



Royal London Financial Broker Privacy Notice

This notice describes how we collect, store, use and share personal information provided to us by you or by others on your behalf. It also explains the rights you may have in relation to the personal information that we hold about you.

1. Who we are

When we say 'we' or 'us' in this notice we're referring to Royal London Insurance Designated Activity Company, a company registered in Ireland (registration number: 630146).

2. What kinds of personal information can we hold about you?

We may collect and process the following:

- **personal information** - for example name and age;
- **contact information** – for example email address, fax and phone number(s). We may also have your home address, if you have provided this on the agency application forms or this is your correspondence address;
- **identification numbers** – for example your Central Bank of Ireland Financial Service Provider Reference Number;
- **information about your business** – for example business name, business address, remuneration address, phone, fax and email;
- **financial information** – for example bank account details and credit checks;
- **contractual information** – for example details of your agency agreement with us and remuneration preferences;
- **transactional information** - details of the business you place with us or amendments to your clients' plans;
- **online information** – for example cookies and IP address (your computer's internet address), if you use our websites or tools;
- **audio or video recordings** – for example voice recording when you contact us, or CCTV footage if you visit our offices. Calls maybe recorded for training to help us continually improve our customer service and to ensure we have an accurate record of instructions;
- **employees', directors', partners' and principles' additional information** - for example, position at your firm, any other agencies you are or have been linked with and details of your professional standing such as any history of debt, fraud or other criminal offences.

When we collect your information, we'll let you know if any of it is optional.

3. How we use your personal information?

We use the information we obtain for a number of reasons:

- setting up and administering your agency
- completing any client quotes, applications, amendments or requests you make
- verifying your identity and preventing fraud
- researching Financial Brokers opinions and exploring new ways to meet your needs
- assessing and developing our products, systems, prices and brand
- fulfilling any legal or regulatory obligations
- sending you marketing information

- monitoring the use of our websites

4. Where do we get your information from?

Most of the information we receive comes directly from you. We may also get personal information about you from other sources:

- Central Bank of Ireland – we will get information from the Financial Services Register to check the authorisation and permissions of you and/or your firm;
 - credit reference agencies - to verify your identity and conduct a credit check when setting up new agencies and for ongoing due diligence checks. This is to meet our anti-money laundering obligations and to protect against other conduct risks;
- third party’ cookies - to collect information on how visitors use our website. Our [cookie policy](#) can give you more information;
- comparison services / portals - If you use a comparison service or portal to obtain premium quotations, product or client information, the portal provider will share your information with us as well as any other information that you input in the enquiry that you make;
- Companies Registration Office or other companies who provide access to financial accounts - if we need to verify information on directors, owners or your business;
- online resources - if we lose touch with you, we may search for information such as contact details online, so we can get back in touch.

5. What are our legal grounds for using your personal information?

We’ll only use your personal information when one of the lawful use conditions has been met.

Legal grounds	
Consent	Your personal information may be processed when we receive your consent which must be freely given, informed, specific, unambiguous and with a positive affirmative action. You may withdraw your consent at any time.
Necessary for the performance of a contract	To set up and administer your agency account in accordance with the Terms of Business for Intermediaries. If we lose touch we may source information such as contact details so we can get back in contact.
Necessary for compliance with a legal obligation	Where we have reporting obligations we disclose your information to regulatory and other authorities, e.g. Central Bank of Ireland, Data Protection Commission, the Revenue Commissioners, the Financial Services and Pensions Ombudsman.
Necessary to protect vital interests	We may disclose your information to An Garda Síochána or other authorities if we have serious concerns about your wellbeing.
At the request of the data subject prior to entering into a contract	To consider whether to accept a request to set-up an agency account with us (including associated due diligence and vetting processes), to consider suitable Commission Arrangements.
Necessary for legitimate interests	
We also use your information when we have a “legitimate interest” and that interest isn’t outweighed by your privacy rights. You have the right to object to any processing done under legitimate interests. We’ll re-assess the balance between our interests and yours, if we have a compelling reason we may still continue to use your information.	
Use of your information	Legitimate interest(s)
Assessing and developing our	We need to be able to identify groups of clients and advisers who might be interested in any new products or services.

products, systems, prices and brand	<p>We need to develop those products and services, and make sure they suit your clients' needs, that they are performing as expected and that our product charges are fair.</p> <p>We need to understand the business that we're selling to ensure we're reaching our target markets.</p> <p>We need to make sure we're treating your clients fairly and check the plans you recommend remain suitable for them.</p>
Researching our Financial Brokers' opinions and new ways to meet your needs	<p>We need to make sure our products are suitable for the intended audience and to identify gaps in the market.</p> <p>We need to see how many categories of Financial Brokers we have and to tailor our products and services accordingly.</p> <p>We need to make sure our communications are easy to understand and that our products are being sold to the correct audience.</p> <p>We need to make sure our research is efficient and connects with the right types of people, so we can be confident of any decisions we make based on the results.</p>
Marketing	<p>We need to grow and sustain our business and develop our brand.</p>
Managing risks to us and our mutual clients	<p>We process Financial Brokers' information in order to calculate our exposure to credit risk on indemnity commission.</p> <p>Where risk indicators are flagged, we may conduct extra checks as well as reviewing our own records.</p>
Monitoring the use of our websites	<p>We need to make sure that our websites are secure and work well.</p>

6. Who do we share your personal information with?

We share your personal information with:

- our staff on an as needed basis
- associated Royal London Group companies and distributors of our products
- our service providers and agents
- our professional advisers: auditors and legal advisers
- identity authentication
- Revenue Commissioners, Central Bank of Ireland, Data Protection Commission and other regulatory bodies
- market research agencies; Your network or service provider, if we have identified unethical behaviour

We sometimes use third parties located in other countries to provide support services. As a result, your personal information may be processed in countries outside the European Economic Area (EEA) with Service providers, research partners and administrators with operations based in India and the United States.

We always ensure all personal information is provided with adequate protection and all transfers of personal information outside the EEA are done lawfully.

7. Security

We recommend that you don't send anything confidential to us by unencrypted email. When appropriate, we use Transport Layer Security (TLS) or the Clearswift Managed Email Security Service to encrypt and/or protect our outgoing email traffic. We may change our Email Security Service provider at any time without notice and without changing the provision in this notice.

Once we receive your information, we use strict procedures and security features to protect your information from unauthorised access.

8. How long do we keep personal information for?

We'll keep your personal information for a reasonable period of time after your relationship with us has ended. Currently information relating to you in our Financial Broker records will normally be retained for 7 years after the end of your relationship with us. We keep underwriting and quote information for 10 years and pension scheme information for all payments in and out of the scheme are kept for seven years after the scheme closes.

9. What are my rights?

Your rights are outlined below. The easiest way to exercise any of your rights would be to contact our Data Protection Officer using the contact details below. We'll provide a response within 30 days, if not sooner. There's normally no charge for exercising any of your rights.

- access to your personal information
- correcting or adding to your personal information
- provide your data in a portable format
- object to the use of your personal information for legitimate interests
- objecting to direct marketing
- restrict the use of your personal information
- right to erasure

10. Right to complain to the supervisory authority

If you're unhappy with how we're using your information, you have the right to complain to the Data Protection Commission. We'd encourage you to contact us first, so we can help with your concerns.

The Data Protection Commission's office can be contacted by:

- Visiting their website: www.dataprotection.ie
 - Email: info@dataprotection.ie
 - Phone: +353 (0)57 8684800 or +353 (0)761 104 800
 - Write to: Data Protection Office, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23.
- Or**
21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland.

11. Changes to the way we use your information

If we want to use your personal information for a new purpose which we haven't previously told you about, we'll contact you to explain the new use of your information. We'll set out why we're using it and our legal reasons.

12. Changes to our privacy notice

Making sure that we keep you up to date with privacy information is a continuous responsibility and we keep this notice under review. We'll update our notice as changes are required.

13. Contact us

If you have any questions or comments regarding this privacy notice, or if you're not happy with the way Royal London uses your information, please contact us using the details below:

- Post: Royal London, 47-49 St Stephen's Green, Dublin 2.
- Email: GDPR@royallondon.ie
- Phone: 01 429 3333