **personal data** when requested by regulators, law enforcement agencies or other third parties to comply obligations imposed on us by laws and regulations.

International transfers of your personal data

Where personal data is transferred to and **processed** in a country outside of the UK or the EEA (as applicable), we take steps to provide appropriate safeguards to protect your **personal data**, including by entering into approved standard contractual clauses obliging recipients to protect your **personal data** and only transferring **personal data** to the extent that an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of **personal data** is ensured in compliance with **data protection laws**.

If you want further information on the specific mechanisms used by us when transferring your **personal data** outside of the UK or EEA, please contact us using the details contained in the part of this privacy notice headed **Contact details**.

Your rights

Under certain circumstances, you have the following rights under **data protection law**:

- The right of access to **personal data** relating to you (known as Subject Access Requests).
- The right to correct any mistakes in your **personal data**.
- The right to require us to delete your **personal data**.
- The right to restrict our **processing** of your **personal data**.
- The right to object to us **processing** your **personal data**, including for marketing purposes.
- The right to have your **personal data** provided to another **controller**.

How to exercise your rights

If you wish to exercise any of your rights, please contact us using the details contained in the part of this privacy notice headed **Contact details**.

Contact details

How to contact us regarding this privacy notice

You may want to contact us to:

- Ask any questions you have in relation to the information contained in this privacy notice.
- Exercise any of your rights under **data protection laws**.
- Request a printed copy of this privacy notice.
- Request a version of this privacy notice printed in large print or braille.
- Request an audio version of this privacy notice.
- Make a complaint (see below).

To contact us you can email our DPO at **dpo@rothesay.com** or write to:

> Data Protection Team, Rothesay Life Plc, The Post Building, 100 Museum Street, London WC1A 1PB

If you live within the European Union, you can also contact our European representative. Their details are as follows:

> Bird & Bird GDPR Representative Services SRL, Avenue Louise 235, 1050 Bruxelles, Belgium

Or email **EUrepresentative.Rothesay@twobirds.com**

How to make a complaint

If you have a problem or concern relating to the ways we process your **personal data** or the contents of this privacy notice, please contact us in the first instance.

We hope that we will be able to address the problem or concern to your satisfaction. However, you also have the right to make a complaint to the Information Commissioner's Office. The process for making a complaint to the Information Commissioner's Office is available here: <https://ico.org.uk/make-a-complaint/>. Their contact details are as follows:

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

Or phone 0303 123 1113

> **ico.org.uk**

Glossary

The terms shown in **bold underlined** text in this privacy notice have the meanings shown below.

AML and KYC data:

- Official documentation to verify identity (which may include photographic identification and signatures).
- Official documentation to verify address including bank statements or utility bills.
- Source of wealth and source of funds.
- Details for conducting Politically Exposed Person and Sanctions checks against relevant lists.
- Adverse media reports.
- Personal data relating to criminal convictions and offences or related security measures.
- Data setting out whether individuals are on any sanctions lists.

Business Contact Personal Information: Personal data relating to individuals working for entities or businesses that have a past, existing or potential business or commercial relationship with us, including:

- Name
- Address (work email and postal)
- Contact telephone number
- Employer name
- Job title, job location
- Other personal data concerning your preferences relevant to our services

Compliance Information: data relating to individuals which is processed to ensure we can comply with our legal and regulatory obligations:

- Data provided by clients and counterparties to Rothesay for AML/KYC purposes
- Results of **AML and KYC data**

CCTV Information: data relating to individuals processed by the CCTV system operated within our offices.

controller: the entity which determines the purposes for which, and the manner in which, any **personal data** is **processed**.

data protection laws: Any law relating to the use of Personal Data, including:

a) in the United Kingdom:

- i) the General Data Protection Regulation (EU) 2016/679 (GDPR) including as adopted by the United Kingdom as a result of its exit from the European Union ("UK GDPR") and the Data Protection Act 2018, and/or any corresponding or equivalent national laws and regulation in the United Kingdom and/or any other applicable jurisdiction; and/or
- ii) the Privacy and Electronic Communications (EC Directive) Regulations 2003, and any laws or regulations implementing Directive 2002/58/EC (e-Privacy Directive) and/or any corresponding or equivalent national laws and regulation;

b) in member states of the European Union (EU) and/or the EEA: the GDPR and the e-Privacy Directive, and all relevant EU and EEA member state laws or regulations giving effect to or corresponding with

any of them; and

c) any judicial or administrative interpretation of any of the above.

personal data: any information relating to a living identifiable individual, including:

- Information such as names, addresses, telephone numbers, email addresses, photographs, voice recordings and financial information
- Expressions of opinion and indications of intentions about individuals (and their own expressions of opinion/intentions)
- Information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future

processor: any entity which **processes personal data** on behalf of a **controller**.

processing, processed or **process**: this covers almost anything a company or individual can do with **personal data**, including:

- Obtaining, recording, retrieving, consulting, or holding it
- Organising, adapting, or updating it
- Disclosing, sharing, or otherwise making it available
- Cleansing, blocking, erasing, or destroying it.

Sensitive personal data: any information relating to any of the following:

- Racial or ethnic origin
- Political opinions
- Religious beliefs or beliefs of a similar nature
- Trade union membership
- Physical or mental health
- Sexual life or orientation
- Genetic data or biometric data for the purpose of uniquely identifying an individual.
- Personal data relating to criminal convictions and offences

Rothesay

'Rothesay' is the trading name for Rothesay Life Plc. Registered in England No. 6127279. Registered office: The Post Building, 100 Museum Street, London WC1A 1PB.

Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Firm Reference Number 466067.