

DPN18

Data Protection Notice

How we collect and use your personal information

We, M&G Wealth Advice (part of M&G plc)*, 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, such as your name, date of birth, location, marketing preferences, employment details, information about your finances, and contact details.

We obtain information about you during your interactions with 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. 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 plc and its affiliates, Business Partners and Marketing Partners.

Part A

How we use your personal information and why

We, M&G plc 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 administration 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
- 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
- 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.

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. We 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 improve our products and/or services or to send you marketing by post.

We may also use personal information about you which we have collected from other sources for data analysis or direct marketing purposes – see Part F below. These activities allow us to explore ways to develop our business and to gain insights into how our products and/or services are used. For further information on direct

marketing, see Part E below. 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 our representative/ticking the relevant boxes/submitting an online form/signing this 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 plc and with our Business Partners and Marketing Partners, for any of the purposes set out in Part A. If appropriate, we may also pass on your personal information to any legal, regulatory or government bodies.

As we, M&G plc, and some of our Business 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.

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.

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 health, genetics, biometric identifiers and sexual orientation. 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 our representative/ticking the relevant boxes/submitting an online form/signing this 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 (we may charge you for this if the request is manifestly unfounded or excessive)
- 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 your consent you have given for the processing of your personal information – this does not affect the lawfulness of our processing based on consent before its withdrawal
- opt out of direct marketing, and/or object to us using your personal information for direct marketing 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.

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 and B above)
- 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 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 our representative/ticking the relevant boxes/submitting an online form/signing this form as appropriate we, M&G plc 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 we send you or write to the address shown in the Contact Us section. 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
- 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, geolocation, information about your finances and employment information. We do this activity for the purposes set out in Part A, including our legitimate interest in exploring ways to develop our business through profiling of potential customers/referrals, 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 plc, 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. This may include training Artificial Intelligence models with your data. Your data will be anonymised wherever possible prior to any model training unless the model is private to M&G. 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 – we use 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, household information and geolocation
- behavioural data (such as data relating to your use of our websites – see our Cookie Policy);
- details of our interactions with you.

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 in relation to one of our companies may be used, where permitted to do so, in relation to marketing other products from our group.

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

Contact Us

If you want to exercise your rights in Part C 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

or visit: www.mandg.com/wealth

M&G plc 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 Wealth Advice 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 Wealth Advice Limited as appropriate.

Business Partners means 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.

Marketing Partners means our service providers, intermediaries, pension trustees (and other stakeholders), scheme advisors, introducers and selected third party financial and insurance product providers.