



DPN18

Data Protection Notice

How we collect and use your personal information

We, M&G Advice (part of M&G)*, take the privacy and protection of your personal information seriously.

So we've set out below information about our processing of your personal information, what rights you have, and how you can get in touch if you want to know more. When we say personal information, we mean information about you.

We collect the following information about you:

- your name, date of birth, gender and contact details (including home address, personal email address, professional email address and telephone number)
- your marketing preferences (including interests and preferred time and means of contact), geolocation and data relating to your use of our websites and online services (see also our Cookie Policy)
- information about your employment and employment status
- information about your household and finances (such as your financial goals and time to retirement).

We obtain information about you during your interactions with us and our representatives, when you apply for our products and/or services, when referred to us from our Business Partners*, Marketing Partners* and other third parties, when you register for any of our events or information you provide via our websites and online services. We may also collect personal information about you from third parties and public sources.

Please note this data protection notice covers our processing of your personal information for the purposes set out in Part A below. Unfortunately if you don't provide all of the information we require this may mean we are unable to provide our products and/or services to you. If you decide to purchase a product or service from us, you'll be provided with our full data protection notice as we will need to process further personal information and for different purposes.

* Please see below for details of M&G and its affiliates, Business Partners and Marketing Partners.

Part A

How we use your personal information and why

We, M&G and our Business Partners, will use the personal information you provide to us, together with other information, for the following purposes:

- to provide you with the information you've requested about our products and/or services – we will need to collect and process personal information from you that is necessary for us to provide you with the product or service you've requested
- the efficient and secure administration and provision of our products and/or services, including to enable us to perform our obligations to you and to provide any relevant services as discussed with you prior to any purchase of a product or service
- complying with any regulatory or other legal requirements; preventing and detecting fraud and financial crime, and co-operating (including by sharing data, where necessary) with the court service, our regulators and law enforcement agencies
- to send you any direct marketing communications you opt in to
- to send you communications about products or services that may be of interest to you
- to gain insight into how our products/services are used and how they might be improved such as through use of storage and access technologies like cookies (see also our Cookie Policy) or contacting you for market research or consumer experience purposes
- to perform automated decision-making, profiling or data analysis, including to build, train and audit Artificial Intelligence models (see Part G below)
- keeping your information accurate and up to date on record and carrying out other internal business administration.

We, M&G, may also:

- rely on legitimate interests or other legal bases in using and sharing your personal information for the purposes described above, for example to provide or customise our products/services and to improve our products/services
- use personal information about you which we have collected from other sources for data analysis, statistical analysis or direct marketing purposes; for example, to allow us to explore ways to develop our business and to gain insights into how our products and services are used (see Part F below)
- together with our Marketing Partners, use the personal information you provide to us, together with other information, to send you direct marketing offers by electronic and non-electronic means including by post (which includes sending you introductions to products and services from carefully selected third parties by post) – for further information on direct marketing, see Part E below.

Unfortunately if you don't provide all of the information we require this may mean we are unable to provide our products and/or services to you. Some of the purposes above are necessary to allow us to perform our contractual obligations to you and to enable us to comply with applicable laws and regulation.

To the extent that we need your consent to use your personal information for the purposes described above, you explicitly provide your consent by confirming to us, our representative or Business Partner / ticking the relevant boxes / submitting an online form / approving or signing the relevant form as appropriate. You have the right to withdraw your consent in such cases, but doing so may affect our ability to fulfil our contractual obligations or obtain the products and services requested – see Part C below.

Who we share your personal information with and why

We may share your personal information within M&G and with our Business Partners and Marketing Partners, for any of the purposes set out in Part A. If appropriate, we may also need to pass on your personal information to financial crime prevention agencies and any legal, regulatory or government bodies.

As we, M&G, and some of our Business Partners and Marketing Partners are global companies, we might need to send your personal information to countries that have different data protection laws to the UK or the European Economic Area. These transfers will only be to countries in respect of which the European Commission and, where applicable, the UK Government has issued a data protection 'adequacy' decision, or to other countries, such as India or the United States of America, but only where appropriate safeguards have been put in place first. In more limited circumstances, we may also need to rely on a derogation under applicable privacy laws.

If you want to know more about these safeguards – like our use of the European Commission's or UK's Standard Contractual Clauses which govern the transfer of information outside of the European Economic Area and UK respectively – further information is available on request from privacy.team@mandg.com.

Other disclosures

Notwithstanding the terms of this data protection notice, we may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets
- if we or substantially all of our assets are acquired by a third party, in which case personal information held by us about our prospective clients, representatives of our prospective Business Partners and/or our direct marketing recipients may be one of the transferred assets

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or in order to enforce or to protect the rights, property, or safety of M&G Advice, our service, our users and any third party we interact with to provide the services.

We keep your personal information for a set amount of time

Your personal information will be stored either for as long as required for the purposes set out in Part A above, or for as long as you have signed up to receive (or haven't opted out of receiving) direct marketing communications from us, or longer if required by law or as is otherwise necessary. It'll always be in line with our data retention policy. We or our Business Partners may retain personal information about you for statistical purposes (for example, to help us better provide our services). Where information is retained for statistical purposes it will always be anonymised, meaning that you will not be identifiable.

Part B

Use of your sensitive personal information

Depending on the product and/or service you have asked for, we may need to process your sensitive personal information, such as information relating to your health and medical history. We will process this type of data where the law permits or requires it, such as where we need to process it for a substantial public interest or to protect someone's vital interests (for example, information collected in respect of a vulnerable person). To the extent that we need your explicit consent to process this kind of personal information in the manner described in Part A you explicitly provide your consent by confirming to us, our representative or Business Partner / ticking the relevant boxes / submitting an online form / approving or signing the relevant form as appropriate.

Part C

You're in control

When it comes to how we use your personal information, you've got the right to:

- request a copy of your personal information for free
- in certain circumstances request that we move your personal information to another organisation if you want us to
- request that we correct anything that's wrong, or complete any incomplete personal information

- ask us to delete your personal information if it is no longer needed for the purposes set out in Part A or if there is no other legal basis for the processing
- limit how we use your personal information or withdraw consents (including for automated decision making) you have given for the processing of your personal information – this does not affect the lawfulness of processing based on consent before its withdrawal
- opt out of direct marketing, and/or object to us using your personal information for direct marketing (included related profiling) or other processing based on legitimate interests
- complain to a data protection authority or another independent regulator about how we're using it.

If you want to do any of these things, or would like an explanation as regards these rights, we've explained how you can get in touch in the Contact Us section.

We have appointed a Data Protection Officer who can be reached at the address shown in the Contact Us section of this document.

We may monitor or record calls or any other communication we have with you. This might be for training, for security, to help us check for quality or for monitoring compliance with the Financial Conduct Authority (FCA)'s Consumer Duty requirements.

Part D

Acting on someone else's behalf?

If you give us personal information about another person (or persons), we'll take that to mean they have appointed and authorised you to act on their behalf. This includes providing consent to:

- our processing of their personal information and sensitive personal information (as we've explained in Parts A, B, E and G)
- you getting any data protection notices on their behalf.

If for any reason you are concerned as to whether you are permitted to provide us with the other person's information, please contact us on the phone number below before sending us anything.

Part E

Direct Marketing

We, M&G, may send you direct marketing communications by email, post, SMS, telephone and push notification, based on personal information that you have provided to us, and/or that we've obtained from other sources (see Part F below) and/or from profiling that we have carried out (see Part G below).

If you've decided to opt in to receiving direct marketing communications from us by confirming to us, our representative or Business Partner / ticking the relevant boxes / submitting an online form / approving and signing the relevant form as appropriate, we, M&G and our Marketing Partners will continue to send these to you by the method you have chosen (electronic and/or non-electronic means including post) unless you change your mind.

We may also send you content about products or services that we think may be of interest to you. If you decide to opt out it's easy to let us know as you can either unsubscribe from any emails/text messages we send you or, in relation to non-electronic direct marketing, write to the address shown in the Contact Us section or call us on **0800 000 000**.

Please note that opting out of one method of marketing, such as emails, won't mean you will be opted out of all marketing. You have the right to object to us using your personal information for direct marketing – see Part C above.

Part F

Sources of personal information

M&G may collect personal information about you directly from you, or from third parties, including:

- our Business Partners and Marketing Partners
- data brokers and data suppliers, and similar data-related service providers, such as Experian or Transunion
- agents working on your behalf
- referral sites, such as Unbiased or VouchedFor
- publicly available sources (such as Companies House), or other information openly available on the internet (such as business-oriented social networks).

The categories of your personal information we may obtain from such sources are: name, professional/business contact details, marketing preferences (including interests), geolocation, behavioural information (such as your use of our websites), information about your finances and employment information. We do this activity for the purposes set out in Parts A, E and G, including our legitimate interest in exploring ways to develop our business through profiling of potential customers / referrals / representatives of potential Business Partners (such as personalising how we communicate to you), market research and direct marketing opportunities. We also use this personal information to perform automated decision-making, profiling or data analysis, including to build, train and audit Artificial Intelligence models (see Part G below).

When we collect personal information from third party sources, established internal controls aim to ensure that the third-party source was permitted to provide this information to M&G and that we may use it for these purposes. You have the right to object to us using your personal information for direct marketing – see Part C above.

Part G

Profiling, Automated Decision Making and Artificial Intelligence

We, M&G, our Business Partners, and our Marketing Partners may use your personal information to make automated decisions affecting you or to conduct other profiling (for example, marketing profiling – see below). To the extent that we conduct such automated decision making activity, we'll provide you with further information at the appropriate time, unless already provided below.

We may use a variety of technology solutions to process your data, including Artificial Intelligence technology. These may be used to support provision of our services (such as appointment booking) and may include training Artificial Intelligence models with your data. Your data will be anonymised wherever possible prior to any model training. We will always strive to ensure that any use of Artificial Intelligence includes appropriate human oversight and is compliant with applicable laws and regulations.

Marketing profiling – M&G uses automated processes to help us provide more personalised marketing of our products/services. We create a marketing profile for you using information such as:

- your name, age, gender and contact details
- your wealth information (for example, information about your financial goals and time to retirement), household information and geolocation

- behavioural data (including data relating to your use of our websites – see also our Cookie Policy)
- details of our interactions with you and your interactions with us.

Our profiling process analyses this data to determine products, services or offers which we think you may be interested in, and the best means by which to contact you. Information we collect about you may be used, where permitted, in relation to marketing other products from our group companies.

We may also use and combine your personal information together with information about other individuals, to help us (and our Marketing Partners) to decide what marketing may be of interest to individuals with similar characteristics to you.

Contact us

If you would like to exercise any of your rights under Part C of this notice, or if you require further information about how we handle your personal data, you can contact us using any of the methods below. We are committed to making it as easy as possible for you to raise concerns or make requests about your data.

Write to us at:

The Data Protection Officer
M&G plc
Customer Service Centre
Lancing
BN15 8GB

Call us on: 0800 000 000

Visit: www.mandg.com

Email: privacy.team@mandg.com

You can also submit a data rights request or a complaint relating to your privacy rights directly to the M&G Privacy Team – privacy.team@mandg.com – which helps us route your query to the appropriate team quickly and securely. If you are submitting a complaint under section 164A of the Data Protection 2018, we will acknowledge the complaint within 30 days and we will handle your complaint in line with applicable laws and regulations. In circumstances where you are not happy with our response to your complaint, you have the right to lodge a complaint with the ICO. For those falling within EU GDPR's scope, you are able to make a complaint directly to your relevant supervisory authority without lodging a complaint with us.

M&G means any affiliates of Prudential UK (including but not limited to, Prudential Distribution Limited, Prudential International Assurance plc, PGDS (UK ONE) Limited, Prudential Life Time Mortgages Limited, M&G Global Services Private Limited, M&G Investments Group, M&G Advice Partners Limited and Prudential Corporate Pensions Trustee Limited).

Prudential UK means The Prudential Assurance Company Limited, Prudential Distribution Limited, Prudential Life Time Mortgages Limited, Prudential Pensions Limited, and M&G Advice Partners Limited as appropriate.

Business Partners means our Appointed Representatives, service providers, accountants, auditors, IT service and platform providers, intermediaries, reinsurers, retrocessionaires, investment managers, agents, pension trustees (and other stakeholders), scheme advisors, introducers, selected third party financial and insurance product providers, and our legal advisers.

Marketing Partners means our service providers (including advertising and media service providers such as Meta entities (including WhatsApp and Instagram) and Google entities (including YouTube, Google Ads and Google Analytics), intermediaries, pension trustees (and other stakeholders), scheme advisors, introducers and selected third party financial and insurance product providers.

