

# Website Privacy Policy

## Introduction

Welcome to Sanlam's website Privacy Policy.

Sanlam UK Limited respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, store, and disclose your personal data when you visit our website (regardless of location) and outlines your rights under data protection laws.

This Privacy Policy together with our [Website Terms of Use](#) and [Cookie Policy](#) apply to your use of the Sanlam website and by continuing to use the Sanlam website you will be consenting and agreeing to each of these terms.

## Our Commitment to Data Protection Principles

This Privacy Policy adheres to the following data protection principles outlined in the UK GDPR:

- **Lawfulness, fairness, and transparency:** We collect and process your data only for legitimate purposes and with your knowledge.
- **Purpose limitation:** We use your data only for the purposes we collected it for, unless legally required otherwise.
- **Data minimization:** We collect only the personal data necessary for the stated purposes.
- **Accuracy:** We strive to maintain accurate and up-to-date personal data.
- **Storage limitation:** We retain your data only for as long as necessary.
- **Security:** We implement appropriate security measures to protect your personal data.
- **Accountability:** We are responsible for your personal data and ensuring compliance with data protection laws.

## Data Controller

Generally, Sanlam UK Limited is the data controller for this website and the data you submit through it. We will let you know which entity will be the data controller for your data when you apply for a product or service with us and you will be referred to our [Privacy Note](#).

## Contact Us

If you have any questions about this Privacy Policy or your data protection rights, please contact us:

- Email: [amcompliance@sanlam.co.uk](mailto:amcompliance@sanlam.co.uk)
- Address: Data Protection, Sanlam UK Limited, 5th Floor, 27 Clements Lane, London, EC4N 7AE

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<https://ico.org.uk/>).

## Changes to the Privacy Policy

We may update this Privacy Policy periodically. Please check our website for the latest version.

## Your Duty to Inform Us of Changes

Please keep us informed if your personal data changes during your relationship with us.

## Third-party Links

Our website may contain links to third-party websites. We are not responsible for their privacy practices.

## The Data We Collect

We collect limited personal data through our website:

- **Contact Information:** Name, email address, phone number (collected via "Contact Us" form, feedback forms, surveys, event forms, job applications, or competitions).
- **Technical Data:** IP address, login data, browser type, device information, operating system (collected automatically).
- **Profile Data:** Responses to feedback and surveys.
- **Marketing and Communications Data:** Preferences for receiving marketing communications from us or third parties.

We do not ask for any Special Categories of Personal Data or information about criminal convictions.

## How We Collect Your Data?

We collect your data through:

- **Direct interactions:** When you submit information via the "Contact Us" form, surveys, feedback forms, etc.
- **Automated technologies or interactions:** Cookies and similar technologies collect technical data about your browsing activity. (See our Cookie Policy for details.)
- **Third-Party sources:** Identity checking services, other Sanlam group companies, or publicly available sources (with your consent).

You are not obligated to disclose any personal data while browsing our website.

## How We Use Your Information

We will only use your personal data for the following lawful purposes, and you will be informed before submission:

- **Fulfilling contracts:** Responding to queries submitted via the "Contact Us" form or managing our relationship with you.
- **Legitimate interests:** Updating records, preventing fraud, responding to queries, website improvement, marketing strategy development (where your interests do not override ours).
- **Legal obligations:** Complying with regulations, detecting and preventing fraud, verifying your identity.

## Marketing Communications

You will only receive marketing communications from us if you have opted-in or we are legally entitled to do so. You can opt-out at any time.

## Change of Purpose

We will only use your data for the purposes we collected it for, unless there's a compatible additional reason and we explain the legal basis for doing so.

## Disclosures of Your Personal Data

We may share your personal data with:

- Sanlam group companies for IT services, customer support, and group reporting.
- Third-party service providers for IT services and identity checking (based in the EEA).
- Legal or regulatory bodies as required by law.
- Potential buyers or acquirers of our business.

All third parties are required to respect the security of your data and comply with data protection laws. We do not allow them to use your data for their own purposes.

## International Transfers (Continued)

We may transfer your data to:

- Countries deemed adequate for data protection by the UK Information Commissioner (ICO).
- Countries with specific contractual arrangements approved by the ICO to provide a similar level of protection as the UK.
- The USA, using specific contracts approved by the ICO, but be aware that US local and federal security laws may override these contracts.

## Data Security

We have implemented appropriate security measures to protect your personal data from unauthorized access, use, disclosure, alteration, or destruction. These measures include:

- Secure storage facilities
- Access controls
- Data encryption
- Regular security audits

## Data Retention

We will only retain your personal data for as long as necessary for the purposes we collected it for, taking into account legal, accounting, or reporting requirements.

- **Customers:** We retain data for at least seven years after they cease being customers for legal and regulatory purposes.
- **General data:** We determine the retention period based on the type and sensitivity of the data, the potential risk of harm, and the applicable legal requirements.

## Your Legal Rights

Under the UK GDPR, you have various rights regarding your personal data:

- **Request access:** You can request a copy of the personal data we hold about you.
- **Right to rectification:** You can request correction of inaccurate or incomplete data.
- **Right to erasure:** You can request deletion of your data when there is no compelling reason for us to keep it.
- **Right to object:** You can object to the processing of your data based on legitimate interests or for direct marketing purposes.
- **Right to restriction of processing:** You can request to restrict the processing of your data in certain situations.
- **Right to data portability:** You can request your data in a structured, commonly used, and machine-readable format and transfer it to yourself or another party.
- **Right to withdraw consent:** You can withdraw your consent to the processing of your data at any time.

To exercise any of these rights, please contact us using the details provided earlier.

## No Fees for Exercising Your Rights

You will not normally be charged a fee for exercising your data protection rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive.

## Verification and Response Time

We strive to respond to all legitimate requests within one month. In complex cases or multiple requests, it may take longer, but we will notify you and keep you updated.

## Changes to this Privacy Policy

We may update this Privacy Policy periodically. Please check our website for the latest version.

## Effective Date

**This Privacy Policy is effective as of March 2024.**