

Rothesay



Privacy Notice

# Who needs to read this privacy notice

You should read this privacy notice if you are an individual who is:

- One of our individual policyholders
- Receiving benefits as a result of the death of a policyholder
- Potentially entitled to benefits following the death of one of our policyholders
- Instructed to act on behalf of one of our individual policyholders under a power of attorney

## Understanding the terms used in this privacy notice

The meaning of words which are shown in **green bold** 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.

We offer a range of insurance products to pension schemes and pension scheme members including bulk purchase annuity products and individual pension annuity policies.

We are a **controller** under **data protection laws**. This means we have a legal responsibility to ensure that we, and other companies with whom we share your **personal data**, **process** your **personal data** securely and lawfully in accordance with the **data protection laws**.

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 we **process** your **personal data**
- The 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](https://rothesay.com/data-protection)

To request a printed copy of this privacy notice please contact us using the contact details on any of the letters we have sent to you. You can also find these contact details at:

> [rothesay.com/contact](https://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 each of our **policyholders**, including:
  - Name
  - Address (email and postal)
  - Bank details
  - National Insurance number
  - Tax code
  - Date of birth
  - Gender
  - Marital status, dependants and next of kin
  - Retirement age
  - Retirement date
2. The identity of any individual that a **policyholder** would like us to consider as a potential recipient of any lump sum benefit payable upon the **policyholder's** death. Where this information is provided by a **policyholder** (for example, in an expression of wishes form), it is given to us in the strictest of confidence as it can be a sensitive matter for a **policyholder** to discuss their nominations during their lifetime.
3. Information relating to the **policyholder's** employment relevant to the benefits payable to each individual insured under an **individual policy**, including:
  - Employer (or former employer) name
  - Job title, job codes and job location
  - Pension benefits
4. Personal information relating to each individual insured under an **individual policy** to whom we are obliged to pay, or are paying, benefits following the death of a **policyholder**, including:
  - (a) Name
  - (b) Address (email and postal)
  - (c) Bank details
  - (d) National Insurance number
  - (e) Tax code
  - (f) Date of birth
  - (g) Gender
  - (h) Relationship to the **policyholder**
5. Health information (and any other **sensitive personal data** that might be provided by a registered medical practitioner) relating to an individual insured under an **individual policy**, to the extent strictly necessary to determine eligibility for any ill-health benefits.
6. Information relating to any individual entitled to instruct us on behalf of an individual insured under an **individual policy** (for example, an attorney acting under a valid power of attorney), including that individual's name, address (email and postal) and other contact details.

Most of the personal data described on the previous page is obtained from the trustees of the pension scheme who purchased the individual policy, the policyholder or any other individual to whom the personal data relates. If an individual policy has transferred to us from another insurer, personal data will also be provided to us by that other insurer. The personal data described on the previous page is not an exhaustive list as the actual personal data that we hold will depend upon the information that is provided to us in connection with the individual policy.

We might also obtain personal data about individuals insured under an individual policy from the following third parties:

#### **1. Tracing agencies and mortality screening companies**

We engage tracing agencies to check whether we hold the correct address for an individual insured under an **individual policy**.

We engage mortality screening companies to check whether an individual insured under an **individual policy** is alive.

#### **2. Financial sanctions screening companies**

We engage financial sanctions screening companies to ensure that we do not break laws and regulations by making a payment in respect of an individual who:

- appears on a list of financial sanctions targets; or
- is subject to a sanctions programme as determined by any government or law enforcement agency

The purposes for which we process your personal data are described in the following section of this privacy notice (**Why do we process your personal data?**).

# Why do we process your personal data?

We **process personal data** as **controller** for the purposes listed below.

## 1. Administering our individual policies

We need to **process personal data** in order to fulfil our contractual obligations under our **individual policies**. This involves sharing **personal data** with our sub-contractors, service providers and professional advisers.

The third parties with whom we might share **personal data** (and the circumstances in which we would share it) are described in the following sections of this privacy notice:

- **What personal data do we process?**
- **Who has access to your personal data?**

## 2. Managing our risks that are associated with our individual policies

We **process personal data** in order to manage the risks to our business that are associated with our **individual policies**. In particular, we provide information about the liabilities under our **individual policies** to third party insurance companies who reinsure some of the risks associated with those liabilities under the contractual agreements that they have in place with us. We need to provide **personal data** to reinsurers so that both we and the reinsurers can comply with our respective obligations under those contractual agreements.

None of the steps we take to manage our risks will affect our obligations under our **individual policies**.

## 3. Fulfilling our legal and regulatory obligations

We **process personal data** in order to comply with obligations imposed upon us by laws and regulations, many of which apply to us because we are an insurance company that is authorised by the Prudential Regulatory Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

In particular, those regulatory authorities and law enforcement agencies might require us to share **personal data** with them.

## 4. Operating our business

We **process personal data** by providing it to third parties who collate such data from a wide variety of sources and publish reports on how long people in the UK live and other demographic trends. We use these reports in connection with the performance of our business, for example, by using them to help us understand our liabilities in respect of individuals insured under our **individual policies**. The reports do not impact upon the scope of our payment obligations under our **individual policies**.

If we decide to transfer/sell certain business or assets, we will disclose **personal data** to the prospective buyer of such business or assets.

## **5. Providing information about additional services**

We **process personal data** in order to send information about similar additional services that we offer to individuals insured under our **individual policies**.

We also **process personal data** by sharing it with other companies in the **Rothesay Group** so that they can send information about similar additional services that we offer to individuals insured under our **individual policies**.

If at any time you no longer wish to receive information from us and/or other companies in the **Rothesay Group** about the additional services we offer (and/or if you wish to change the format in which you receive this information), please contact us using the details contained in the part of this privacy notice headed **Contact details**. Alternatively, you can click the 'unsubscribe' link in any email that you receive.

## **6. Storing personal data to exercise our legal rights and defend ourselves against potential legal claims**

We store **personal data** in case we need it to exercise our legal rights, and to defend ourselves against potential legal claims that might be brought against us under the terms of any of our **individual policies** and/or laws and regulations.

## **7. Monitoring and recording communications to enable us to respond to queries or complaints and for quality control purposes**

We **process personal data** to enable us to deal with any queries or complaints that an individual might have in relation to an **individual policy**.

In particular, we (and our third party administrators) monitor and record communications with individuals who contact us (or our third party administrators) in connection with an **individual policy**. These records could contain **personal data** and are stored for future reference and are also used for internal quality control checks and training purposes.



## Legal grounds for processing your personal data

We are allowed to **process** your **personal data** on certain legal grounds.

The table below provides details of the legal grounds upon which we **process personal data** for each of the purposes detailed in the section of this privacy notice headed **Why do we process your personal data?**.

Please be assured that, in respect of all **processing** of **personal data** that we or our third parties carry out, we have robust technical, security and organisational measures in place to ensure that the risk of a privacy breach by us, or one of the third parties with whom we share **personal data**, is low.

### Purpose

### Legal grounds for processing

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#### 1. Administering our individual policies

We **process personal data** in order to fulfil our contractual obligations under our **individual policies** and ensure that we are paying the right amounts under those **individual policies**.

#### Performance of a contract with the policyholder

An **individual policy** is a contract between us and the **policyholder**. It is necessary to process personal data in order to fulfil our contractual obligations and ensure that we are paying the right amounts under the **individual policy**.

#### Legitimate interests pursued by us or by a third party

Individuals other than the **policyholder** might be entitled to benefits under an **individual policy** following the **policyholder's** death. It is in our interest and the interest of any such individual to ensure that we fulfil our contractual obligations and ensure that we are paying the right amounts under the **individual policy**.

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#### 2. Managing our risks

We **process personal data** in order to manage the risks to our business that are associated with our **individual policies**.

#### Legitimate interests pursued by us or by a third party

It is in our interest to manage the risks to our business associated with our **individual policies** – we need to do this in order to operate our business. These risks include the risk:

- of making payments in breach of laws and regulations
- that **policyholders** and other individuals entitled to benefits under an **individual policy** live for longer than we had assumed

Our risk mitigation measures do not impact upon our payment obligations under our **individual policies**.

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## Purpose

## Legal grounds for processing

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### 3. Fulfilling our legal and regulatory obligations

We **process personal data** in order to fulfil obligations imposed upon us by applicable law and regulation.

### Compliance with a legal obligation to which we are subject

We need to ensure that we run our business in accordance with laws and regulations.

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### 4. Operating our business

We **process personal data** by providing it to third parties who collate such data from a wide variety of sources and publish reports on how long people in the UK live and other demographic trends. We use this information in connection with the performance of our business.

We may choose to transfer/sell **individual policies** to another insurer to support our business objectives.

### Legitimate interests pursued by us or by a third party

It is in our interest to estimate how long people in the UK are likely to live as accurately as possible and to understand other demographic trends. This helps us to understand our liabilities in respect of our current and future **policyholders**. The reports we receive do not impact upon the scope of our payment obligations under our **individual policies**.

It is in our interest to be able to transfer **individual policies** to another insurer so we can operate our business effectively. Any transfer will not affect the terms and conditions of the transferring **individual policies**.

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### 5. Providing information about additional services

We **process personal data** in order to send information to individuals insured under our **individual policies** about similar additional services that we offer.

We also **process personal data** by sharing it with other companies in the **Rothesay Group** so that they can send information to individuals insured under our **individual policies** about similar additional services that we offer.

### Legitimate interests pursued by us or by a third party

It is in our interest and the interest of other companies in the **Rothesay Group** to be able to send information to individuals insured under our **individual policies** about additional services that we offer that might be of interest to them.

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### 6. Establishment, exercise or defence of legal claims

We store **personal data** in case we need it to exercise our legal rights, and to defend ourselves against potential legal claims that might be brought against us under the terms of any of our individual policies and/or laws and regulations.

### Legitimate interests pursued by us or by a third party

It is in our interest to ensure that we are able to exercise our legal rights and defend ourselves against potential legal claims.

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## Purpose

## Legal grounds for processing

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### 7. Monitoring and recording communications to enable us to respond to queries or complaints and for quality control purposes

We process **personal data** to enable us to deal with any queries or complaints relating to an **individual policy**.

In particular, we monitor and record communications with individuals who contact us in connection with an **individual policy**. These records are stored for future reference and are also used for internal quality control checks and training purposes.

### Legitimate interests pursued by us or by a third party

It is in our interest and the interest of individuals insured under one of our **individual policies** to ensure that we (and our third party administrators on our behalf) can respond quickly and accurately to any queries or complaints relating to that **individual policy** so that we can ensure that we are paying the right amounts under the **individual policy**.

It is also in our interest and the interest of individuals insured under one of our **individual policies** to ensure that we (and our third party administrators) are providing, and continue to provide, a high level of service when administering our **individual policies**.

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You can object to **processing** that we carry out on the grounds of legitimate interests. See the section headed **Your rights** to find out how.

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

We will only **process sensitive personal data** where you have given your explicit consent to this for the purposes described in this privacy notice, or where the **processing** is necessary for one of the following reasons:

- The establishment, exercise or defence of legal claims
- 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
- To protect your vital interests if you are physically or legally incapable of giving your consent to the **processing**

## 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 keep your **personal data** for so long as is required to operate our business or fulfil our 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 and administer our **individual policies**. 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. Third Party Administrators

We use specialist third party pension administration companies to help us administer the benefits insured under our **individual policies**. This enables us to meet our obligations in accordance with the terms of those **individual policies**. To enable them to do this, we need to provide them with all **personal data** that is relevant for this purpose.

Currently, we engage as administrators, companies trading as:

- Capita Employee Solutions
- Mercer
- Willis Towers Watson

### 2. Professional advisers

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

### 3. 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.

### 4. Tracing agencies, mortality screening companies and financial sanctions screening companies

We use these companies in order to check one or both of the following:

- Whether a **policyholder** or an individual to whom we are paying benefits under an **individual policy** is alive and that the individual's address remains current
- Whether an individual appears on a list of financial sanctions targets or is subject to a sanction programme

The section headed **What personal data do we process?** contains further detail.

### 5. 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 archiving, document scanning and copying, document destruction and printing.

## Controllers with whom we share personal data

### 1. Reinsurers

We provide information about the liabilities insured under our **individual policies** to reinsurers with whom we reinsure some of the risks to which we are exposed under those **individual policies**. The main such risk is that individuals whose benefits we insure live longer than we anticipated.

### 2. Trend analysis providers

We provide information to, and use services provided by, third parties to analyse how long people in the UK live and other demographic trends. We use information provided to us by these third parties in connection with the performance of our business. For example, we use it to help us to estimate how long individuals insured under our **individual policies** are likely to live in order to understand our liabilities in respect of individuals insured under our **individual policies**.

### 3. Other third parties

If we decide to transfer/sell certain business or assets, we will disclose relevant **personal data** to the prospective buyer of such business or assets. If we, or substantially all of our business and assets, are acquired by a third party, **personal data** held by us about our policyholders will be one of the transferred assets. If we acquire policies from another insurer and that insurer administers the policies on our behalf for a period of time, then during that period Rothesay and the other insurer will both be **controllers** of the data.

## Your rights

You have the following rights under **data protection laws**:

- The right to object to us **processing** your **personal data**
- 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**
- Rights in relation to automated decision-making (not relevant here)

These rights are described in the following section **Your rights in more detail**.

### **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.

There are exemptions that apply to some of your rights. If any of these are applicable such that we are unable to comply with your request to exercise any of your rights, we will confirm this to you when responding to your request and apply those exemptions in accordance with **data protection laws**.

### **What will happen if your rights are breached?**

You might be entitled to compensation for any damage caused by contravention of **data protection laws**.

## Your rights in more detail

### **Your right to object to us processing your personal data**

You may object to us **processing** your **personal data** where we rely on a legitimate interest as our legal grounds for **processing**. The section headed **Legal grounds for processing your personal data** explains where this is the case.

If you object to us **processing** your **personal data** we will no longer be able to **process** your **personal data** unless we can demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in the section headed **Legal grounds for processing your personal data**. However, the key point to note is that, if you are insured under an **individual policy** and we cannot continue to **process** your **personal data**, we would be unable to provide the benefits due under the **individual policy**.

One exception to the position described above is where you object to us (or other companies in the **Rothesay Group**) **processing** your **personal data** for the purposes of providing you with information about additional services. If you object to **processing** of your **personal data** for this purpose we (or other companies in the **Rothesay Group**) will stop providing you with information about additional services as you requested.

### **Your right to correct any mistakes in your personal data**

You can require us to correct any mistakes (including adding missing information) in any of your **personal data** which we hold.

### **Your right to restrict our processing of your personal data**

You may request that we restrict the **processing** of your **personal data** in any of the following circumstances:

- Where you do not think that your **personal data** is accurate. In this case we will start **processing** again once we have checked the accuracy of your **personal data** and it has been corrected if necessary
- Where the **processing** is unlawful, but you do not want us to erase your **personal data**
- Where we no longer need the **personal data** for the purposes of our **processing**, but you need the data to establish, exercise or defend legal claims
- Where you have objected to **processing** because you believe that your interests should override our legitimate interests. In this case we will start **processing** again once we have checked whether or not our legitimate interests override your interests

If our **processing** is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

### **Your right to access your personal data (Subject Access Request)**

You can ask us to confirm whether we are **processing personal data** relating to you. If we do, you may ask us to provide the following:

- A copy of your **personal data** (please note that, if you want more than one copy of your **personal data**, we reserve the right to charge a reasonable fee based on our administrative costs for the provision of such further copies)
- Details of the purpose for which your **personal data** is being, or is to be, **processed**
- Details of the recipients or classes of recipients to whom your **personal data** is, or might be, disclosed, including, if the recipient is based in a country outside of the European Union, what protections are in place in relation to the transfer to that recipient
- The period for which your **personal data** is held (or the criteria we use to determine how long it is held)
- Any information available about where we obtained your **personal data** from
- Confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling

### **Your right to require us to delete your personal data**

You can ask us to delete your **personal data** in any of the following circumstances:

- You believe that we no longer need to **process** it for the purposes set out in this privacy notice
- You had given us consent to **process** it, but you withdraw that consent and there are no other legal grounds upon which we can **process** it
- You have successfully objected to our **processing** it
- It has been **processed** unlawfully or has not been erased when it should have been

### **Your right to have your personal data provided to another controller**

You can ask a **controller** to provide you with an electronic copy of **personal data** about you that you have provided to the **controller**, or to transmit such a copy directly to another **controller**, where the **controller processes** your **personal data** by automatic means and on the legal ground of performance of a contract.

## **Your rights in relation to automated decision-making**

You have the right to ask a **controller** to review manually any automated decisions the controller makes about you. However, please note that we do not carry out decision-making by automated means in connection with your **individual policies**.

## Contact details

Please use the contact details on any of the letters we have sent to you for any queries related to your pension benefits. You can also find the contact details to use at:

> **[rothesay.com/contact](https://rothesay.com/contact)**

### **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](mailto: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](mailto: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, if you remain unsatisfied you will 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 can be found on its website. 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](https://ico.org.uk)**



## Glossary

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

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

**data protection laws**: the **GDPR** and any other data protection or privacy laws, regulations and provisions which apply in the UK from time to time

**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

**individual policy**: a pension annuity policy (issued by us or by another insurer who has transferred that policy to us) which documents the benefits payable by Rothesay to a **policyholder** and to any person entitled to benefits following the death of that **policyholder** (if applicable)

**personal data**: any information from which a living individual can be identified, 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

**policyholder**: an individual who has received notification from Rothesay confirming that we have assumed a direct obligation to provide benefits to that individual and who has been issued with an **individual policy** in their own name (either by us or by another insurer who has transferred that **individual policy** to us) or confirmed that we will issue an **individual policy** in due course

**processor**: any person or service provider who **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](https://rothesay.com/rothesay-group)

**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

# 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.