

Last reviewed: 1st April 2024

#### 1 - How we use your data

Reassured Limited is committed to protecting your privacy in accordance with the Data Protection Act 2018 and the UK GDPR (and any other applicable legislation). For the purposes of this Privacy Policy, references to "Reassured, us, we, our" are references to Reassured Limited.

Reassured Limited is a life insurance broker, headquartered in the United Kingdom. Our life insurance broker services are free and without obligation. At Reassured, we offer three different types of service:

- An online execution-only service, providing online information which will allow you to make your own decisions and purchase via your computer, or mobile device;
- A non-advised service where you will speak to an agent who can provide you with information and quotes based on your needs, allowing you to make an informed decision; and
- An advised service, where our advisers will consider your personal circumstances and provide a recommendation on which products will best suit your needs.

Our Privacy Policy is set out below. Please read this policy with care; it describes how we will process, share and use your data.

#### 2 - The information we collect

The personal information that we may collect about you broadly falls into the following categories:

## • Information that you provide voluntarily

Certain parts of our website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to provide you with a quote, receive further marketing communications from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Some of the personal information that you provide may include information classified by applicable data protection law as special category data, such as health-related information, which we need for the purposes of providing an accurate quote for you (or enabling third party insurance providers to provide an accurate quote for you). We have described in more detail below when, why and on what basis we will be collecting such special category data.

In order to provide you with an indicative quote, we will collect certain information via our websites this will include personal details such as your name, date of birth, contact numbers and email address. We will also be processing special category data in the form of health information such as your smoker status. Your information may then be shared with our insurance partners so that they can provide you with indicative quotes.

If you require tailored advice, appropriate for your needs and circumstances, we will need to collect further information from you, including financial, occupational, health and lifestyle information and details of any current policies.

Should you decide to proceed further we will collect more detailed health and lifestyle information, to allow the insurance companies to provide terms for a policy with them. Our insurance partners may use automated underwriting when providing you with a decision and guaranteed quote, based on the information you have provided, or they may undertake a manual underwriting review and may request further information before making a decision.

If you are using our online quote service, we will share this information with all of our insurance partners so that they can provide you with guaranteed quotes before you select which policy you intend to purchase. Our online insurance partners will use automated underwriting in order to provide you with a guaranteed quote based on the information you have provided.

For more information on the insurance companies we work with, see <u>who we may share your</u> <u>information with.</u>

#### • Information that we obtain from third party sources

If you are unable to provide us with the information required to arrange a policy for you, from time to time, we may receive personal information about you from third parties, such as your spouse or partner, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties may include your contact details and information about your health and lifestyle. We use the information we receive from these third parties to provide you with a quote and to arrange a policy for you.

If you have requested a quote directly from Sunlife Limited, then they will provide Reassured with your contact details so that Reassured can provide a quote which appropriate to your needs and arrange a policy.

#### 3 - Processing your Data (How we use your data)

Reassured will be handling the personal information you provide. This will include any sensitive personal data such as health information which you provide as part of the quotation and application process.

Reassured may use personal information for the following purposes:

- Provide you with a quotation and apply for a policy;
- Provide you with administrative services in relation to your policy;
- For the prevention, detection and investigation of financial crime, including fraud;
- Statistical and analytical research; and
- Where necessary, to comply with legal and regulatory obligations.

Reassured may use third-parties to process your data, however Reassured will remain as the data controller for such processing.

When processing your data Reassured do not undertake any automated decision making. However, when we provide your data to our insurance partners, for the purposes of obtaining a quote or applying for a policy, they may undertake an automated underwriting process. Details of this automated process and your rights to challenge the outcome are provided in the insurers' privacy policies which can be found on their websites.

#### We rely on the following legal bases to use your personal data:

**Contract**: the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.

**Consent**: In some circumstances we may be required to obtain your consent to provide you with direct marketing of our products and services. Where this requirement applies or where we have sought your consent, we will process your personal data with your consent (see <u>your rights</u> below for more information about how you may opt-out of marketing communications or withdraw your consent). We will also require your explicit consent as described at <u>the information we collect</u>.

#### 4 - Where your data is held and how we keep it secure

Your personal data is held on secure servers operated by Reassured and third-party service providers contracted by us. We will not transfer your data outside the UK, or European

Economic Area (EEA), and we comply with the protection offered to you under the Data Protection Act 2018, UK General Data Protection Regulation 2018 and any other applicable legislation in the UK.

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information and help ensure the confidentiality, integrity and availability of data. All data is encrypted when in transit and stored in resilient and secure data centres that are certified to globally recognised security standards.

## 5 - Your rights

You have the right to ask Reassured for a copy of the personal information we hold about you including call recordings.

If you would like to (a) access, correct, update or request deletion of your information; or (b) object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information, please contact Reassured using the <u>contact details provided here</u> and stating the nature of your request. Furthermore, if you believe the information we hold is incorrect please contact Reassured detailing any inaccuracies in that information. We will rectify any inaccuracies immediately.

You also have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the <u>contact details provided here</u>.

Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

## 6 - Retention of data

In order to meet the record keeping requirements of our regulator, the Financial Conduct Authority ("FCA"), we will retain your records for a period of 6 years after the end of the policy or policies we have arranged for you. We view 'end of the policy' to be either of the following - the point at which the policy reaches the end of the term, the point at which a claim is made under the policy or the date the policy is cancelled.

If you provided us with your contact details via a website, but have decided not to proceed any further, then we may keep your details for up to 12 months before we delete them.

If SunLife have provided us with your contact details, but you have decided not to proceed any further, then we will also keep your details for up to 12 months before we delete them. You will need to refer to SunLife's privacy policy to see how they process and retain your data.

If we have obtained further details from you directly and you have received advice or a quote from us, then we will store your data for a period of six years following the advice or quotation.

If you have provided further details and applied for a policy through us, then we will keep your data for a period of six years after any of the following events:

- Your policy is cancelled;
- Your policy term expires; or
- A claim is made on your policy which results in the policy expiring.

#### 7 - External links

The Reassured website contains links to websites operated by third parties under different privacy policies. Should you click one of those links, you will be leaving the Reassured site and this Privacy Policy will no longer apply.

### 8 - Ongoing service

As part of our ongoing service to you, we will contact you every few years in order to offer a review of your protection needs in light of any changes of circumstance that may have occurred in the intervening period. If you do not wish to be contacted then you can opt-out at any time.

From time to time we may also contact you with details of similar protection products and services we provide, that we believe may be of interest to you. Again, if you do not wish to be contacted then you can opt-out at any time.

## 9 - Who we may share your information with

We may share your information with our third party insurers and business partners:

- in order to obtain the quotes you have requested;
- to provide the insurers with the information they require in order to make a decision in regards to your insurance application;
- to arrange any insurance product on your behalf; and
- as otherwise required in order to fulfil our contract with you.

As set out in the information we collect, some of this information will be special category data.

In connection with the purposes set out in our Privacy Policy, third party service providers and data processors may have access to, or process, your data on behalf of Reassured Limited as the Data Controller. These include:

- IT Service providers, including those who help operate our online quote and application journey, website, telephony, IT and back office systems; and
- Legal advisers, accountants, auditors, financial institutions and professional service firms who act on our behalf;

Reassured's advice service operate on a 'Whole of Market' basis. This means that we will review all insurers to advise you on the policy most suited to your needs. Thus, we may share limited data with any insurance provider for the purpose of providing quotes, and your detailed information with your chosen insurance provider for the purpose of arranging an insurance policy

Reassured Limited offer quotations from a restricted panel of insurers, thus may share your data with any of the following **insurance partners** for the purpose of providing quotes and arranging an insurance policy:

- Aviva
- American International Group (AIG)
- Legal & General (L&G)
- Liverpool Victoria (LV=)
- OneFamily
- The Exeter
- SunLife
- VitalityLife
- Zurich

Limited anonymised information may be shared with advertising service provider's organisations we work with, such as Google, Facebook, Outbrain and Taboola. We may share data with them to carry out this activity. We carry out these activities to help us understand customer behaviour, advertise and improve our services for you now and in the future. We will not sell your data to third parties for them to market to you.

Your personal information may also be disclosed to any **competent law enforcement body**, **regulatory**, **government agency**, **court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

We may also share your data with **any other corporate entity in our group**, including entities that we may acquire or that may acquire us in the future. However, they will only use your personal information only for the purposes disclosed in this Privacy Notice.

We may also share your information to any other person if you have consented to the disclosure.

#### 10 - Newsletters

We may send you newsletters, or other communications, by email to keep you informed about our products and events. Our subscription lists will not be sold, rented or leased to any third-parties.

We use code within our emails to identify open rates and click through rates. This enables us to identify which individuals have opened the message or clicked on links within it so as to better tailor any follow-up communications.

You can remove yourself from the subscription lists at any time by clicking on the unsubscribe link within the email or by emailing <a href="marketing@reassured.co.uk">marketing@reassured.co.uk</a> stating "consent withdrawn", please also confirm your postcode, name and DOB to allow us to identify you correctly.

## 11 - Copyright

You may download, print extracts and/or make copies of works on this site for your own personal and non-commercial use, providing you acknowledge Reassured as the source of the information and include a link to our website.

#### 12 - Complaints and Contact

The data controllers for your personal information is Reassured Limited, which is registered with the Information Commissioners Office with registration number Z1676581.

Should you have any questions, concerns or complaints about the use of your personal information you can raise these by contacting our Data Protection Officer via email <a href="mailto:DPO\_contact@reassured.co.uk">DPO\_contact@reassured.co.uk</a> with a broad outline of the nature of your question, concern or complaint.

Alternatively, you may put your complaint in writing to:

The Data Protection Officer Reassured Limited Belvedere House Basing View Basingstoke Hampshire RG21 4HG

Or by phone: 0808 168 2025, selecting option 1 (Reassured) then option 4 (Complaints)

You have the **right to complain to the Information Commissioner's Office** about our collection and use of your personal information. For more information, please contact the Information Commissioner's Office (www.ico.org.uk):

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

# 13 - Changes to this policy

If we decide to change our Privacy Policy, we shall post changes on this page so that you are always aware of how we use your personal information.