



JUST RETIREMENT LIMITED

PRIVACY NOTICE

DATA PROTECTION AND HOW WE USE YOUR PERSONAL INFORMATION

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 annuity policy.

We take our responsibility to protect your personal information seriously, and will make sure that the information you and scheme trustees have given us (or will 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.

When we refer to relevant data protection laws and regulations, these are based on where you live and include:

- UK Data Protection Act 2018 and UK General Data Protection Regulations (UK GDPR)
- Data Protection (Jersey) Law 2018
- Data Protection (Bailiwick of Guernsey) Law 2017 and;
- Isle of Man Data Protection Act 2018

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, email address, home 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, and bank account details

Some of the information that we may collect and process is known as ‘special category information’. This includes potentially sensitive information about you or your partner’s physical and mental health.

We only collect special category information if you have already given us your permission.

Where this notice refers to personal information it includes special category information.

Where do you collect my personal information from?

We get personal information from the trustees of the scheme you are or were a member of.

We may ask you (or have already asked you) to provide sensitive information in a medical questionnaire in connection with your membership of the scheme.

We may also have collected sensitive information from you during a telephone interview with one of our underwriters, or from a report that your GP provides (if you gave us permission to get information from them).

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 to you, make sure that our services are appropriate for you, 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 - 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 special category information is all or some of the following.

- We have your explicit consent, 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 special category information without your permission

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 below
- Intermediaries, advisers and business partners (including our administrator), for the purposes of meeting our obligations to you (for example, providing services)
- Our third-party reinsurers, for the purpose of evaluating and sharing risks
- 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

*Just Group of Companies including: Just Retirement Limited, Just Retirement Money Limited, Just Retirement Management Services Limited, HUB Financial Solutions Limited, Partnership Life Assurance Company Limited, Partnership Home Loans Limited, and Partnership Services Limited. For a full list of the Just Group subsidiaries please refer to our Annual Report and Accounts at justgroupplc.co.uk. This information can be found in the report under the ‘Group Entities’ section.

- 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 only share sensitive information and personal data where it is necessary to do so in the context of the service being provided. We will not use it for marketing purposes.

We may share your personal information with one or more of our third-party reinsurers for the purpose of evaluating and sharing risk.

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 of the UK and EEA?

Whilst we keep your personal information on secure servers in the UK or countries within the EEA, we may be required to transfer your personal information to product providers and/or third parties, who may then transfer it to countries outside the UK and European Economic Area (EEA). The laws and rules that those countries have to protect personal information may not be equivalent to UK data protection laws.

For example, we transfer the information provided to product providers who may process your personal information outside of the UK and EEA for general administrative purposes, including the storage and backup of data and in order to provide you with a quote. Therefore, we may need to rely on a recognised legal adequacy or safeguarding mechanism, to ensure that your data is treated securely and in accordance with our privacy policy. If your information is transferred outside of the UK or EEA, we'll ensure that your data remains properly protected. These companies are required to process personal information about you in accordance with the current data protection laws and any successor legislation applicable in your jurisdiction of residence (UK, Jersey, Guernsey or Isle of Man).

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 on the next page. 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 wearejust.co.uk/definedbenefit/privacy-notices/. 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)

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
- 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, Enterprise House, Bancroft Road, Reigate, Surrey, RH2 7RP

If you have any concerns about how we handle your personal data, please contact us using the details provided above.

If you are not satisfied with our response or how we have managed your data, you also have the right to lodge a complaint with the data protection regulator for your area of residency:

For the UK:

Information Commissioner's Office (ICO).

- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Helpline number: **0303 123 1113**
- Website: ico.org.uk/make-a-complaint

For Jersey:

Jersey Office of the Information Commissioner (JOIC)

- Address: 2nd Floor, 5 Castle Street, St. Helier, Jersey, JE2 3BT
- Helpline: **+44 (0)1534 716 530**
- Website: jerseyoic.org

For Guernsey:

Office of the Data Protection Authority (ODPA)

- Address: Block A, Lefebvre Court, Lefebvre Street, St Peter Port, Guernsey, GY1 2JP
- Helpline: **+44 (0)1481 742 074**
- Website: odpa.gg

For the Isle of Man:

Isle of Man Information Commissioner

- Address: Isle of Man Information Commissioner, P.O. Box 69, Douglas, Isle of Man, IM99 1EQ
- Helpline: **+44 (0)1624 693 260**
- Website: inforights.im

FOR MORE INFORMATION

Call: **01737 233 288**

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

Or visit our website for further information: wearejust.co.uk/definedbenefit

Just is a trading name of Just Retirement Limited. Registered Office: Enterprise House, Bancroft Road, Reigate, Surrey, RH2 7RP. Registered in England and Wales number 05017193. Just Retirement Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.