



ROYAL LONDON EQUITY RELEASE PRIVACY NOTICE

1. Who we are

This privacy notice tells you how Royal London Marketing Limited will use your personal information when you make an enquiry for an Equity Release product provided through Responsible Life. Royal London Marketing Limited is part of the Royal London Group of companies. Its parent company is the Royal London Mutual Insurance Society Limited. Where we refer to 'we', 'us' and 'our' we are referring to Royal London Marketing Limited ('Royal London').

For details of how Responsible Life Limited use your personal information please refer to the Responsible Life privacy policy at <https://www.responsiblelife.co.uk/privacy-policy/>

Both Responsible Life and Royal London will collect, or facilitate the collection of, your personal information which they will then share with one another. Royal London will also share with Responsible Life the personal information which it receives and holds about you.

This section is a notice which we are required to give you under the data protection laws. It tells you how Royal London will use your personal information. We may update this notice from time to time and we will alert you to any important updates. It is not meant to be a legal contract between you and Royal London, and this does not affect your rights under the data protection laws.

2. What kinds of personal information do we hold about you?

When we collect your personal information, we'll let you know if any of it is optional. If it is, we'll explain why it would be useful to us, and you can decide whether it's something you're happy for us to have.

We collect and process the following information about you:

- **Information about you** - such as your name, age, gender, date of birth, which is needed to help answer your enquiry.
- **Contact information** – for example, your address, postcode, email address and phone numbers.
- **Financial information** – for example your property and mortgage values.
- **Online information** – for example [Cookies](#) and IP address (your computer's internet address), if you use our websites.

- **Telephone calls or video recordings** – for example voice recording when you contact us complete a survey at the end of a call to our Customer Services Team or CCTV footage if you visit our offices.

3. How we use your personal information?

We use the information we obtain directly from you, for a number of reasons:

- Answering your enquiry about our products and services and sending you information relating to the later life lending service provided by Responsible Life.
- Researching our customers' opinions and exploring new ways to enhance the servicing experience we provide to meet our customers' needs.
- Assessing, developing and managing our products, systems, prices, our business and brand.
- Fulfilling any other legal or regulatory obligations.
- Telephone calls may be recorded to allow you to give us instructions by phone, to analyse, assess and improve our customer service, for training and quality purposes, to manage complaints and to protect you and your information from fraud and financial crime.
- Profiling as we may make an assumption on you (please refer to section 10 and 11 for further information).
- Sending you marketing information by post, or where you have provided permission to be contacted by email, text and other electronic means – you can easily change your mind and “opt out” of receiving marketing information by emailing us: GDPR@Royallondon.com or ringing us on 0345 602 1885. We also use your information to create “lookalike audiences” to help us target campaigns to new people who are similar to our best customers.
- Monitoring the use of our websites – for further information please see our [Cookies Policy](#).

4. Where do we get your information from?

Most of the information we get comes directly from you when you make an enquiry about later life lending services provided by Responsible Life. We may also, where necessary, obtain personal information about you from other sources.

- Responsible Life - will facilitate the collection of information to answer your enquiry.
- ‘Third party’ cookies - to collect information on how visitors use our website. Our [Cookies Policy](#) can give you more information.

5. Who do we share your personal information with?

As you'd expect, our employees will access your records in order to use your information for the purposes mentioned above. However, only those employees who need access to particular information are given it. For example, our customer service staff need access to your policy details to support you when you get in

contact and our research team will need access to a subset of your information to perform their analysis. We regularly check who has access to our systems.

We may also share your personal information with these third parties:

- Responsible Life, our later life lending partner
- Our service providers, e.g. mailing houses for printing, market research agencies, offsite storage, confidential waste disposal companies and approved IT specialists who support our technology.
- Our professional advisers: auditors; medical professionals, legal advisers.
- Your Financial Advisor, if you have appointed one.
- Legal and Regulatory bodies e.g. The HM Revenue & Customs, the Courts of the UK, regulators such as the Financial Conduct Authority, Information Commissioner's Office, Financial Ombudsman Service and the UK Financial Services Compensation Scheme
- Companies within the Royal London Group.
- Companies you ask us to share your information with.
- In addition, in the event Royal London was to merge or sell any part of its business or assets, it will be necessary to pass your personal information to the prospective buyer/party.

6. What are our legal grounds for using your personal information?

The General Data Protection Regulation gives organisations a number of different conditions under which your information may be processed lawfully.

We'll only use your personal information when one of these conditions has been satisfied. Below you can see how we use your information and the legal grounds for processing this:

Legal Grounds	Uses of your information
Consent Your personal information may be processed when we receive your consent. The consent you provide must be freely given, informed, specific, unambiguous and given with a positive affirmative action.	Cookies On our website we use 'third party' cookies that collect information about how visitors use our website. Please see our Cookies Policy for further information.

Your consent can be withdrawn at any time.	
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Necessary for the performance of a contract The personal information you provide or that of a joint party to the contract may be processed when it is necessary in order to enter into or perform a contract. E.g. where we process your information to assess your application, calculate your premium or to provide your policy.	Answering your enquiry Answering your enquiry about later life lending services and sending you information relating to this.
Necessary for compliance with a legal obligation Your Personal information may be processed where Royal London has a legal obligation to perform such processing.	We use your personal information, where necessary, to comply with legal obligations including: <ul style="list-style-type: none"> • Complying with the requirements of Legal and Regulatory bodies e.g. The HM Revenue and Customs, The Financial Conduct Authority, Information Commissioner's Office and the Financial Ombudsman Service. • Keeping proper books and records and risk management governance to ensure the company stays financially sound. • Carrying out internal reporting, quality checking, compliance controls and audits to help meet these obligations. • Complying with court orders
Necessary to protect vital interests This will usually only apply in "life-or-death" scenarios	We may disclose your information to the police or other authorities if we have serious concerns about your wellbeing.
Necessary to provide legal advice and legal	In certain cases, and where necessary, the personal data

proceedings The 2018 Data Protection Act provides legal grounds for processing special category data for legal advice and legal proceedings.	provided may be processed for the following purposes: <ul style="list-style-type: none">• to defend legal and prospective claims,• to pursue legal proceedings or prospective legal proceedings, or• for the purposes of establishing, exercising or defending legal rights.
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Necessary for **legitimate interests**

We also use your information when we have a “legitimate interest” and that interest isn’t outweighed by your privacy rights. Each activity is assessed, and your rights and freedoms are taken into account to ensure that we’re not being intrusive or doing anything beyond your reasonable expectation. We’ll assess the information we need, so we only use the minimum.

If you want further information about processing under legitimate interests, you can contact us using the details below.

You also have the right to object to any processing done under legitimate interests. We’ll re-assess the balance between our interests and yours, considering your particular circumstances. If we have a compelling reason, we may still continue to use your information.

We use legitimate interests for the following:

Use of your information	Legitimate interest(s)
To assess and develop our products, systems, prices, business and brand Our products are developed with a particular set of customer needs in mind. In order to make sure our services are still suitable for you and are working as we intended, we combine your information with other customers to analyse and segment it.	We need to be able to identify groups of customers who will want new products or services that we are considering developing. We need to develop those products and services, and make sure our product charges are fair. We need to make sure we are treating you fairly and check your product is suitable for you.

<p>To manage our business:</p> <ul style="list-style-type: none"> • We financially assess the performance of our business, we conduct risk management exercises and we carry out long-term statistical modelling. • We manage our network and information security (for example: developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions.) • We also use CCTV at our premises. • We share your information with Royal London Group, Responsible Life and our service providers. 	<ul style="list-style-type: none"> • To improve our service quality and for training purposes. • To help us understand our risks, provide management information and help us to manage our business. • To ensure that our systems are always secure and that your data is always protected. • To protect our staff and visitors for health and safety reasons and security purposes. • for internal administrative, audit, statistical, or research purposes. Where possible, we will make your data anonymous. Your data will only be transmitted within the Group, Responsible Life and to our service providers when appropriate safeguards, including contractual provisions, are in place.
<p>To research our customers' opinions and new ways to meet our customers' needs</p> <p>We may conduct research before we launch new products or before we make changes or improvements to existing products to make sure it's the right thing to do. We might also conduct research to ask customers what they think of Royal London, our product and services provided by us and other companies that we partner with.</p>	<p>We need to make sure our products and services are suitable for the intended audience and to identify gaps in the market.</p> <p>We need to see how many categories of customers we have and to tailor our products and services accordingly.</p> <p>We need to make sure our communications are easy to understand and that our products and services are being sold to the correct audience.</p> <p>We need to make sure our research is efficient and connects with the right types of people, so we can be confident of any decisions we make based on the results.</p>

<p>Sending you marketing communications about our products and services</p> <p>To send you information relating to your products and other products you may be interested in. We won't do this if you have told us not to.</p> <p>We may analyse your personal information to create a profile so that we can contact you with information relevant to you.</p>	<p>We need to ensure our communications are in line with Royal London's values.</p> <p>We also need to grow and sustain our business, develop our brand and effectively communicate with our policyholders.</p> <p>Where appropriate, we also use consent as a legal basis to contact you, if you have given us permission to do so.</p>

7. Overseas Transfers

We will not process your information outside the EEA to provide these services.

8. Security

We use Transport Layer Security (TLS) to encrypt and protect email traffic. We also use the Clearswift Managed Email Security Service to protect our outgoing email traffic. However, if your email service doesn't support TLS or if you do not wish to use our Clearswift Managed Email Security Service, we may not be able to communicate with you by email, and any emails we do send or receive will not be protected by encryption. We recommend you don't send anything confidential to us by email. We may also change our Email Security Service provider at any time without notice and without changing the provision in this notice.

Once we receive your information, we use strict procedures and security features to protect your information from unauthorised access.

In the event of a potential data security breach we will notify you and the Data Protection Commissioner's Office if we are legally required to do so, or there is a risk to your rights and freedoms as a result of the breach.

9. How long do we keep personal information for?

We will retain your personal information for as long as it is considered necessary for the purpose for which it was collected, and to comply with our legal and regulatory requirements. This will involve retaining your information for a reasonable period of time after your policy or your relationship with us has ended.

We may retain your information for analysis purposes so we can develop our business and also for marketing purposes, if you have not opted out of receiving these communications.

10. Do we make solely automated decisions about you or profile you?

Automated Decisions

Automated decisions are where a computer makes a decision about you without a person being involved. We also profile our customers, which means we make assumptions about you to help us treat you fairly.

Socio economic profiling

We may analyse your personal information to create a profile so that we can contact you with information relevant to you. When building a profile, we use Experian software, to provide us with insight into our customers. The software uses a variety of publicly available and market research sources to divide the population into a series of categories. The categories are a way of grouping people who are likely to have similar social, demographic (i.e. age, location) and financial circumstances. The results are assessed and combined so we get a picture of our customers as a whole, and tailor the products and services we provide. Please see section 11 "What are my rights" for further information.

In the future we'd like to keep a note of the category you fall into, against your records, so we can tailor our communications to suit you. Before we do this, we'll assess if this is fair.

11. What are my rights?

Your rights are outlined below. The easiest way to exercise any of your rights would be to contact our Data Protection Officer at the contact details provided. We will provide a response within 30 days, if not sooner. There is normally no charge for exercising any of your rights.

Access to your personal information

You have the right to find out what personal information we hold about you, in many circumstances. Please see section 15 below for our contact details.

Correcting or adding to your personal information

If any of your details are incorrect, inaccurate or incomplete you can ask us to correct them or to add information.

Withdrawing your consent

If you have provided consent for us to use your information you have the right to withdraw your consent at any time and we used consent to process your personal information. If you withdraw consent, then we are not allowed to use your information going forward.

However, it would not invalidate processing that was carried out before you withdrew consent.

Withdrawal of consent may impact the product and services we can provide to you. In this event, we will let you know what the impact would be.

Transferring your personal information to another organisation (Data portability)

In some circumstances you can ask us to send an electronic copy of the personal information you have provided to us, either to you or to another organisation.

Objecting to the use of your personal information for legitimate interests

You also have the right to object to any processing done under legitimate interests. We will re-assess the balance between our interests and yours, considering your particular circumstances. If we have a compelling reason, we may still continue to use your information. However, we will inform you of that decision and reasoning for continuation of processing.

Objecting to direct marketing

You have a specific right to object to our use of your information for direct marketing purposes, which we will always act upon.

Objecting to automated decision making

You have a right to object if we have made an automated decision, including profiling, which has legal and significant effect against you. You may also have the right to challenge the decision and ask for a human review. These rights do not apply if we are authorised by the law to make such decisions and appropriate safeguards are in place to protect your rights.

Restricting the use of your personal information

If you are uncertain about the accuracy or our use of your information, you can ask us to stop using your information until your query is resolved. We will let you know the outcome before we take any further action in relation to this information.

Right to Erasure

You can ask us to delete your personal information in some circumstances, such as if your policy has ended and we do not need to keep your information for legal or regulatory reasons. If we are using consent to process your information and you withdraw it, you can ask us to erase your information.

12. Right to complain to the supervisory authority

If you are unhappy with how we are using your information, you have the right to complain to the Data Protection Commissioner. We would encourage you to contact us first, so we can deal with your concerns.

The Information Commissioner's office can be contacted by

- Visiting their website www.ico.org.uk
- Phone on 0303 123 1113
- Write to Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

13. Changes to the way we use your information

If we want to use your personal information for a new purpose which we haven't previously told you about, we will contact you to explain the new use of your information. We will set out why we are using it and our legal reasons.

14. Changes to our Privacy Notice

Making sure that we keep you up to date with privacy information is a continuous responsibility and we keep this notice under review. We will update our notice as changes are required.

This privacy notice was last updated on the 21 September 2020

15. Contact us

If you have any questions or comments regarding this privacy notice, or if you are unhappy about the way Royal London uses your information, please contact us using the details below.

Post: Data Protection Officer, Royal London, Royal London House, Alderley Road, Wilmslow, Cheshire, SK9 1PF.

Email: GDPR@Royallondon.com

Royal London Marketing Limited have chosen Responsible Life to provide customers with advice on Later Life Lending products, including Equity Release. Responsible Life are not part of the Royal London Group.

Royal London Marketing Limited is authorised and regulated by the Financial Conduct Authority and introduces Royal London's customers to other insurance companies. The firm is on the Financial Services Register, registration number 302391. Registered in England and Wales number 4414137. Registered office: 55 Gracechurch Street, London, EC3V 0RL.