

## Privacy and Cookies Policy – July 2018

Synergy Financial Products Limited (SFPL) is committed to protecting the privacy and security of our customers. SFPL is a provider of investment and protection plans.

We recognise the need to respect and protect information that is collected or disclosed to us (called "Personal Information" explained below).

This notice is intended to tell you how we use your Personal Information and how we collect and use your Personal Information during and after your relationship with us. SFPL ensures that it processes Personal Information in compliance with applicable data protection laws, including, the *General Data Protection Regulation ((EU) 2016/679) (UK GDPR)* and the *Data Protection Act 2018 (DPA 2018)*, collectively "**Data Protection Law**"

### What is personal information?

Personal Information consists of any information that relates to you and/or information from which you can be identified, directly or indirectly as relating to you. For example, information which identifies you may consist of your name, address, telephone number, and an online identifier (such as cookie identifiers and your IP address). When we combine other information (information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

### What personal information do we collect about you?

We may collect, use and store different kinds of Personal Information about our policyholders (and family members) and prospective policyholders and third parties. The Personal Information we collect includes:

- Name
- Contact details
- Date of birth
- Financial/bank account information
- Marital status
- Payment information
- Medical information

In some circumstances we may also obtain Special Category Personal Data (as defined in the UK GDPR) such as healthcare and lifestyle and employment status information which includes medical information which may be shared with external our underwriters. This may also involve gathering information to handle claims on some of our policies. We may also collect data relating to children (as defined in the UK GDPR) such as date of birth. This is to provide our customers with the appropriate insurance cover within your plan. All processing of data concerning children will be processed in accordance with the guidelines set out by the ICO.

### Provision of data

Our customers are obliged to provide Personal Information to us to allow us to carry out the performance of our duties in administering your policy.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with SFPL.

Failure to provide this information may mean that we cannot perform this contract and you would not have access to our products.

### How is your personal information collected by us?

SFPL collects information through you, for example, when you apply for our products online, vary the benefits of your plan or if you contact our customer service team.

We may obtain information through the use of technology, such as Cookies, when you use our website. For more information about Cookies, please see our Cookie Policy on the SFPL website.

## **How do we use your information?**

We may use the Personal Information we collect for the following purposes:

- To administer and manage your policy with SFPL
- To provide customer service support and including training and quality purposes
- To investigate and manage complaints
- To fulfil any regulatory obligations.

The law allows us to use the Personal Information as set out above on the basis that the processing is necessary for the performance of a contract with you.

## **To whom do we disclose your information?**

We will only use your Personal Information for our business purposes (performance of a contract) as set out above. We disclose your information to relevant third parties in the course of this activity such as Outsourced Professional Administration Limited who provide administration services to us and parties that provide insurance for your policy, if applicable. These parties are also governed by UK GDPR. For policyholders invested in our Dividend Income product information we also share data with our external stockbroker.

We may also disclose Personal Information to establish, exercise or defend our legal rights including providing information to others and/or in connection with any ongoing or prospective legal proceedings. We may also disclose Personal Information to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personal Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Information.

We never sell any of your Personal Information to third parties.

## **International transfer of data**

The Personal Information that we collect from you will be stored and processed in within the European Economic Area (EEA). We will not transfer your data outside of the EEA.

## **Data retention – how long we will store your personal information**

SFPL retains Personal Information for as long as necessary to fulfil the purposes for which your Personal Information has been collected as outlined in this notice. When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

## **Accessing your personal data and other rights you have**

Under certain circumstances, you have the following rights in relation to your Personal Information:

Subject Access - you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.

Right to Withdraw Consent – where our use of your Personal Information is based upon your consent, you have the right to withdraw such consent at any time. In the event you wish to withdraw your consent to processing, please contact us using the details provided below.

Data Portability – you may, in certain circumstances, request us to port (that is transmit) your Personal Information directly to another organisation.

Rectification – we want to ensure that the Personal Information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. We will rectify or update any incorrect or inaccurate Personal Information about you.

Erasure ('right to be forgotten') - you have the right to have your Personal Information 'erased' in certain specified situations. To find out more about your right to erasure please visit [ico.org.uk](http://ico.org.uk).

Restriction of processing – you have the right in certain specified situations to require us to stop processing your Personal Information and to only store such Personal Information.

Object to processing – you have the right to object to specific types of processing of your Personal Information, such as, where we are processing your Personal Information for the purposes of direct marketing.

Prevent automated decision-taking – in certain circumstances, you have the right not to be subject to decisions being taken solely on the basis of automated processing (this is not currently carried out by SFPL).

### **Enforcing your rights**

If you wish to enforce any of your rights as above please contact us on our details below.

We will respond to your request without undue delay and no later than one month from receipt of any such request, unless a longer period is permitted by law. We may, in some circumstances, charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable Data Protection law.

### **Complaints**

If you are concerned that we have not complied with your legal rights under applicable Data Protection law, you may contact the Information Commissioner's Office ([ico.org.uk](http://ico.org.uk)) which is the data protection regulator in the UK.

### **Changes to this notice**

It is important that you check for updates to our notice, as we may change it from time to time. The “Date last updated” text at the bottom of this notice states when the notice was last updated and any changes will become effective upon our posting of the revised notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent.

### **Contact us**

If you have any queries at all in relation to your data and how we protect your data rights, please contact the Compliance Officer. Address: Synergy Financial Products Limited, Centrium 1, Griffiths Way, St Albans, AL1 2RD, Email: [admin@sfpl.co.uk](mailto:admin@sfpl.co.uk)

### **DOCUMENT HISTORY**

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