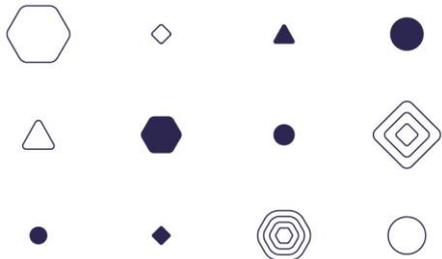


# Simplyhealth's Privacy Policy



## **Welcome to Simplyhealth's privacy policy**

Simplyhealth respects your privacy and is committed to protecting your personal data. This privacy policy explains in detail the way in which any personal data you provide to us is used and kept safe by Simplyhealth. It applies whenever we collect, store and use your personal data (including when you use our website or other digital platforms). We know there's a lot of information here, but we want you to be fully informed about your rights, and how Simplyhealth uses your data, so please take the time to read it.

You can click through to the specific areas in the policy, as set out below, or alternatively you can download a pdf version of the policy [here](#). We hope the following sections will answer any questions you have, but if not please do get in touch with us.

It's likely that we'll need to update this privacy policy from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

## **Who we are and about this privacy policy**

### **About Simplyhealth**

Simplyhealth is a group of companies made up of Simplyhealth Group Limited and the companies it owns and controls. For simplicity throughout this policy, 'we' and 'us' means Simplyhealth. Depending on which of our products and services you ask us about, buy or use, different companies within Simplyhealth will process your information. For a full and up-to-date list of the Simplyhealth group of companies that handle your personal data, please [click here](#).

### **About this privacy policy**

This privacy policy explains what information we may collect about you, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights in respect of your personal data.

So you are fully aware of how and why we are using your data, it is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions. These additional documents are intended to complement this privacy policy.

Our websites may include links to third-party platforms, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave any of our website, we encourage you to read the privacy policy of every website you visit.

## **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender
- **Contact Data** includes billing address, email address and telephone numbers
- **Financial Data** includes bank account details and details about your payments
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses
- **Usage Data** includes information about how you use our websites, products and services
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data is not considered personal data because it does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. If we combine Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **How is your personal data collected?**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your personal information by filling in forms or by corresponding with us by post, phone (we may record or monitor phone calls to make sure we are keeping to legal rules, codes of practice and internal policies, and for quality assurance purposes), email or otherwise. This includes personal data:

- You provide when you:
  - Apply for our products or services
  - Create an account on our websites
  - Subscribe to our service or publications

- Request marketing to be sent to you
- Enter a competition, promotion or survey
- Give us some feedback or comments on the services we provide
- Provided by a family member, or someone else acting on your behalf
- We collect from :
  - Our partners, in relation to your products or services, such as people providing you with apps, medical treatment, dental treatment or health assessments
  - Organisations who carry out customer-satisfaction surveys or market research on our behalf, or who provide us with statistics and other information (for example, about your interests, purchases and type of household) to help us to improve our products and services
  - Sources which are available to the public, such as the edited electoral register or social media

If we provide you with health plan products and services, we may collect information from:

- The main member, if you are a dependant under a family policy
- Your employer, if you are covered by a policy your employer has taken out
- Brokers and other agents (this may be your broker if you have one, or your employer's broker if they have one)
- Other third parties we work with, such as agents working on our behalf, other insurers and reinsurers, actuaries, auditors, solicitors, translators and interpreters, tax advisers, debt-collection agencies, credit-reference agencies, fraud-detection agencies (including health-insurance counter-fraud groups), regulators, data-protection supervisory authorities, health-care professionals, other health-care providers and medical-assistance providers
- Your employer, if you are covered by a contract for services your employer has taken out or if we are providing occupational health services
- Those paying for the products or services we provide to you, including other insurers, public-sector commissioners and embassies

**Automated technologies or interactions.** As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

## How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into, or have entered into with you
- Where it is necessary for our legitimate interests\* and your interests and fundamental rights do not override those interests

*\* **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for*

*activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.*

- Where we have a legal or regulatory obligation to use your personal information, for example, when our regulators, the Prudential Regulatory Authority, (PRA), the Financial Conduct Authority (FCA) or the Information Commissioner's Office (ICO) ask us to maintain certain records of any dealings with you
- Where we need to use your personal information to establish, exercise or defend our legal rights, for example when we are faced with any legal claims, or where we want to make any claims ourselves
- Where we need to use your personal information for reasons of substantial public interest, such as investigating fraudulent claims and carrying out fraud, credit and anti-money laundering checks
- Where we have a specific legal exemption to process sensitive personal data for insurance purposes. This exemption applies where we need to process your health data
- Where we have an appropriate legitimate business need to use your personal information such as maintaining our business records, developing and improving our products and services, all whilst ensuring that this business need does not interfere with your rights and freedoms and does not cause you any harm
- Where we need to use your sensitive personal information such as health data because it is necessary for your vital interests, an example would be a life or death matter

**Purposes for which we will use your personal data**

We have set out below, in a table, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note, that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your product including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) paying claims to you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)  (c) Necessary for reasons of substantial public interest
To manage our relationship	(a) Identity	(a) Performance of a contract with you

with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(b) Contact (c) Profile (d) Marketing and Communications	(b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make marketing suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Consent, where the individual has given clear consent for us to process their personal data for a specific purpose  Necessary for our legitimate interests (to develop our products/services and grow our business)

## **Opting out**

You can ask us to stop sending you marketing messages at any time by contacting us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, product experience or other transactions.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

## **Automated decision-making and profiling**

Automated individual decision making is a decision made by automated means without any human involvement. Sometimes we may use automation to evaluate information about you, which may include, to determine whether an application for a product is accepted by us, or to understand claiming behaviour and patterns or to tailor our services to provide you with a more efficient, consistent and fair service.

Automated individual decision-making does not have to involve profiling (automated processing of your information to help us evaluate certain things about you), although it often will do.

By law, we must tell you about automated decision-making and profiling. This is because you have rights in relation to automated decision-making and profiling. If you want to know more about this please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

As best practice:

- We carry out a data protection impact assessment (DPIA) to consider and address the risks before we start any new automated decision-making or profiling
- We tell our customers about the profiling and automated decision-making we carry out, what information we use to create the profiles and where we get this information from
- We use anonymised data in our profiling activities

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for those purposes set out in table 'Purposes for which we will use your personal data':

### **Internal Third Parties**

Other companies within Simplyhealth acting as joint controllers or processors and who provide IT and system administration services and undertake leadership reporting.

### **External Third Parties**

- Service providers acting as processors who provide IT and system administration services
- Professional advisers acting as processors or joint controllers based in the United Kingdom including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers
- The Financial Ombudsman Service and regulatory authorities such as the Financial Conduct Authority, the Information Commissioner's Office and the Prudential Regulation Authority

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## International transfers

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield

Please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you would like more information about how long we will keep your information for, please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- **Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Data protection contacts

If you have any questions, comments, complaints or suggestions regarding any aspect of your personal data or this privacy policy, please contact our Data Protection Officer [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk) or by post at:

The Data Protection Officer  
Simplyhealth  
Hambleton House  
Waterloo Court  
Andover  
Hampshire  
SP10 1LQ.

You have a right to make a complaint at any time to your local privacy supervisory authority. Simplyhealth's main establishment is in the UK, where the local supervisory authority is the Information Commissioner's Office (ICO). You can also contact the Information Commissioner's Office using their online form: <https://ico.org.uk/global/contact-us/email/>

([www.ico.org.uk](http://www.ico.org.uk)), or by post at:

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

However we would appreciate the chance to address your concerns before you approach the ICO, so please contact us in the first instance.