

# UK Privacy Notice



# Privacy Notice

MetLife strongly believes in protecting the confidentiality and security of your personal data. This document is referred to as our “Privacy Notice” and describes how we use the personal data that we collect and receive about you.

Our Privacy Notice contains some terms which you may need help understanding. These terms are listed in the Glossary at the end of our Privacy Notice.

## How to get more help

If you want help with our Privacy Notice or have questions about it, please contact our Data Protection Officer whose contact details are below:

Data Protection Officer, MetLife, Invicta House, Trafalgar Place, Brighton BN1 4FR

e-mail: [DataProtectionUK@MetLife.com](mailto:DataProtectionUK@MetLife.com)

If you are unhappy about any aspect of the way we collect, share or use your personal data, we would like you to tell us. You can contact us using the details above.

If you are not happy with our response, you have a right to complain to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Telephone: 0303 123 1113 or on its website at [www.ico.gov.uk](http://www.ico.gov.uk).

## What are your rights?

We have set out a summary of your rights regarding your personal data below. Further details about your rights are contained in the ‘Your Privacy Rights’ page:

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about your rights and how we use your personal data. This is why we are providing you with details about your information in this Privacy Notice.
2. The right of access	You have the right to obtain access to your personal data (if we are processing it), and other certain information (similar to that provided in this Privacy Notice). This is so you are aware and can check that we’re using your personal data in accordance with data protection law. For more information, see ‘Accessing your information’.

Rights	What does this mean?
3. The right to rectification	You are entitled to have your personal data corrected if it's inaccurate or incomplete. For more information, see 'Correcting your information'.
4. The right to erasure	This is also known as 'the right to be forgotten' and enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep using it. This is not an absolute right to erasure. We may have a right or obligation to retain the information, such as where we are under a legal obligation to do so or have another valid legal reason to retain it. For more information, see 'Erasing your information'.
5. The right to restrict processing	In certain situations you have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future. This may affect our ability to provide services to you. For more information, see 'Restricting processing of your information'.
6. The right to data portability	You have rights to obtain a copy of some of the personal data that we hold on you and reuse or share it for your own purposes. For more information, see 'Taking your personal data with you'.
7. The right to object	You have the right to object to certain types of processing, including processing for direct marketing (which we do only with your consent). For more information, see 'Objecting to processing'.

## Who we are

The following companies are referred to as “**MetLife**” in this Privacy Notice:

- MetLife Europe, d.a.c. - One Canada Square, Canary Wharf, London, E14 5AA;
- MetLife Europe Services Limited - One Canada Square, Canary Wharf, London, E14 5AA; and
- MetLife Pension Trustees Limited - One Canada Square, Canary Wharf, London, E14 5AA.

MetLife is the controller of your personal data.

## How we contact you

We may contact you through one or more of the following communications channels: by telephone, mail, email, text (SMS) message, instant messaging or other electronic means.

We record all telephone calls and other electronic communications to monitor our services and for audit and training purposes. We store call and other communication recordings securely in accordance with our retention policies and applicable laws. Access to those recordings is restricted to those individuals who have a need to access them for the purposes set out in this notice.

## What we learn about you

The types of personal data we hold may include your:

- name;
- contact details including email details and phone numbers;
- policy number;
- financial personal data including account details for direct debits;
- national insurance number;
- age or date of birth;
- gender, occupation;
- recreational activities or sports;
- details of any criminal convictions; and
- special categories of personal data.

## How we learn about you

What we know about you is mostly provided by you when you first contact us (or where your employer first contacts us if we provide group insurance to your employer) and whilst we continue to provide insurance to you or your employer. You may provide us with personal data at various times and via various communication channels including phone, email and text, for example when you:

- request information about, or apply for, one of our insurance products or services;
- register to access your financial account information;
- ask to have a MetLife representative contact you;
- participate in any MetLife promotion or survey;
- make a policy amendment or claim; or
- make a complaint.

Additionally, we may be provided with the types of personal data listed above in the section 'What we learn about you' by:

- your employer if we are providing insurance cover for its group employee benefits scheme; and
- sponsors who provide us with marketing lists which include your personal data where you have explicitly consented to this use.

We may need to check the personal data we have about you to make sure it is correct and complete with other sources such as your relatives (particularly if you are a minor), employers, health care providers, credit reference agencies, other insurers, financial advisers, other financial services providers, consumer reporting and anti-fraud agencies. Some of our sources may provide us with special categories of personal data about you and/or reports relating to you.

## Why we need your personal data

We use the personal data we have about you to:

- provide insurance to you and for activities relating to that insurance including claims and renewals;
- check your identity and to comply with our legal and regulatory requirements;
- provide you with the information, products and services that you request from us;
- administer our relationship with you whilst we provide insurance cover to you or your employer ;
- check your instructions to us;
- analyse, assess and improve our services to customers;
- investigate any complaint you may make;
- provide evidence in any dispute or anticipated dispute between you and us;
- provide you with marketing information where you have consented to direct marketing (please also see the section headed 'Direct Marketing' below);
- notify you about changes to our insurance products and services;
- train our staff;
- monitor the quality of our insurance products and services;
- ensure that content from our website is presented in the most effective manner for you;
- aggregate it on an anonymous basis with other data for data analytical and reporting purposes; and
- provide you with access to secure areas of our website.

## The legal basis for our processing of personal data

The legal basis for our processing of personal data (including any sensitive data, such as data concerning your health) will depend on why we process your information.

Where you wish to enter into or have signed a contract with us to provide insurance products and services, we process your personal data to enable us to enter into and perform the contract.

Where you use our website, we process your personal data collected by using cookies in accordance with our cookie policy. A copy of our cookie policy can be found on our website.

We may also need to process your personal data to comply with our legal obligations including in relation to performing anti-money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation.

We also have a legitimate interest to process your personal data for:

- claims analysis including to assist in our pricing;
- the purposes of underwriting and administering your policy and dealing with any claims under it which may include data sharing with other companies within the MetLife group, intermediaries and any third parties engaged by us to help us provide insurance products and services to you (please also see 'How we disclose your personal data');
- communications purposes;
- marketing analytics and feedback to enable us to optimise the marketing of our products and services;
- ongoing management of our relationship with you and to maintain contact with you (e.g. providing annual updates);
- our internal business purposes which may include business and disaster recovery, document retention/storage, IT service continuity (e.g. back-ups and helpdesk assistance) to ensure the quality of the insurance products and services we provide to you;

- corporate transactions (please also see the section below ‘How we treat personal data on a business sale’);
- portfolio analysis and experience studies but only in an anonymised form to enable us to improve the insurance products and services we offer to customers.

Where you have given us your permission to do so, we use relevant personal data to enable us to provide you with information about products, special offers and services that may be of interest to you.

We always seek your consent to process personal data where we are legally required to do so.

## How we disclose your personal data

We may use and share your personal data with other companies in the MetLife group to:

- help us evaluate your request for insurance products or services;
- help us administer your insurance policy and process claims and other transactions;
- confirm or correct what we know about you;
- help us prevent fraud, money laundering, terrorism and other crimes by verifying what we know about you;
- perform research for us;
- comply with the law for example, to enable sharing your personal data with the police or fraud agencies where necessary to prevent fraud;
- audit our business;
- provide you with information about MetLife, our products, special offers and services that may be of interest;
- fulfil other business purposes such as product development and website administration.

Depending upon the product you have with us, we may share your personal data with third parties who help us provide insurance products and services to you. For example we may share your personal data:

- to comply with the law or rules of any regulatory body whose rules apply to MetLife;
- with credit reference agencies, police, consumer reporting and fraud prevention agencies to check your identity, credit history and whether you have any criminal record when we process an application or claim;
- with other insurers, financial services providers and claims investigation firms to prevent and detect fraudulent and exaggerated claims;
- with third party administrators and service providers to assist us in the administration of your insurance policy or any claim you may make under it;
- with companies that print and distribute mailings or, where you have provided your consent, with companies that perform marketing purposes on our behalf;
- with your financial advisor(s) so that they can advise and provide their services to you;
- with reinsurers who help to manage our business and reduce the risks associated with underwritten insurance policies by spreading our risks across alternative institutions;
- with insurance brokers who help us arrange insurance for you;
- with health professionals including doctors and medical centres where we are providing health insurance to you; and
- If your employer holds a Group Income Protection Policy with us and you make a claim, we may share your personal data (including data concerning your health) with your employer in connection with your claim and its progress.

When we share your personal data with third parties who perform business services for us, we require them to take appropriate steps to protect your personal data and only use the personal data for the purpose of performing those services.

Other reasons we may share what we know about you include:

- enforcing our agreement with you;
- protecting the rights, property, or safety of MetLife, our customers, or others;
- doing what a court, regulator or government agency requires us to do, for example, complying with a search warrant or court order or acting as required or permitted by applicable law or regulation; and
- giving personal data to the government so that it can decide whether you may get benefits that it will have to pay for.

### **How we treat personal data on a business sale**

From time to time, we may sell one or more of our businesses or product/service lines to another provider, and your personal data may be transferred as a part of that purchase or sale. Any new provider will continue to use your personal data for the same purposes unless you are notified otherwise. We may also share your personal data with prospective purchasers of our business and their professional advisers, but ensure that appropriate safeguards are in place to protect your information in such circumstances.

### **How we protect your personal data**

The security and confidentiality of your personal data is extremely important to us. We have technical, administrative, and physical security measures in place to:

- protect your personal data from unauthorised access and improper use;
- secure our IT systems and safeguard the information; and
- ensure we can restore your data in situations where the data is corrupted or lost in a disaster recovery situation.

Where appropriate, we use encryption or other security measures which we deem appropriate to protect your personal data. We also review our security procedures periodically to consider appropriate new technology and updated methods.

### **Direct marketing**

We may offer you the opportunity to receive marketing from us in relation to products, special offers or services that we believe may be of interest to you. We normally send direct marketing by email if we have your email address, but may choose to contact you via other methods, if you have provided your consent for us to market to you using these methods.

If you would like us to stop marketing to you, we offer simple ways to do this. Whenever you receive direct marketing you are told how you can unsubscribe. You can also select the 'unsubscribe' option on any email marketing communications we send to you.

### **Where we transfer your information?**

We may transfer your personal data to other countries. The countries in the European Economic Area are considered to provide the same level of protection to personal data as the UK does. Where we transfer personal data or share it with others outside the European Economic Area, we ensure that we and those persons or companies who we transfer it to agree to protect it from improper use or disclosure, in accordance with data protection law by model clauses or other appropriate mechanisms. Companies outside the European Economic Area with whom we may share your personal data include our other group companies, IT providers and other suppliers necessary for the performance of the insurance contract.

## How long will we keep your information?

We will typically need to retain your information throughout the duration of our relationship with you, and potentially beyond that point to comply with all applicable laws and privacy legislation to which we are subject. Further details can be provided upon written request.

We safely and securely destroy data which we no longer need to keep in accordance with our data retention policies.

When we continue to use data for statistical or research purposes, we ensure that the data is anonymised so that you cannot be identified by or from it in any way.

## How will you know if we amend this Privacy Notice?

We may amend this Privacy Notice at any time. If we make any material change in how we collect your personal data, or how we use or share it, we will prominently post notice.

## Governing law

This Privacy Notice is governed by English law.

# Your Privacy Rights

This section explains your rights in relation to your personal data in more detail. The various rights are not absolute and are subject to certain exceptions or qualifications.

Further information and advice about your rights can be obtained from the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 or on its website at [www.ico.gov.uk](http://www.ico.gov.uk).

You are entitled to receive your personal data free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the personal data for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll let you know.

In order to exercise any of the rights described contact us at **DataProtectionUK@MetLife.com**.

## What can you request access to?

You have the right to:

- receive confirmation from us that your personal data is being processed;
- access to your information; and
- certain other personal data (most of which should be in our personal data notice anyway).

You can request copies of paper and electronic records about you that we hold, share or use. To deal with your request, we can request proof of identity and enough personal data to enable us to locate the personal data you request.



## When will access not be provided?

We can only provide you with your information, not personal data about another person. Also, where access would adversely affect another person's rights, we're not required to provide this. Due to legal privilege, there are some records we are not able to share in connection with a claim or legal proceeding.

Please clearly set out in your access request the personal data that you're requesting. If this is not clear, we may come back to you to ask for further personal data by way of clarification.

## Correcting your information

You have the right to obtain from us without undue delay the correction of inaccurate personal data concerning you. If you tell us that the personal data we hold on you is incorrect, we will review it and if we agree with you, we will correct our records. If we do not agree with you we will let you know. If you wish, you can tell us in writing that you believe our records still to be incorrect and we will include your statement when we give your personal data to anyone outside MetLife. You can contact us using the details in the section above headed 'Obtaining further personal data from us'.

You may also have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Whether or not this is appropriate in any particular case depending on the purposes for which your personal data is being processed.

We need to notify any third parties with whom we've shared your personal data that you've made a rectification request (see "Why we need your personal data"). We will take reasonable steps to do this, but if it is not possible or may involve disproportionate effort we may not be able to do this or ensure they rectify the personal data they hold.

### How You Can See and Correct Your Information

Generally, we let you see the personal data that we hold about you, or take steps to correct any inaccurate information, if you ask us in writing.

Due to legal privilege, there may be some records we are not able to share in connection with a claim or legal proceeding.

## Erasing your information

### When can you request erasure?

Subject to the section below "When can we refuse erasure requests?", you have a right to have your personal data erased, and to prevent processing, where:

- the personal data is no longer necessary for the purpose it was originally collected/processed;
- you withdraw consent (where previously provided and required for us to process such data);
- you object to the processing and we do not have a legitimate interest in processing your personal data;
- we've been processing your personal data in breach of data protection laws; or
- the personal data has to be erased in order to comply with a legal obligation.

### When can we refuse erasure requests?

The right to erasure does not apply where your information is processed for certain specified reasons, including for the exercise or defence of legal claims.

More importantly, if we have to erase your data we are not able to provide you with insurance or our other products and services if we need to process the erased data in connection with their administration, management or provision.

### Do we have to tell other recipients of your personal data about your erasure request?

Where we have provided the personal data you want to be erased to third parties (see "Why we need your personal data"), we need to inform them about your erasure request, so they can erase the personal data in question. We will

take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

It may also be that the recipient is not required/able to erase your personal data because one of the exemptions above applies – see “When can we refuse erasure requests?”.

## Restricting processing of your information

### When is restriction available?

You have the right to restrict the processing of your personal data:

- where you disagree with the accuracy of the information, we need to restrict the processing until we have verified the accuracy of the information;
- when processing is unlawful and you oppose erasure and request restriction instead;
- if we no longer need the personal data but you need this to establish, exercise or defend a legal claim; or
- where you have objected to the processing in the circumstances detailed in paragraph (a) of “Objecting to processing”, and we are considering whether those interests should take priority.

### Do we have to tell other recipients of your personal data about the restriction?

Where we have disclosed your relevant personal data to third parties, we need to inform them about the restriction on the processing of your information, so that they don’t continue to process this.

We will take reasonable steps to do this, but this may not always be possible or may involve disproportionate effort.

We will also let you know if we decide to lift a restriction on processing.

## Taking your personal data with you

### When does the right to data portability apply?

The right to data portability only applies in the following circumstances where personal data has been provided to us in connection to the performance of a contract of insurance:

- to personal data you’ve provided to us (i.e. not any other information);
- where the processing is based on your consent or for the performance of a contract; and
- when processing is carried out by automated means.

### When can we refuse requests for data portability?

We can refuse your data portability request if the processing does not satisfy the above criteria. Also, if the personal data concerns more than one individual, we may not be able to transfer this to you if doing so would adversely affect that person’s rights.

## Objecting to processing

You can object to processing in the following circumstances:

- (a) Legitimate interests

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on legitimate interests.

If we can show compelling legitimate grounds for processing your personal data which override your interests, rights and freedoms, or we need your personal data to establish, exercise or defend legal claims, we can continue to process it. Otherwise, we must stop using the relevant information.

(b) Direct marketing

You can object at any time to your personal data being used for direct marketing purposes (including profiling related to such direct marketing).

If you sign up to receive newsletters or other e-mail messages from us, you can opt-out at any time free of charge by clicking the unsubscribe link at the bottom of the message. You may also choose to opt-out from receiving marketing materials from us by contacting us using the details in our Privacy Notice under the section headed 'Obtaining further personal data from us'.

## Glossary

**Controller** is the person or organisation which decides the purposes and means of the processing of personal data either on its own or with others.

**Credit Reference Agencies** are companies which collect personal data relating to the credit ratings of individuals and make it available to organisations such as insurers and banks.

**Fraud Prevention Agencies** collect, maintain and share, personal data internationally on known and suspected fraudulent activity.

**Insurance Brokers** find insurers who are prepared to provide insurance cover to match a customer's requirements.

**Model clauses** are standard contractual clauses which have been approved by the European Commission as providing adequate safeguards to enable personal data to be transferred outside the European Economic Area.

**Personal data** is any personal information relating to an individual who can be identified, directly or indirectly, by reference to that information.

**Processing** means any operation or set of operations which is performed on personal data such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, erasure or destruction.

**Profiling** means any form of automated processing of personal data where personal data is used to analyse or predict certain personal aspects e.g. an individual's economic situation, health, personal preferences, interests, reliability or behavior.

**Reinsurers** provide insurance to insurance companies to enable them to manage their risk.

**Special categories of personal data** are types of personal data which might show a person's race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, details about their health and any genetic or biometric data.

**Sponsors** are third parties who provide us with lists of names and contact details for marketing purposes.

[www.metlife.co.uk](http://www.metlife.co.uk)

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