

## How will my information be used and what are my rights?

### The Purpose of this notice

As part of our arrangement with you, Imperial Health Limited ("we", or "us", or "our") has certain obligations under current data protection laws. This notice will inform you of what personal information we collect, how that information is used, where it is transferred, and how you may view, amend or withdraw such information. You may be assured that we will treat all personal information as confidential and will not process it other than under the legal basis of legitimate interest. Steps will be taken to ensure that the information is accurate, kept up to date and not kept for longer than necessary. Measures will also be taken to safeguard against unauthorised or unlawful processing and accidental loss, destruction or damage to the information. The terms we use are compliant with current data protection laws governed by the Information Commissioners Office.

### What type of personal information will be processed?

We collect and process personal data about you for the purposes of providing advice, administration and management services, which are explained in more detail below. "Processing" could include obtaining, recording or holding information or data. "Personal data" is information which can identify you as a living individual. Common examples of personal data which may be collected and used by us in our day to day business activities include:

- Name;
- Date of birth;
- Gender;
- Marital status;
- Address;
- Telephone number and other contact details (including email addresses);
- Occupation; and
- Bank account and other financial details.

The information collected and processed may also contain "sensitive personal data" such as your physical or mental health or condition.

Please note that as with personal data, you have freedom of choice when it comes to your decision as to whether you provide us sensitive personal data. In addition to your right to request that we stop processing your personal data and sensitive personal data at any time, you have an opportunity to choose not to provide sensitive data to us at all.

You should however note that if you exercise this right or subsequently request that we stop processing all or part of your personal data and/or sensitive personal data, this could impact upon our ability to provide you with certain types of products and services and may ultimately result in us being unable to provide them to you at all.

### How will my personal data be collected or used?

We collect personal data from you to the extent necessary to provide advice, administrative and management services, and (subject to the provisions below) related marketing activities.

We may process your personal data and sensitive personal data for the following reasons:

- The administration, management and provision of advice in relation to financial services products;
- Our legal basis for processing is legitimate interest and activities including internal audit, accounting, business planning and proposed and actual transactions (including joint ventures and disposals of business); and Compliance with legal (including dealing with claims), regulatory and other good governance obligations.
- Your personal data has been shared with us from data partners who have direct contact with you already and where appropriate notice has been given for them to pass your information to us.

This list is not exhaustive and may be updated from time to time as business needs and legal requirements dictate. Some of the personal data that we maintain will be kept in paper files, while other personal data will be included in computerised files and electronic databases.

### Who might my personal data be shared with?

We may disclose your personal information to our business associates, agents and service providers for the purposes of providing services to you. Your information may be processed by service providers in a country outside the European Economic Area, which may not have the same standard of data protection as in the UK.

**Imperial Health Limited, FCA firm number 790765, Company Registration number 10979169.**

**Address – 47 Medlock Drive, Sheffield, S13 9BB**

**Tel: 0114 212 8808**

**[www.imperialhealthltd.co.uk](http://www.imperialhealthltd.co.uk)**

## How will my information be used and what are my rights?

We will ensure the appropriate safeguards are in place to protect your information.

Certain personal data will also be reported to government authorities where required by law and for tax or other purposes. Personal data may also be released to external parties as required by legislation, or by legal process, as well as to companies you authorise us to release your personal data to. We will not sell your personal data to any third party.

### Direct Marketing

We may wish to provide you with information about new products, services, promotions and other information in which we think you may be interested. We may send you such information by post or contact you by telephone; unless you have registered with the appropriate Preference Service (we would be grateful if you could let us know if this is the case). If you purchase a product or have received a quotation from us we may retain your details for future contact. If you do not want your information used for direct marketing purposes at any time, please contact our customer services department at Imperial Health Limited, 47 Medlock Drive, Sheffield, S13 9BB or telephone us on 0114 212 8808 to let us know and we will not send you any direct marketing.

### E-mail marketing

We would also like to provide you with the above information by e-mail. However, we appreciate that e-mail "spam" has become a problem in recent years. If you are a customer or you have previously asked us for information on our products,

- we may contact you regarding your purchase or other matters regarding transactions between us, or your customer relationship with us.
- we may send you information on our products by e-mail, unless you have asked us not to do so.
- we may also use your e-mail address to send you information about our products and services which we think may be of interest to you by way of informational e-mails, unless you have asked us not to do so.

If you decide at any time that you no longer wish to receive marketing e-mails from us please contact our customer services department at Imperial Health Limited, 47 Medlock Drive, Sheffield, S13 9BB or telephone us on 0114 212 8808.

### Your right to review, amend or withdraw your personal data

You have the right to review your personal data and sensitive personal data held by us and have any inaccurate information about you corrected or withdrawn. If you wish to do so, or to notify us of a change in your details, please contact The Data Protection Officer at Imperial Health Limited, 47 Medlock Drive, Sheffield, S13 9BB. You may be charged a fee (subject to the statutory maximum) for supplying you with such data.

### How to request that we cease processing your personal data

If at any time you wish us to cease processing your personal data or sensitive personal data, or contacting you for marketing purposes, please contact The Data Protection Officer at Imperial Health Limited, 47 Medlock Drive, Sheffield, S13 9BB.

### Your right to make a complaint to a supervisory authority

If at any time you wish to make a complaint regarding the processing of your personal data you can do so by visiting <https://ico.org.uk/make-a-complaint/> or contact the Information Commissioner's Office (ICO) helpline on 0303 123 1113.

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