

# Privacy 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, M&G plc 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'll use your personal information if we consider it is in our legitimate business interests so that we can operate as an efficient and effective business and ensure that our policyholders are appropriately protected. We use your personal information:

- to detect and prevent financial crime
- for marketing purposes, including profiling
- to obtain reinsurance for the policies we underwrite
- identifying customers that require additional support
- market research, data analytics including profiling, staff training and provision of on-line services
- for management information purposes including risk assessments, performance and management reporting.

Where we rely on legitimate interests, we will always balance this against your rights and freedoms. Where your rights override our legitimate interests we will cease to process personal data.

In addition, we M&G plc 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, where you have consented for us to do so. Please see Part G for further details.

## Who we share your personal information with and why

We are the data controller in respect of the personal information we collect about you and in this capacity we will share your personal information within M&G plc, with our Business Partners and with our Marketing 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, M&G plc, 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, or to other countries, such as India or the United States of America, where but only appropriate safeguards have been put in place first. In more limited circumstances, we may also need to rely on a derogation under applicable privacy laws.

If you want to know more about these safeguards – like our use of the European Commission's Standard Contractual 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**

We'll keep your personal information while you're one of our policyholders (including joint policyholders), and for seven years from cessation, or longer if we need to by law. It'll always be in line with our data retention policy.

## 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, M&G plc, 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, we will only process such data as provided by your consent.

## 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 within one month of the date of receiving 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);
- object to us using your personal information for direct marketing (including related profiling) or other processing based on legitimate interests;
- complain to a data protection authority or another independent regulator about how we're using it.

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.

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 data privacy 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 before sending us anything.

## Part G – Direct marketing

From time to time, we, M&G plc, our Business Partners 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 and Prudential UK as they operate their own customer databases.

If you previously provided us with your marketing preferences for email, phone and/or text, we'll ensure that these preferences are adhered to.

We'll continue to send you communications by post unless you have asked us not to. If you've opted out already from post and/or email, phone or text, then we will not send you marketing communications.

[pru.co.uk](https://pru.co.uk)

The registered office of Prudential International is in Ireland at Fitzwilliam Court, Leeson Cl, Dublin 2, D02 TC95. Prudential International is a marketing name of Prudential International Assurance plc, a life assurance company operating from Ireland. Registration No. 209956. Prudential International Assurance plc is authorised and regulated by the Central Bank of Ireland and in the context of its UK regulated activities only, is authorised by the Prudential Regulation Authority and subject to regulation by the Financial Conduct Authority and limited regulation by the Prudential Regulation Authority. Details about the extent of our regulation by the Prudential Regulation Authority are available from us on request. Prudential International is part of the same corporate group as The Prudential Assurance Company Limited. Both The Prudential Assurance Company Limited and Prudential International are direct and indirect subsidiaries respectively of M&G plc, a company incorporated in the United Kingdom. The Prudential Assurance Company Limited is not affiliated in any manner with Prudential Financial, Inc, a company whose principal place of business is in the United States of America or Prudential plc, an international group incorporated in the United Kingdom.

If you haven't previously provided us with your preferences, or wish to change your mind on your current preferences, it's easy to let us know. Just contact us at the details noted in the 'Contact Us' section.

## Contact Us

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

Write to us at: Data Protection Officer  
Fitzwilliam Court  
Leeson Close  
Dublin 2  
D02 TC95

Call us on: +353 1 483 0500

- \* M&G plc Group means any directly or indirectly connected companies of PIA within M&G plc Group (including but not limited to The Prudential Assurance Company Limited, Prudential Distribution Limited, Prudential Pensions Limited, M&G Wealth Advice Limited, Prudential Services Limited, PGDS (UK ONE) Limited, M&G Global Services Private Limited, 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, selected third party financial and insurance product providers and our legal advisers.
- \*\*\* Marketing Partners means our service providers, intermediaries, pension trustees (and other stakeholders), scheme advisors, introducers and selected third party financial and insurance product providers.