



DPN19

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, gender and date of birth
- your contact details (including home address, personal email address, home telephone number and mobile telephone number)
- your nationality
- your marketing preferences (including interests and preferred time and means of contact) and data relating to your use of our websites and online services (see also our Cookie Policy)
- information about your employment and employment status, where necessary for us to provide our services to you
- information about your relationships with others (for example, your professional advisers, your relation to your spouse, household cohabitants, dependants and family members)
- information about your finances and payment of tax (such as in which country you pay tax and your national identifier (for example your national insurance number))
- information about your identity and the sources of the money you are investing, to meet legal requirements
- information about your health and medical history, where necessary for us to provide our services to you (see Part D below).

We collect personal information from you for the purposes set out in Part A below, such as where it is necessary for us to provide you with the product or service you've requested or to comply with statutory or contractual requirements. Unfortunately if you don't provide all of the information we require this may mean we are unable to provide our products and services to you.

We obtain information about you during your (or your Financial Adviser's) interactions with us, our representatives, Business Partners and Marketing Partners, when you register for any of our events or information you provide to us, including 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.

* Please see below for details what the following terms mean: M&G, 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:

- the efficient and secure administration and provision of our products and services, including to help identify you and any accounts you hold with us; 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
- carrying out checks using agencies such as credit reference agencies, tracing companies, or publicly available information (see Part B below)
- the provision of customer services – like to reply to a question, or tell you that something's changing
- 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 or 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 or, profiling or data analysis, including to build, train and audit Artificial Intelligence models (see Part C for more below)
- keeping your information accurate and up to date on record and carrying out other internal business administration.

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.

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 H 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). Please see Part G for further details on direct marketing.

Unfortunately if you don't provide all of the information we require this may mean we are unable to offer you our full range of products or services, or to provide the products and services which are most appropriate for and tailored to your needs, or that we are unable to provide any products or services to you at all.

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 (or your Financial Adviser) / approving or signing the relevant form (which could include ticking the relevant boxes at Part G below) and returning it to us (or to your Financial Adviser), 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 – see Part E below.

Who we share your personal information with and why

We may share your personal information within M&G and with your Financial Adviser, our Business Partners and our Marketing Partners, for any of the purposes set out in Part A. If you have a joint policy or investment, the other person may receive your personal information too. 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 clients will 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 you (or your joint policyholder) are our customer, or longer if required by law or as is necessary for the relevant purpose set out in Part A. 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

Reference checks

For certain products, we may use approved credit reference agencies, tracing companies, financial crime prevention agencies and other Business Partners, or publicly available information, to help us to check your identity, as well as to prevent fraud, economic crime and money laundering: this may include checks on your current or previous addresses. Results of these may be recorded for future reference.

These checks may also be carried out for a joint policy holder or person(s) that you provide personal information on.

Should we ever lose contact with you, we may use these agencies or other sources to verify your address to help us get back in touch.

Any transfer of your personal information will always be done securely.

Part C

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, to support provision of our services, or marketing profiling) as explained 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 technologies. These may be used to support provision of our services (such as complaints handling and 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 transactions with us, 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.

Part D

Use of your sensitive personal information

For certain products or services, we and our Business Partners will 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 for any of the purposes set out in Parts A, B or C, above, you explicitly provide your consent by confirming to us, our representative or Business Partner (or your Financial Adviser) / approving or signing and returning the relevant form to us (or to your Financial Adviser) as appropriate. You have the right to withdraw your consent at any time, but doing so may affect our ability to fulfil our contractual obligations – see Part E below. If you don't provide such consent, or later withdraw such consent, this may mean we are unable to offer you our full range of products or services, or to provide the products and services which are most appropriate for and tailored to your needs, or that we are unable to provide any products or services to you at all.

Part E

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 above 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 (including 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, or to help us check for quality or for monitoring compliance with the Financial Conduct Authority (FCA)'s Consumer Duty requirements.

Part F

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, C, D 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 G

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, our representatives or Business Partners and/or that we've obtained from other sources (see Part H below) and/or from profiling that we have carried out (see Part C above).

We and M&G may send you information by post about the Prudential UK (which includes M&G Advice – see below) and M&G's products and services and carefully selected third parties. Additionally, from time to time, Prudential UK and M&G would like to contact you by electronic means with details about products, services and any special offers. Please note that any consent you give for electronic direct marketing will not apply to M&G Investments Group and Prudential International Assurance plc as they operate their own customer databases and may contact you separately.

If you consent to Prudential UK and M&G contacting you for this purpose by electronic means (email / phone / text message), please confirm this to our representative / Business Partner / your Financial Adviser or return this document to us (or to your Financial Adviser) with your preferences ticked below to say how we may contact you (tick as many or as few as you like):

Email Phone Text

If you change your mind, and 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 E above.

Part H

Sources of personal information

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

- your Financial Adviser, our Business Partners and Marketing Partners
- bankruptcy registers and sanctions lists
- tax authorities, government and/or regulatory authorities
- fraud prevention and/or law enforcement agencies
- agents working on your behalf
- data brokers and data suppliers, and similar data-related service providers, such as Experian or Transunion
- publicly available databases and 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: your professional/business contact details, marketing preferences (including interests), geolocation, behavioural information (such as your use of our websites and online services), information about your finances and employment information. We do this activity for the purposes set out in Parts A, B, C and G, including complying with any regulatory or other legal requirements, or our legitimate interest in exploring ways to develop our business through profiling of customers (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 C above.

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 E above.

Contact us

If you want to exercise your rights in Part E or if you require any other information about any other part of this notice, you can contact us in a number of different ways.

Write to us at:

**The Data Protection Officer
Customer Service Centre
Lancing
BN15 8GB**

Call us on: **0800 000 000**

Visit: [mandg.com/wealth](https://www.mandg.com/wealth)

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, your Financial Adviser, our 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.

Financial Adviser means the Financial Conduct Authority authorised and regulated or exempt financial adviser and, where this is an Appointed Representative, its principal authorised firm or its or their group entities that you have appointed to provide you with financial advice. Your Financial Adviser may also have appointed third parties to assist in providing you with financial services.

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.