

JOHN LAMB HILL OLDRIDGE LIMITED – PRIVACY NOTICE

INTRODUCTION

This Privacy Notice will help you understand what data we collect from you, why we collect it and what we do with it. This notice explains how we store and use your personal data when you use or interact with our website, or where we otherwise obtain or collect your personal data.

This notice also explains how we protect any personal data we obtain directly or passively from you or which we obtain indirectly from other sources.

We have done our best to present the information in this notice in clear and plain language, and we have structured it in a way to allow you to quickly find the information that is most important to you.

We reserve the right to change our Privacy Notice from time to time. This Privacy Notice was last modified on 9th February 2021.

PRIVACY NOTICE

We are committed to keeping your personal data safe and to ensuring the integrity and security of any personal data we may process.

You should read this Privacy Notice very carefully as it contains important information on the way in which we will process your personal data, in particular:

- The personal data we collect about you
- Our legal basis for processing your personal data
- What we do with your personal information
- Who your personal data may be shared with
- Your rights as a data subject under the Data Protection Regulation.

WHO WE ARE

John Lamb Hill Oldridge Ltd is a company incorporated and registered in England with company number 09408666. John Lamb Hill Oldridge is the controller of personal data relating to individuals and prospective clients for the purposes of providing products and services, relationship management, marketing and business development.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

We collect personal data about you when you apply to buy our goods and/or services. This data will relate to personally identifiable information such as name, date of birth, contact information such as telephone number, address, email, and financial information such as current/savings account numbers, income and expenditure details, savings/investments values and any other data contributing to your wealth. We may also process special categories of personal data (sensitive data) such as data about your health or medical conditions. Prior to processing special category data, we will gain your informed and explicit consent.

PERSONAL DATA PROVIDED IN RESPECT OF THIRD PARTIES

You acknowledge that you will have the authority to provide any third party's personal data to us and agree to share this Privacy Notice with such third parties and inform them of the personal data you have shared with us. Where this includes special category data (sensitive data such as health or medical conditions), we will require the informed, explicit consent of the third party.

OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We may rely on a number of legal basis for collecting and further processing your personal data, which are:

- Contractual Necessity
- Legal Obligation
- Legitimate Interest
- Consent.

CONTRACTUAL NECESSITY

We collect personal information about you when you request our products or services. We will ask you to provide some information about yourself.

We will also collect personal data for the purposes of the performance of a contract with you, such as:

- Providing you with our products
- Providing you with access and use of our services
- Administering your account with us
- Communicating with you about our products and services.

LEGAL OBLIGATION

We may also process your personal information to allow us to comply with certain legal obligations to which we are subject. We will also work co-operatively with the national data protection authority, the Information Commissioner's Office, in relation to any data protection matters.

LEGITIMATE INTEREST

We may use your personal data for our legitimate business interests, whilst carefully considering and balancing any potential impact on you and your rights as a data subject under the relevant data protection laws.

This may include processing your personal data to allow us to provide the best services and customer experience and to ensure our service remains relevant and tailored to your needs.

We will always ensure that our legitimate interests will never override your rights and freedoms under the data protection laws.

As an example, we may rely on our legitimate interest to process your personal data for the following purposes:

- For Direct Marketing, relating to products and services that are compatible with the original purpose for which we gained the information
- To communicate with you, including newsletters and marketing materials
- To communicate important updates about our products or services, which we think may be of interest to you

- For evidential purposes to effectively manage and maintain records of our relationships/communications with you
- For business development related activity such as contacting you by telephone or email to arrange meetings with our experts in relation to work or knowledge sharing
- To enhance, modify, personalise or otherwise improve our services and communications for your benefit
- To determine the effectiveness of promotional campaigns to inform marketing strategy.
- To perform statistical and other analysis on the personal data we collect, to help us understand and improve on how people use our products or services.
- If you are a prospective client, we may carry out searches of your name on publically available search engines (such as Google) and on other publically available websites (such as LinkedIn) for the purposes of getting to know your background before speaking with you and discussing relevant products or services.

Please note, you have the right to object to the processing for which we rely on legitimate interest as the legal basis. You can do so and update your marketing preferences by emailing the Data Controller or mail@jlho.co.uk

CONSENT

We are required to gain your explicit consent prior to processing your sensitive data.

Where we require such consent, we will provide you with sufficient information to allow you to make an informed decision. We will ensure that we only gain consent via a clear and affirmative act, freely given by you that indicates your consent to specific purposes.

You have the right to withdraw your consent at any time and can do so by emailing the Data Controller or mail@jlho.co.uk

YOUR RIGHTS AS A DATA SUBJECT

As a data subject you can exercise certain rights in relation to the processing of your personal data, under the relevant data protection regulation. These are:

- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- The right to lodge a complaint with the ICO
- The Right to Understand the Source of data gained indirectly.

If you want more information about your rights, you can find it below.

Your Right	What this means	How you can exercise this right
<p>The Right of Access</p>	<p>You have the right to confirmation on whether or not we are processing your personal data and, where that is the case, access to that data, including the following information:</p> <ul style="list-style-type: none"> ● The purpose of the processing ● The recipients or categories of recipient to whom the personal data have been or will be disclosed. ● The envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period. <p>We shall provide a copy of the personal data being processed free of charge.</p> <p>We will respond to your request within one month of your request.</p> <p>We will advise any other recipients to whom the personal data has been disclosed.</p>	<p>You can request this information at no charge from us by emailing mail@jlho.co.uk or by telephoning 0207 633 2222.</p>
<p>The Right to Rectification</p>	<p>You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you.</p> <p>Taking into account the purposes of the processing, you also have the right to have incomplete personal data completed, including by means of providing a supplementary notice.</p> <p>We will respond to your request within one month of your request.</p> <p>We will advise any other recipients to whom the personal data has been disclosed.</p>	<p>You can request this information at no charge from us by emailing mail@jlho.co.uk or by telephoning 0207 633 2222.</p>

The Right to Erasure

In some circumstances you have the right to have your personal data erased and no longer processed where:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed
- You withdraw consent on which the processing is based, and where there is no other legal ground for the processing
- You object to the processing and there are no overriding legitimate grounds for the processing
- The personal data has been unlawfully processed
- The personal data has to be erased for compliance with a legal obligation.

We will respond to your request within one month of your request.

We will advise any other recipients to whom the personal data has been disclosed.

You can request this information at no charge from us by emailing mail@jlho.co.uk or by telephoning 0207 633 2222.

The Right to Restrict Processing

You have the right to obtain the restriction of processing where one of the following applies:

- The accuracy of the personal data is contested, for a period enabling the verification of the accuracy of the personal data
- The processing is unlawful and you object to the erasure of the personal data and request the restriction of their use instead
- We no longer need the personal data for the purposes of the processing, but are required by you for the establishment, exercise or defence of legal claims
- You have objected to processing pending verification of whether our legitimate grounds override yours.

Where you have obtained restriction of processing you have the right to be informed by us before the restriction of processing is lifted.

We will respond to your request within one month of your request being received.

We will advise any other recipients to whom the personal data has been disclosed.

You can request this information at no charge from us by emailing mail@jlho.co.uk or by telephoning 0207 633 2222.

<p>The Right to Object</p>	<p>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 our legitimate interest.</p> <p>You also have the right to object to processing for direct marketing purposes. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.</p> <p>We will respond to your request within one month of your request being received.</p> <p>We will advise any other recipients to whom the personal data has been disclosed.</p>	<p>To object to us processing your personal data for direct marketing or other legitimate interest purposes, please email mail@jlho.co.uk.</p> <p>This may take a maximum of 48 hours.</p>
<p>The Right to Data Portability</p>	<p>You have the right to receive the personal data concerning you, which you have provided to us and have the right to transmit those data to another controller without hindrance from us to which the personal data have been provided, where:</p> <ul style="list-style-type: none"> ● The processing is based on consent or on a contract and ● The processing is carried out by automated means. <p>Where feasibly possible, you also have the right to have the personal data transmitted directly to another controller.</p> <p>We will respond to your request within one month of your request being received.</p>	<p>You can request this information at no charge from us by emailing mail@jlho.co.uk or by telephoning 0207 633 2222.</p>
<p>The Right to lodge a complaint with the ICO</p>	<p>You have the right to lodge a complaint with the Information Commissioner's Office (ICO).</p>	<p>The contact details of the ICO are: Website: ico.org.uk Helpline: 0303 123 1113</p>
<p>The Right to Understand the Source of data gained indirectly.</p>	<p>You have the right to be informed of the source of any personal data that are not collected directly from you.</p>	<p>You can request this information at no charge from us by emailing mail@jlho.co.uk or by telephoning 0207 633 2222.</p>
<p>The right to be advised of appropriate safeguards for the transfer of personal data to a third country</p>	<p>Where personal data are transferred to a third country (outside of the EU) or to an international organisation, you shall have the right to be informed of the appropriate safeguards relating to the transfer.</p>	<p>We will advise you of this prior to any such processing taking place.</p>

HOW WILL WE USE YOUR PERSONAL DATA?

We will only process your personal data where we have a legal basis to do so. We use data collected to communicate with you and to offer you our products or services. We may use your data to improve or maintain the services we offer to you. We will never share your data with any other third party, other than those stated in this policy, nor use your data for any other purpose, unless we firstly gain your explicit consent to do so.

You have the right to restrict the processing of your personal data. You have the ability to choose which promotional communications you wish to receive and how you would like to receive them.

WHO WE SHARE YOUR DATA WITH – THIRD PARTY PROVIDERS

We share your data with approved third-party providers that have adequate data protection measures in place that align with the requirements of the data protection regulation, such as;

- The providers of our back office client management systems
- The providers of quote engines and research tools
- Smartsearch Limited who are a credit reference agency we may use to verify your identity
- Medical Screening Solutions Limited who we use to gather medical information for life insurance applications
- Three Sixty Services Ltd who we use for compliance and regulatory support.

WHO WE SHARE YOUR DATA WITH – INSURERS, PROFESSIONALS, TRUSTED ADVISORS, TRUSTEES, TRUST ADMINISTRATORS AND FAMILY

In order for us to act for you for the purposes of arranging your life insurance, we obtain your personal data from, and share it with, a number of third parties listed below. In particular, this data sharing takes place to ensure that we can facilitate and deal with the following:

- your inquiries for life insurance, including obtaining initial quotes from insurers;
- your request to buy life insurance, including underwriting by insurers to provide you with specific offers for life insurance; and
- assigning your policy into trust once you have bought your life insurance. The categories of third parties are listed below:
 - **Your professional advisers** – we may obtain your personal data directly from your professional advisers who act on your behalf in connection with your life insurance policy. These professionals can include your solicitors, accountants and other trusted advisers. The personal data we obtain and share is limited to what is necessary in order to facilitate the provision of your life insurance policy and any additional cover or changes that you may require in the future after purchasing your policy. We will not share any special category data (sensitive data such as health or medical conditions) with your professional advisers. We recommend that you review your professional advisers' own privacy notices to understand how they will use and share your personal data.
 - **Insurance companies** – we share your personal data with insurance companies or their reinsurers for the express purpose of the arrangement and administration of your life insurance product. Once you have decided to buy life insurance, the sharing of your personal data with insurance companies is based on having first obtained your consent through our Medical Consent Form. The personal data shared will include special category data (sensitive data such as health or medical conditions) relating to your current insurance application. Subject to obtaining your consent, we may also obtain such special category data from insurance companies that relate to your past applications for insurance policies (Please see Appendix A for list of insurers)
 - **Trustees and trust administrators** – once you have purchased your life insurance policy, it will typically be assigned into trust. We will share your personal data on an on-going basis with your trustees and trust administrators, who will be responsible for looking after and managing your life insurance policy on behalf of your beneficiaries until such time they are due to be paid. We will not share any special category data (sensitive data such as health or medical conditions) with your trustees or trust administrators.
 - **Your immediate family members** – We may share your personal data with your immediate family members (i.e. spouse or children) for the purposes of inquiries around your life insurance policy and to inform the purchase of their own life insurance policies.

TRANSFERS OF YOUR PERSONAL DATA

In limited circumstances, your personal data may be transferred outside of the UK & EEA depending on the location of the third parties we share your personal data with. We will first inform you any such transfers and ensure that we obtained your consent to legitimise such transfers in accordance with relevant data protection laws.

RETENTION PERIOD

We will only keep personal data for as long as necessary for the purposes for which it was gained and only where we continue to have a legal basis for doing so. We will review the personal data we hold on you in line with our retention policy, to check for accuracy and relevancy and to ensure we continue to have a legal basis for processing. If the personal data is no longer necessary, or where we no longer have the legal basis for processing we will delete or put the data beyond use, in line with our Data Protection Policy. If your data becomes inaccurate, we will update it accordingly. Otherwise, we will retain your personal data for the following period:

- Retention period of 10 years from the termination of the contract to which you are party.

SECURITY AND CONFIDENTIALITY

We are committed to transparency, ensuring that your privacy is protected and that your data is used and retained fairly, transparently and in compliance with the relevant data protection laws. We will make sure that we have appropriate technical and organisational measures in place to keep your personal data secure and to protect against accidental or unlawful destruction, loss alteration, disclosure or access. We will provide a level of security appropriate to the risk presented by the nature of the processing we do.

HELP KEEP YOUR PERSONAL DATA ACCURATE AND UP-TO-DATE

This privacy notice details the standards that John Lamb Hill Oldridge will apply when processing your personal data. In return, it is important that you help keep your information accurate, reliable and up-to-date. Any changes to your personal data, such as a new address can be notified to the Data Controller as detailed in the section below.

DATA CONTROLLER

Our Data Controller contact details are:

Naomi Errity
John Lamb Hill Oldridge
Ormond House
26-27 Boswell Street
London
WC1N 3JZ

0207 633 2222
naomi.errity@jlho.co.uk

If you have any queries or requests concerning this privacy notice or your personal data or how we process it, please contact us via the Data Controller as detailed above, or mail@jlho.co.uk

COMPLAINTS

We will be more than happy to help should you have any complaints about the processing of your personal data. You have the right to lodge a complaint with the Supervisory Authority, the Information Commissioner Officer (ICO), who are the national authority responsible for the protection of personal data.

A complaint can be made to the ICO via their website or through their helpline (0303 123 1113).