

Rothesay



Privacy Notice

Understanding the terms used in this privacy notice

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.

About us

'Rothesay' is the trading name for Rothesay Life Plc, an insurance company established in the UK with company registration number 06127279. 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 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), counterparties such as (financial institutions or reinsurer), shareholder, advisor or simply just visiting our offices.

We are a **controller** under **data protection law**. This means that we are trusted to look after and deal with your personal information in accordance with this notice. We determine the ways and means of processing your data and must therefore, be accountable for it.

We are required to provide you with the information in this privacy notice in order to comply with our legal obligations as a **controller**. Please read it carefully – we take the privacy of your **personal data** very seriously..

About this document

This privacy notice contains information about:

- The **personal data** that we **process** as a **controller**
- The reasons why and legal grounds upon which we **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 with whom we might share your **personal data**
- The rights you have under the **data protection laws** in relation to our **processing** of your **personal data**

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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**. You can also find these contact details at:

> rothesay.com/contact

We will notify you if the purposes for which we **process** your **personal data** change.

What personal data do we process?

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

1. Personal information 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
- CCTV images
- data provided by clients and counterparties to Rothesay for AML/KYC purposes
- Results of AML/KYC checks
- Other personal data concerning your preferences relevant to our services.

2. **Sensitive personal data** the extent strictly necessary to fulfilled our legal obligations.

Whilst we aim to collect the personal information directly from individuals whose data we hold, we do acquire some Personal Information indirectly. For example, to comply with regulations, we carry out KYC and AML checks on individuals who work with our business partners and clients such as trustees. This involves the use of financial sanctions screening companies and data from publicly available sources. Likewise, if we are looking to do business with you, we may have obtained your contact details from a recommendation or an external source.

Legal grounds for processing your personal data

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

Purpose	Legal grounds for processing
<p>1. Operating our business</p> <p>We process personal data in order to run our business, this could include:</p> <ul style="list-style-type: none">• Fulfilling the contractual obligations with the organisation you represent• Seeking services that your organisation provides• Internal record keeping• Manage access to our premises and for security purposes• Managing risks to our business.	<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.</p>
<p>2. Fulfilling our legal and regulatory obligations</p> <p>We process personal data in order to fulfil obligations imposed upon us by 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>Under the UK Data Protection Act 2018, we process Sensitive Personal Data Schedule 1, part 2, 12. Regulatory requirements relating to unlawful acts and dishonesty etc.</p>
<p>3. Keeping you informed</p> <p>We process personal data in order to maintain our business relationship 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 promotion of our business	<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> <p>We always provide a mechanism for you to unsubscribe from marketing communications.</p>

Separate legal grounds apply to the **processing** of **sensitive personal data**.

We will only **process sensitive personal data** to comply with obligations under laws and regulations and any 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?

We take the security of information, infrastructure and applications very seriously. 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. In addition, we are certified to Cyber Essentials, a government-backed scheme demonstrating cyber security.

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** which are compliant 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 we reasonably required and, in any event, only for as long as our internal rules and polices allow us to fulfil our business or legal and regulatory obligations.

Who has access to your personal data?

We share **personal data** with a variety of other companies in order to operate our business. However, we only share the **personal data** that those companies need to provide their services to us.

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.

- **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**. To understand how the other **controllers process** your **personal data**, you should refer to their privacy notices.

Processors with whom we share personal data

1. IT service providers

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

2. 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, marketing and events management, archiving, document scanning and copying, document destruction and printing.

3. Compliance screening companies

We engage compliance screening companies to ensure that we do not break laws and regulations.

Controllers with whom we share personal data

1. Event organiser and venues

We will only pass the necessary **personal data** to event organisers or venues when 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.

Transfer of personal data outside the UK

Personal data may be transferred outside of the UK from time to time to business partners of the Rothesay group, trusted service providers and other third parties. We will ensure that any such transfer is made in compliance with laws and regulations and suitable protection is maintained at all times by ensuring that appropriate safeguards are in place.

Your rights

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

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

When seeking to exercise any of your rights, please ensure that your request contains sufficient information and supporting documentation to enable us to consider your request and take appropriate action.

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 the **data protection laws**
- 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 us 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 matters set out in this privacy notice that you would like us to look into, 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, as applicable to the Parties, 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.

GDPR: the General Data Protection Regulation (EU) 2016/679 as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (the "GDPR"), and the Data Protection Act 2018 and any other national legislation that relates to data protection and privacy, and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

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 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

Rothesay Group: Rothesay and all other companies whose ultimate parent company is Rothesay Limited (Registered number: 08668809). Details of the companies in the **Rothesay Group** are provided here:

> rothesay.com/rothesay-group

sensitive personal data:

- **Special category personal data**
- Data relating to criminal convictions

Special category 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

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.