

Howden Employee Benefits & Wellbeing Privacy Policy (Corporate)

Effective date: 13th January 2021

Howden Employee Benefits & Wellbeing Limited (we or us) are committed to protecting and respecting your privacy. Under the General Data Protection Regulation as implemented into UK law ("GDPR"), we are required to provide you with certain information about what data we hold about you and any family members or other dependants that you or they provide, and how we use it.

This policy (together with our Terms & Conditions of Website Use ("Terms") and Cookie Policy) set out the basis on which we will process any personal data we collect from you about you and any dependants, that you provide to us, or that is provided to us about you or your dependants, in the course of us providing protection, healthcare, wellbeing and employee benefits related services ("Services") to our clients. Please read the following carefully to understand the personal data of yours that we will process and how we will deal with it.

The technical bit

We hold and process personal data about you in our capacity as a controller, in order to advise our clients on setting up protection, healthcare and other employee benefits related schemes and wellbeing programmes, arranging insurance cover and other benefits with insurers and other benefits providers, and administering or assisting in the administration and ongoing management of such schemes and programmes. We may obtain this information direct from you, or sometimes, if you are a dependant of an employee of our client, from that employee, from our client, or from trade or professional associations of which you are a member, or other third parties. If you provide information relating to your dependants, you must provide a copy of this notice to them, or otherwise ensure that they are fully aware of its terms. Our contact details are set out below.

Our Data Protection Officer is Owen Davies whose contact details are set out below.

Our client will have determined the legal basis it has to process your personal data and that of any dependants and provide or arrange for its provision to us in order for us to provide the services mentioned above. In addition to any other legal basis for our use of your personal data, for most personal data, our basis for using personal data will also be that it is also necessary for the legitimate interests of our client in obtaining advice on and setting up and running protection, healthcare and other employee benefits schemes and wellbeing programmes, our legitimate interests in advising our client on such schemes and programmes, and arranging and administering such schemes and programmes, and insurers' and other benefits providers' interests in providing such schemes and programmes. These benefits schemes and programmes are intended to benefit you and your dependants, and other employees and their dependants of our client. The provision of your and, where appropriate, their personal data is needed for you and them to be able to receive benefits under the scheme/programme.

In some cases, insurers and other benefits providers may require information about your health and/or that of your dependants in order to consider an application to provide cover/benefits, or to make that cover/those benefits available to you/your dependants. In addition to any other legal basis our client may have to process that data, where (as is often the case, the relevant benefits are provided to you/your dependants and secured by insurance), the legal basis for their, our and any insurer's use of that data will usually be that it is necessary for reasons of substantial public interest and subject to appropriate protections. This is because the UK Government recognises that it is generally in the public interest for employers to provide insurance-supported health, protection and wellbeing and other benefits. In the limited circumstances where the benefits are not secured by insurance, or the provision of the information does not fall within the substantial public interest justification mentioned above, and no other legal basis is available, the legal basis of our processing will be your explicit consent.

Where necessary, documentation that you/your dependants need to complete to provide that information will include a provision where you/they can indicate that consent. If you do not consent to the provision of that data, we will be unable to provide the information to the relevant insurer/benefit provider, and that insurer/benefit provider may not be willing to provide the cover in respect of which the information about your/their health is sought. You may withdraw that consent at any time by notifying us via our contact details below. This may mean, however, that the insurers/benefits providers will no longer be willing to provide the affected benefits.

What data we hold and how we use it

The information we will or may process about you is listed below:

Individual making an initial enquiry to us	A member of a group scheme	A claimant on a group scheme	A member of a flexible benefits scheme
<ul style="list-style-type: none"> Name (First, Last or Middle) Residential or Correspondence Address Personal or Business E-mail Tel No. (Landline, Mobile, Business, Fax) Date of Birth (incl. Year of Birth) Age Gender Marital Status Bank Account Details Credit / Debit Card Details Physical Description Audio / Voice-mail 	<ul style="list-style-type: none"> Name (First, Last or Middle) Residential or Correspondence Address Personal or Business E-mail Tel No. (Landline, Mobile, Business, Fax) Date of Birth (incl. Year of Birth) Age National Insurance Number Gender Marital Status Nationality Social, Leisure & Lifestyle Absence Records Employment Status Employment Benefits 	<ul style="list-style-type: none"> Name (First, Last or Middle) Residential or Correspondence Address Personal or Business E-mail Tel No. (Landline, Mobile, Business, Fax) Date of Birth (incl. Year of Birth) Age National Insurance Number Gender Marital Status Nationality Absence Records Employment Status 	<ul style="list-style-type: none"> Name (First, Last or Middle) Residential or Correspondence Address Personal or Business E-mail Tel No. (Landline, Mobile, Business, Fax) Date of Birth (incl. Year of Birth) Age National Insurance Number Gender Marital Status Nationality Social, Leisure & Lifestyle

<ul style="list-style-type: none"> • Title or Position • Comment / Opinions • Marketing Preferences • Signature • Health Information (Physical or Mental) 	<ul style="list-style-type: none"> • Employee No. / ID • Next of Kin / Beneficiaries • Remuneration / Salary Details • Physical Description • Title or Position • Comment / Opinions • Pension Details • Other Income (Interest, Dividends) • Health Information (Physical or Mental) • Beneficiaries 	<ul style="list-style-type: none"> • Employment History • Employment Benefits • Employee No. / ID • Educational Details • Next of Kin / Beneficiaries • Remuneration / Salary Details • Compensation Details • Audio / Voice-mail • Title or Position • Pension Details • Other Income (Interest, Dividends) • Signature • Health Information (Physical or Mental) • Beneficiaries 	<ul style="list-style-type: none"> • Absence Records • Employment Status • Employment Benefits • Employee No. / ID • Next of Kin / Beneficiaries • Remuneration / Salary Details • Tax Code / ID • Physical Description • Title or Position • Comment / Opinions • Pension Details • Other Income (Interest, Dividends) • Health Information (Physical or Mental) • Beneficiaries
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We will use your personal data to advise our client on protection, healthcare and other employee benefit schemes and wellbeing programmes, arranging such schemes with insurers and other benefits providers, and managing and administering such schemes and programmes. In order to do this, we have to provide that information to the insurers and other benefits providers with whom we deal, to enable them to consider whether they are willing to provide the cover/benefits requested and, if so, on what terms. Those insurers and benefit providers will receive your data as independent controllers, and will be responsible for processing your data in accordance with the GDPR. They will have their own privacy notices and documentation setting out how and why they process your personal data. A full list of the insurers and other benefits providers we currently deal with can be found [here](#).

We may provide the service to our client through any member company of the Howden Group Holdings Limited ("Howden Group"). In such case, they will act as controllers and will comply with the terms of our agreement with our client and this privacy notice.

In particular, Risk Policy Administration Limited ("RPA") will provide some wellbeing services and manage the Psyon Empower and Portal systems through which data relating to protection, health and other employee benefit schemes and wellbeing programmes, including your personal data, is obtained from you or your employer, and communicated to insurers and benefits providers. Some service providers who provide to us the infrastructure to enable us to provide the services, may have access to your personal data as our processors under the terms of agreements that limit the use of your data to that necessary to provide services to us, and contain other mandatory protections for your data.

For business purposes, to help prevent/detect crime or where required by Law or Regulation, we may need to transfer, or allow access to, your personal data to parties based overseas. These parties include brokers, insurers, re-insurers, service providers, other Howden Group companies & law enforcement

agencies. Where we do this, we will ensure that your information is transferred in accordance with the applicable Data Protection requirements.

If the Data Protection laws of the country where we transfer your data are not recognised as being equivalent to those in the UK, we will ensure that the recipient enters into a formal legal agreement that reflects the standards required. You have the right to ask us for more information about the safeguards we have put in place as mentioned above. Contact us as set out in this privacy notice if you would like further information or to request a copy where the safeguard is documented (which may be redacted to ensure confidentiality).

We may also occasionally share your data with our legal and other professional service providers, when necessary to obtain appropriate advice.

We, RPA and other companies in the Howden Group may create, use and provide to our customers and other third parties non-personalised, aggregated statistical, trend and risk analyses ("**Statistical Data**") from the information provided to us, but that Statistical Data will not identify our customer or contain any of your or any other individual's personal data.

We do not carry out any automated individual decision-making using your personal data.

Storage

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, and as set out in this privacy notice, and for as long as we are required to keep it by law or regulatory requirements, or need to keep it for the establishment, exercise or defence of legal claims.

Your rights

You have the following rights which can be exercised by contacting us via the contact details set out below:

- To access personal data held about you, and where our processing is based on your consent, to have that data transferred to another controller, where technically feasible.;
- To request the rectification or completion of personal data which are inaccurate or incomplete;
- In certain circumstances, to restrict or object to the processing of your personal data or to request its erasure;
- To lodge a complaint with the ICO.

You can obtain further information about your rights from the Information Commissioner's Office at www.ico.org.uk or via their telephone helpline (0303 123 1113).

The personal data we hold about you is used to arrange and manage a protection, health and/or other employee benefit scheme, and/or a wellbeing programme for our client, and for this purpose, we may from time to time request further information from you. If you fail to provide such information, or request that the personal data we already hold is erased or restricted, this may affect your benefits under the scheme/programme or our ability to manage them.

Contact us

If you need or want to contact us, or our Data Protection Officer, our respective contact details are set out below.

We are part of the Howden Group Holdings Limited and our business contact details are:

Registered office:	One Creechurch Place, London EC3A 5AF
Telephone:	020 3327 5700
E-mail:	info@howdengroup.com
Website:	www.howdengroup.com
Twitter:	@Howden_EB
LinkedIn:	https://www.linkedin.com/showcase/howden-employee-benefits-&-wellbeing/

The contact detail of our Data Protection Officer is:

Name:	Owen Davies
Address:	One Creechurch Place, London EC3A 5AF
Telephone:	020 3327 5700
E-mail:	dpo@howdengroup.com