

# Data Protection Notice

In relation to individuals whose personal data Prudential processes due to its arrangements with pensions trustees and other financial services organisations

We, Prudential UK\*, may receive your personal information from the trustees of a pension scheme, your employer, or other financial services organisations (each a "Data Provider") and/or direct from you. Regardless of where we obtain such information from, we take the privacy and protection of your personal information seriously. We own the personal information we hold about you and decide what happens to it. This makes us a "data controller" in respect of the personal information. You should note that the Data Provider will also be a "data controller" in respect of the personal information it holds about you.

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 personal information about you which we receive from a Data Provider or any other personal information which you provide directly to us. This may include, for example, your name, your date of birth, your sex, address, postcode, a unique identifier and contact details. Please see Part D below regarding sensitive personal information.

We collect personal information about 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 we don't receive 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 we receive about you, together with other information, for the following purposes:

- the administration of our products and services, including to enable us to perform our obligations under any contracts or policies
- complying with any regulatory or other legal requirements
- carrying out checks using publicly available information or third party companies (such as credit reference agencies or tracing companies) (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 and to enable us to comply with applicable laws and regulation. To the extent that your personal information is provided to us by a Data Provider and we need your consent to use your personal information for the purposes described above, the Data Provider is responsible for providing the consent to us. Alternatively, where you provide personal information to us directly, we may obtain your consent directly from you. To the extent that we rely on your consent as the basis on which we process your personal information for the purposes described above, we'll only process such data as provided for by your consent. We may also rely on legitimate interests in using and sharing your personal information for the purposes described above (including to improve our products and services which allows us to explore ways to develop our business and to gain insights into how our products and services are used) and on any other applicable lawful basis.

### 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 appropriate, we may also pass on personal data to financial crime prevention agencies, any legal, regulatory or government bodies.

As the Prudential Group and some of our Business Partners are global companies, we might need to send your details to countries that have different data protection laws to the UK or 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 companies in other countries, such as India or the United States of America, where we have put appropriate safeguards in place.

If you want to know more about these 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.

Any transfer of your personal information will always be done in accordance with applicable law.

### We keep your information for a set amount of time

Your personal information will be stored for as long as is necessary (including by reference to applicable law). It'll always be in line with our data retention policy.

## Part B – Reference checks

We may use publicly available information or certain third party service providers (for example, credit agencies or tracing companies) 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 address. Results of these may be recorded for future reference.

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

We, the Prudential Group and our Business Partners may use your personal information to make automated decisions affecting you or to conduct other. 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) a Data Provider may from time to time provide this to us. In such circumstances the Data Provider is responsible for obtaining any explicit consent necessary for us to process this kind of personal information. Alternatively, if you provide sensitive personal information directly to us, we will obtain your explicit consent to the extent necessary. If you have previously provided sensitive personal information directly to us, to the extent that we rely on your explicit consent as the basis on which we process this kind of personal information in the manner described in Parts A and B, we'll only process such data as provided for 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)
- 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 consent (included regarding automated decision making) to the processing of your personal information
- object to us using your personal information for 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 Prudential UK. We have also appointed a Data Protection Officer who can be reached at the address shown in the contact us section of this document.

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

As set out at the start of this FCN, a Data Provider is also a data controller in respect of your personal information and you are likely to have similar rights in respect of the personal information held by a Data Provider.

## 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 below before sending us anything.

## Contact us

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.

Write to us at: Customer Service Centre  
Prudential  
Lancing  
BN15 8GB

Call us on: 0800 000 000

Or visit: [www.pru.co.uk](http://www.pru.co.uk)

- \* Prudential UK means The Prudential Assurance Company Limited and Prudential Pensions Limited as appropriate.
- \*\* the Prudential Group means Prudential UK and its affiliates (including Prudential Distribution Limited, Prudential International Assurance plc, Prudential Plc, Prudential Services Limited, PGDS (UK ONE) Limited, Prudential Life Time Mortgages Limited, Prudential Global Services Private Limited, Prudential Corporation Asia, Jackson National Life and PPM America, Inc. M&G Investments Group, Prudential Financial Planning Limited 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.