

SFPL Data Privacy Policy



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Purpose

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 **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018 (DPA 2018)**, collectively referred to as "**Data Protection Law**".

Our use of cookies and similar technologies is also subject to the **Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR)** and other applicable legislation and regulatory requirements.

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. 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), 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 (for protection plans)

In some circumstances we may also obtain **Special Category Personal Data** (as defined in the UK GDPR) such as healthcare, lifestyle and employment status information, which may include medical information. This information may be shared with external underwriters where necessary and lawful. This may also involve gathering information to handle claims on some of our policies.

We may also collect data relating to children, such as date of birth, where this is necessary to provide our customers with the appropriate cover within their plan. Any processing of Personal Information relating to children will be carried out in accordance with applicable Data Protection Law and relevant guidance issued by the Information Commissioner's Office (ICO).

Provision of data

Our customers may be required to provide Personal Information to us where this is necessary for us to administer their policy, provide our products or services, comply with our legal and regulatory obligations, or otherwise fulfil the purposes explained in this notice.

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.

Where certain Personal Information is necessary for us to provide a product or service or to comply with a legal or regulatory obligation, failure to provide that information may mean that we are unable to provide or administer the relevant product or service.

How is your Personal Information collected by us?

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

We may also obtain information through the use of technology, such as cookies and similar technologies, when you use our website.

How do we use your information?

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

- To administer and manage your plan with SFPL
- To provide customer service and support, including for training and quality purposes
- To investigate and manage complaints
- To fulfil our legal and regulatory obligations
- To establish, exercise or defend our legal rights
- To prevent and detect fraud, financial crime and other unlawful activity

- To maintain the security and integrity of our systems and website and:
- Where applicable, to communicate with you about our products and services in accordance with applicable law.

We will only process your Personal Information where we have a lawful basis to do so under applicable Data Protection Law. Depending on the circumstances and purpose of the processing, this may include:

- Where processing is necessary for the performance of a contract with you or to take steps at your request before entering into a contract
- Where processing is necessary for compliance with a legal or regulatory obligation to which SFPL is subject
- Where processing is necessary for our legitimate interests, provided that those interests are not overridden by your interests or fundamental rights and freedoms
- Where you have provided your consent, where consent is required
- Where another lawful basis permitted by Data Protection Law applies.

The lawful basis relied upon will depend on the particular processing activity. Where we process Special Category Personal Data, we will also ensure that an applicable condition under the UK GDPR and/or other applicable Data Protection Law is satisfied.

To whom do we disclose your information?

We will only disclose your Personal Information where there is a lawful and appropriate reason to do so, including where disclosure is necessary to provide or administer our products and services, comply with a legal or regulatory obligation, protect our legitimate interests or establish, exercise or defend our legal rights.

We may disclose your information to relevant third parties in the course of these activities, such as **Outsourced Professional Administration Limited**, which provides administration services to us, and parties that provide insurance or other services connected with your policy, where applicable.

For policyholders invested in our Dividend Income product, we may also share relevant information with our external stockbroker.

Where we use third-party service providers to process Personal Information on our behalf, we will take appropriate steps to ensure that they process Personal Information in accordance with applicable Data Protection Law and our contractual requirements.

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 where we reasonably believe that such person may apply to a court or other competent authority for disclosure of

that Personal Information and, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure.

We do not sell your Personal Information to third parties.

International transfer of data

The Personal Information that we collect from you will normally be stored and processed within the European Economic Area (EEA).

Where we need to transfer Personal Information outside the UK or EEA, we will only do so where permitted by applicable Data Protection Law and will ensure that appropriate safeguards are in place where required.

These safeguards may include an adequacy decision, appropriate contractual safeguards such as the UK International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses, or another lawful transfer mechanism recognised under applicable Data Protection Law.

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, including to administer your policy, comply with our legal and regulatory obligations, resolve disputes and establish, exercise or defend our legal rights.

We may retain Personal Information for longer where this is necessary to comply with applicable legal or regulatory requirements.

When your Personal Information is no longer required, it will be securely deleted or otherwise disposed of in accordance with applicable law and our data retention procedures.

Accessing your Personal Information 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. Withdrawal of consent will not affect the lawfulness of processing carried out before

consent was withdrawn. 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 provide your Personal Information in a structured, commonly used and machine-readable format or transmit it 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 incorrect or inaccurate Personal Information where appropriate.

Erasure ("right to be forgotten") – you have the right to have your Personal Information erased in certain specified situations. This right is subject to exceptions under applicable Data Protection Law.

Restriction of processing – you have the right, in certain specified situations, to require us to restrict the processing of your Personal Information.

Object to processing – you have the right to object to certain types of processing of your Personal Information, including, in certain circumstances, where we rely on legitimate interests as our lawful basis for processing. You also have an absolute right to object to the processing of your Personal Information for direct marketing purposes.

Prevent automated decision-taking – in certain circumstances, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you. SFPL does not currently carry out such processing.

The availability of these rights and the circumstances in which they apply depend on the particular circumstances and applicable Data Protection Law.

Enforcing your rights

If you wish to exercise any of your rights as described above, please contact us using the details provided below.

We will respond to your request without undue delay and normally no later than one month from receipt of the request, unless a longer period is permitted by law. In certain circumstances, this period may be extended by up to a further two months where permitted by applicable Data Protection Law. If this applies, we will inform you.

We may, in some circumstances, charge a reasonable fee for dealing with your request where permitted by applicable Data Protection Law. We will notify you if this applies.

Complaints

If you are concerned that we have not complied with your legal rights under applicable Data Protection Law, you should first contact SFPL using the contact details below so that we can investigate your concerns.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection matters.

Further information is available from the ICO at **ico.org.uk**.

Changes to this notice

It is important that you check for updates to this notice, as we may change it from time to time to reflect changes to our business, products, services, technology, legal or regulatory requirements or our data processing activities.

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 in relation to your Personal Information, our use of cookies or 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

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