

Fair Collection Notice

How we use your personal information

We, Prudential International Assurance Plc (**PIA**), take the privacy and protection of your personal information seriously. PIA will operate as the data controller in respect of the data we collect about you.

So we've set out below information about our processing of your personal information, what rights you have, and how you can get in touch if you want to know more.

When we say personal information, we mean information about you, such as your name, date of birth and contact details. We collect personal information from you that is necessary for us to either provide you with the product or service you've requested or to comply with statutory or contractual requirements. Unfortunately, if you don't provide all of the information we require this may mean we are unable to provide our products and services to you.

Part A – How we use your personal information and why

We, the Prudential Group and our Business Partners, will use the personal information you provide to us, together with other information, for the following purposes:

- the administration of our products and services, including to enable us to perform our obligations to you and to provide any relevant services as discussed with you prior to any purchase of a product or service;
- complying with any regulatory or other legal requirements;
- carrying out checks using agencies such as credit reference agencies, tracing companies, or publicly available information (See Part B for more);
- the provision of customer services – like to reply to a question, or tell you that something's changing;
- automated decision-making or profiling (see Part C for more);
- keeping your information on record and carrying out other internal business administration.

Some of the purposes above are necessary to allow us to perform our contractual obligations to you and to enable us to comply with applicable laws and regulation. We may also rely on legitimate interests in using and sharing your personal information for the purposes described above to improve our products and services. This allows us to explore ways to develop our business and to gain insights into how our products and services are used.

In addition, we the Prudential Group and our Marketing Partners, may use the personal information you provide to us, together with other information, to send you direct marketing offers by electronic or non-electronic means including by post. Please see Part G for further details. To the extent that we need your consent to use your personal information for these purposes, you explicitly provide your consent as set out in Part G as appropriate.

Who we share your personal information with and why

We'll share your personal information within the Prudential Group and with our Business Partners, for any of the purposes set out in Part A. If you have a joint policy or investment, the other person may receive your personal information too. If appropriate, we may also pass on your personal information to financial crime prevention agencies, legal, regulatory or government bodies.

As we, the Prudential Group, and some of our Business Partners are global companies, we might need to send your personal information to countries that have different data protection laws to the European Economic Area. These transfers will only be:

- to countries in respect of which the European Commission has issued a data protection 'adequacy' decision (such as Guernsey, Isle of Man and Jersey),
- to other countries, such as India or the United States of America, where appropriate safeguards have been put in place (such as the European Commission's Model Clauses), or
- where the transfer is necessary to allow us to perform our contractual obligations to you or to perform a contract which is in your interest.

If you want to know more about the above safeguards – like our use of the European Commission's Model Clauses which govern the transfer of information outside of the European Economic Area – further information is available on request.

We keep your personal information for a set amount of time

Your personal information will be stored either for as long as you (or your joint policyholder) are our customer, or longer if required by law or as necessary to defend ourselves against legal action. Generally we will continue to hold your information for 30 years after you cease to be our customer. This is in order to manage any potentially long running disputes, in order to provide appropriate compensation to legacy holders of policies which have lapsed or to compensate customers in the event of a tax refund. For further information about our data retention policy, please visit www.prudential-international.com/mydata-recordretention. (To access this website, all characters must be typed in lowercase format.)

Part B – Reference checks

For certain products, we may use approved credit reference agencies, tracing companies, financial crime prevention agencies, or publicly available information, to help us to check your identity, as well as to prevent fraud and money laundering; this may include checks on your current or previous addresses. Results of these may be recorded for future reference.

These checks may also be carried out for a joint policy holder or person(s) that you provide personal information on. Should we ever lose contact with you, we may use these agencies to verify your address to help us get back in touch.

Any transfer of your personal information will always be done securely.

Part C – We may use your personal information to make automated decisions or profile you

We, the Prudential Group, our Business Partners, and our Marketing Partners may use your personal information to make automated decisions affecting you or to conduct other profiling (for example, marketing profiling).

To the extent that we conduct such automated decision making activity, we'll provide you with further information at the appropriate time.

Part D – Use of your sensitive personal information

For certain products or services, we'll need to process your sensitive personal information, such as information relating to health, genetics, biometric identifiers and sexual orientation. To the extent that we need your explicit consent to process this kind of personal information in the manner described in Parts A, B, and C, you explicitly provide your consent by ticking the relevant boxes/signing the form as appropriate.

Part E – You're in control

When it comes to how we use your personal information, you've got the right to:

- request a copy of your personal information for free (we may charge you for this if the request is manifestly unfounded or excessive). We shall respond as soon as reasonably possible and at the latest within 30 days from the date of your request;
- in certain circumstances request that we move your personal information to another organisation if you want us to;
- request that we correct anything that's wrong, or complete any incomplete personal information;
- ask us to delete your personal information if it is no longer needed for the purposes set out in Part A or if there is no other legal basis for the processing;
- limit how we use your personal information or withdraw your consents you have given for the processing of your personal information (including consents to automated decision making);
- complain to a data protection authority or another independent regulator about how we're using it.

Note: To the extent that we process your data for direct marketing or other processing based on our legitimate interest, including any profiling on the basis of our legitimate interests, you have a right to object to such processing.

If you want to do any of these things, or would like an explanation as regards these rights, we've explained how you can get in touch in the '**Contact Us**' section below.

If you do need to speak to us, it'll be useful to have to hand that the data controller of your personal information is PIA. PIA has also appointed a Data Protection Officer who can be reached at the details shown in the '**Contact Us**' section of this document.

We may monitor or record calls or any other communication we have with you. This will be for training, for security, or to help us check for quality.

Part F – Acting on someone else's behalf?

If you give us personal information about another person (or persons), we'll take that to mean they have appointed and authorised you to act on their behalf. This includes providing consent to:

- our processing of their personal information and sensitive personal information (as we've explained in Parts A, B, C, and D above);
- you getting any information protection notices on their behalf.

If for any reason you are concerned as to whether you are permitted to provide us with the other person's information, please contact us on the phone number provided in the '**Contact Us**' section of this notice before sending us anything.

Part G – Direct marketing

From time to time, we, the Prudential Group and our Marketing Partners may like to contact you by electronic or non-electronic means with details about products, services and any special offers. Please note that any consent you give will not apply to M&G Investments Group, Prudential UK and Prudential plc as they operate their own customer databases and may contact you separately.

If you consent to us contacting you for this purpose, please tick to say how we may contact you (tick as many or as few as you like).

Email Phone Text Post

And if you change your mind, and/or you would like to opt-out of receiving direct marketing, it's easy to let us know. Just contact us at the details noted in the '**Contact Us**' section of this notice.

If you want to exercise your rights in Part E or if you require any other information about any other part of this notice, you can contact us in a number of different ways.

Contact Us

Write to us at: Data Protection Officer
Prudential International
Montague House
Adelaide Road
Dublin 2

Call us on: +353 1 483 0500

The Prudential Group means any connected companies of PIA (including [the Prudential Assurance Company Limited, Prudential Distribution Limited, Prudential Life Time Mortgages Limited, Prudential Pensions Limited, and Prudential Financial Planning Limited, Prudential Plc, Prudential Services Limited, PGDS (UK ONE) Limited, Prudential Global Services Private Limited,

Prudential Corporation Asia, Jackson National Life and PPM America, Inc. M&G Investments Group and Prudential Corporate Pensions Trustee Limited]).

Business Partners means our service providers, accountants, auditors, IT service and platform providers, intermediaries, reinsurers, retrocessionaires, investment managers, agents, pension trustees (and other stakeholders), scheme advisors, introducers and our legal advisers.

Marketing Partners means our service providers, intermediaries, pension trustees (and other stakeholders), scheme advisors and introducers.