

Rothesay



Privacy Notice

Who needs to read this privacy notice?

You should read this privacy notice if you are visiting our website.

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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 data about any individual as a result of that individual visiting or contacting us through our website.

We are a **controller** under **data protection law**. 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 and lawful bases used to **process** your **personal data**.
- 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. **Visitor information: personal data processed** when you visit our website and complete our web forms. Data may include the following:
 - Name
 - Email address
 - Telephone number
 - Additional information you provide.
2. **Website usage data: personal data processed** using cookies to improve your experience of our website and to ensure that it performs as you expect it to. This will usually be limited to your IP address. Please refer to our Cookie Policy published on our website for further details.

Where the personal data has been obtained.

Personal data will usually be collected directly from you when you interact with our website. This includes information relating to website usage which may be collected automatically when interacting with our website.

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>Visitor information</u> 	<p>To interact with you</p> <p>Our website allows us to provide you with information and allows you to contact us. The <u>personal data</u> you share allows us to respond to any queries you may have.</p>	<p>Legitimate interests pursued by us or by a third party</p> <p>We have a legitimate interest to collect and retain <u>personal data</u> so that we can record a query and effectively provide you with a response.</p>
<ul style="list-style-type: none"> • <u>Website usage data</u> 	<p>To allow our website to function</p> <p>We use cookies on our website to ensure our website can operate effectively and securely. These cookies will <u>process</u> limited amounts of <u>personal data</u>.</p>	<p>Legitimate interests pursued by us or by a third party</p> <p>We have a legitimate interest to <u>process personal data</u> using <u>strictly necessary cookies</u> to improve your user experience and secure the functionality of our website. Please note that the <u>personal data</u> that is <u>processed</u> will be limited in scope.</p>
<ul style="list-style-type: none"> • <u>Website usage data</u> 	<p>To improve your experience</p> <p>We use cookies on our website to help us to improve your experience of our website and to ensure that it performs as you expect it to. This includes limited tracking of your behaviour on the website to enable us to understand who is using our site to ensure we are reaching our target demographic and to improve and tailor our services. These cookies will <u>process</u> limited amounts of <u>personal data</u>.</p>	<p>You have given us your consent</p> <p>We use <u>performance cookies</u> and <u>targeting cookies</u> to improve your user experience, improve and tailor our services and secure the functionality of our website. We will only <u>process</u> your <u>personal data</u> using such cookies when you have given us your consent to do so.</p>

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 no longer than 2 years after the data has been captured.

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.

- **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. **IT service providers**

Our main IT infrastructure and core software for our website is provided by Microsoft. This means that the **personal data** we **process** is stored on Microsoft's IT systems.

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.

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) Data Protection, Privacy and Electronic Communications (Amendments) (EU Exit) Regulations 2019, and/or any corresponding or equivalent national laws and regulation; and/or
- iii) 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.

performance cookies are cookies that collect information about how visitors to a website use that website. These cookies collect information such as the number of visitors to a website, how visitors arrive there (e.g., directly from the internet or through linking from another website) and tracking which webpages they visit.

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.

strictly necessary cookies are cookies on our website that are essential to enable you to move around our website and use its features.

targeting cookies are cookies used to track your behaviour on the website. This enables us to better understand who is using our site to ensure we are reaching our target demographic and to improve and tailor our services accordingly.

Visitor information: is **personal data** that is **processed** when you visit our website and complete our web forms. **Personal data** may include:

- Your name
- Your email address
- Your telephone number
- Any additional information you provide.

Website usage data: **personal data processed** using cookies to improve your experience of a website and to ensure that it performs as you expect it to. This will usually be limited to your IP address.

Rothestay

'Rothestay' is the trading name for Rothestay 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.