

# POLICYHOLDER PRIVACY NOTICE (BUY-IN)

## DATA PROTECTION AND HOW WE USE YOUR PERSONAL INFORMATION

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### About this notice

This privacy notice tells you how we, Just Retirement Limited (**Just**), collect and use personal information when we set up and manage a defined benefit individual annuity policy.

A defined benefit individual annuity policy is an insurance policy that pension scheme trustees buy to provide members' benefits from an insurance policy rather than a defined benefit pension scheme. This is called a 'buy-in'. This privacy notice explains how we will use and protect the information the trustees of your scheme give us so that we can set up and manage the buy-in policy.

We take our responsibility to protect your personal information seriously, and will make sure that the information you and scheme trustees give us will always be processed and transferred in line with all data-protection laws and regulations that apply.

### Scope of this privacy notice

In order to provide our services to you, we may need to process personal information about you, members of your family, beneficiaries (people who may become entitled to benefits under the policy) and any other people connected to the scheme. This privacy notice applies to everyone whose personal information we process in the course of providing our services. Each person is known as a 'data subject'. Where this privacy notice refers to 'you' it includes the other data subjects.

When we process your personal information, we act as a '**data controller**'. This means we decide how your personal information is processed and what it is processed for.

We co-operate with the trustees where necessary to meet our legal obligations. For example, the trustees must make sure the personal information they give us is accurate.

This privacy notice does not apply to any services where we act as a '**data processor**' (that is, where we are processing information on behalf of the trustees).

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### What is personal information and what personal information do you process?

**'Personal information'** is information that identifies you or relates to a person who can be identified.

The personal information we process may include the following.

- Personal details such as your name, gender, date of birth, phone number, address and postcode, and other information that identifies you (for example, your National Insurance number, payroll number or pension-scheme number)
- Your family, lifestyle and social circumstances (for example, your marital status and details of your family and dependants)
- Employment and financial details such as your pensionable pay, length of service, employment and career information, salary and pension amounts.

**Some of the information that we collect and process is known as 'sensitive information'. This includes information about your or your partner's physical and mental health (for example when payment is claimed as a result of ill health).**

**We only collect sensitive information if you have already given us your permission. Where this notice refers to personal information it includes sensitive information.**

### Where do you collect my personal information from?

We get all or some of the personal information from the trustees of the scheme you are a member of. The trustees are also data controllers for this personal information, so you may want to also contact the trustees if you have any questions about how your personal information is processed.

Also, when you contact us we may monitor and record phone calls or emails and keep copies of any correspondence.

### What is the legal basis for processing my personal information?

We must have a legal basis (a valid legal reason) for processing your personal information. The legal basis will usually be one of the following.

- For our legitimate interests (For example, to provide our services, meet our contractual obligations to the trustees, make sure that our services are appropriate for the trustees, improve our services, manage our risks, maintain accurate records, and manage our business in an efficient way)
- For the legitimate interests of the trustees and other third parties, including the interests of anyone who buys or gains a share in our company (For example, to investigate and assess claims, and to prevent and detect fraud)
- For our legitimate business interests, as long as those interests are not overridden by your interests and rights (For example, for business analysis, research and statistical purposes including analysing trends, costs and charges, carrying out actuarial work, tailoring our business and our services, carrying out risk assessments and managing risk)
- To meet our legal and professional obligations

The legal basis for processing sensitive information is all or some of the following.

- We have your permission, if the law says that we need your permission (you can withdraw your permission at any time by contacting us)
- To establish, exercise or defend legal claims
- The law allows us to process sensitive information without your permission (for example, if we need to process the information to make a decision about eligibility for, or benefits due under, an occupational pension scheme)

### How do you use my personal information?

We use your personal information to do the following.

- Provide our services and meet our obligations under the policy (for example, confirming your identity or making payments that are due under the policy)
- Help us calculate our reserves accurately
- Analyse data, such as information on death rates and contributing factors
- Exercise, defend or protect our legal rights or the rights of the trustees or third parties
- Meet our legal and professional obligations and co-operate with regulators

### Who do you share my personal information with?

We may share your personal information with the following third parties in the circumstances shown.

- Any Just group company, for the uses and purposes set out above
- Intermediaries, advisors and business partners (including our administrator), for the purposes of meeting our obligations to you (for example, providing services)
- Our third-party reinsurer (the insurance company that shares part of the risk that members will live longer than expected), for the purpose of evaluating risk
- Third-party service providers, so they can provide essential business services to us or our group of companies (for example, payroll services, data storage and backup, printing, email facilities, auditing and other services)
- Professional and research bodies, when we have to or are asked to do so
- Other third parties, if we have to provide your personal information under any law or regulation that applies, including laws and regulations outside the country you live in
- Other relevant third parties, if necessary as a result of any reorganisation, merger, sale, transfer or other disposal of some or all of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)

Your personal information will only be available to people who need to see it, and it may be made anonymous when it is processed for analysis and research purposes. If possible, we will make your personal information anonymous before we share it with other companies. If the information cannot be made anonymous, we will make sure appropriate confidentiality and security measures are in place.

We will only share sensitive information which is relevant to the service being provided. We will not use it for marketing purposes.

You can see our reinsurer's privacy notice at [www.rgare.com/privacy-policy](http://www.rgare.com/privacy-policy).

You can see our administrator's privacy notice at [www.jltemployeebenefits.com/your-data](http://www.jltemployeebenefits.com/your-data).

### Is my personal information safe?

We maintain appropriate technical and organisational security measures to protect your personal information against loss, misuse, unauthorised access or alteration.

We regularly evaluate our security measures to make sure they are adequate.

### How long do you keep my personal information for?

We may keep your personal information for as long as is necessary for the purposes described in this privacy notice. When we stop providing our services, we will then keep your personal information for up to seven years from the date that the last beneficiary of the group of policyholders you are associated with has died. This lets us meet our legal and regulatory obligations to exercise, manage or defend legal rights and claims.

Anonymous information is not considered to be personal information as nobody can be identified from it. We use anonymous information for actuarial and business analysis, business research and reporting to help us to develop our products and services. We will keep it for seven years from the date that the last beneficiary of the group of policyholders you are associated with has died.

### Do you transfer my personal information outside the EEA?

Your personal information is stored on secure servers in the UK or other countries within the European Economic Area (EEA). Countries outside the EEA may not have equivalent data-protection laws. If your information is transferred outside the EEA (for example, because any of our advisors or service providers have IT outside the EEA), we will make sure that your personal information is protected and kept secure in line with this privacy notice. We will review the relevant security measures to make sure that your information is protected to the same standard as it would be in the EEA.

## What are my rights relating to personal information?

You have options and choices over how we use your personal information. We may keep a record of your choices, including any objection to receiving marketing communications, so that we can continue to respect your wishes and do not contact you while your objection applies.

Under certain circumstances you have the right to:

- receive a copy of the personal information we hold about you
- ask us to correct or delete personal information
- restrict how we process your personal information while we are checking or investigating your concerns about the relevant information
- object to us processing your information, and
- ask us to give personal information to someone else.

If you have given us permission to process any personal information for a certain purpose, you can withdraw that permission at any time.

We can provide a copy of your personal information free of charge. However, if you make several requests, we can:

- charge you a reasonable fee to cover our costs of providing the information, or
- turn down your request.

## Changes to this privacy notice

You can ask us for a copy of this privacy notice using the contact details set out below. We may change this privacy notice or update it to reflect any changes in data-protection and privacy laws.

If we decide to change this privacy notice, we will display the latest version at [www.wearejust.co.uk/definedbenefit/trustees/publications/](http://www.wearejust.co.uk/definedbenefit/trustees/publications/). If any change to this privacy notice will have a substantial effect on you, we will give you reasonable notice of the changes so that you have the opportunity to exercise your rights (for example, to object to the processing).

If we decide to change this privacy notice, we will display the latest version at [www.wearejust.co.uk/definedbenefit/trustees/publications/](http://www.wearejust.co.uk/definedbenefit/trustees/publications/). If any change to this privacy notice will have a substantial effect on you, we will ask the Trustee to give you reasonable notice of the changes so that you have the opportunity to exercise your rights (for example, to object to the processing).

## Questions and contacting us

If you have any questions about how your personal information is used, or you want to make a request relating to your rights, you can contact us as follows.

- By email: [dataprotection@wearejust.co.uk](mailto:dataprotection@wearejust.co.uk)
- By phone: **01737 233 288**

Call charges will apply. Lines are open Monday to Friday, 9am to 5pm. Calls may be recorded for training and monitoring purposes.

- By writing to us: Data Protection Officer, Just Group plc, Vale House, Roebuck Close, Bancroft Road, Reigate, Surrey, RH2 7RU

If you are not happy with a response you receive from us, you can refer the matter to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk).

## FOR MORE INFORMATION

Call: **01737 233 288**

Call rates apply. Lines are open Monday to Friday, 9am to 5pm.

Please note, calls may be monitored for training and audit purposes.

Email: [dataprotection@wearejust.co.uk](mailto:dataprotection@wearejust.co.uk)

Or visit our website for further information: [wearejust.co.uk](http://wearejust.co.uk)

**Please contact us if you would like this document in an alternative format.**

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