

Our Updated Privacy Policy

The law has changed, and you're in control of how we use your data. We'd love to keep in touch with you about all things health and wellbeing - you just need to tell us what you'd like to hear about and how you'd like to hear about it.

You're always in control. You can update your choices at any time. Simply visit [westfieldhealth.com](https://www.westfieldhealth.com) and register or log in to My Westfield.

Changes to your Plan Guide

The changes detailed over the next 2 pages supersedes the information contained within the Terms and Conditions in your plan guide.

Marketing Preferences

At **Westfield Health**, we help people to lead healthier lives and feel their best. We occasionally send out communications with ideas and information on health and wellbeing, plus special offers that we think are of value to you, invitations to take part in our research panel Westfield Insiders, and on the products we've designed to help keep you and your loved ones healthy and happy.

We'll never make your data available to anyone outside Westfield Health for them to use for their own marketing purposes, we'll treat your data with respect and will keep your details safe and secure.

You can let us know what you want to hear about and how you want to hear about it by visiting [westfieldhealth.com](https://www.westfieldhealth.com) to register or log in to My Westfield where you can also update your details. If your plan guide includes an application form, you can also let us know on there.

We'd like to bring to your attention our Privacy Policy which details how your data is used and stored, and how to exercise your privacy rights. Visit www.westfieldhealth.com/about-us/legal/privacy-policy.

Westfield Contributory Health Scheme Ltd (company number 303523), Westfield Health & Wellbeing Ltd (company number 9871093) are collectively referred to as Westfield Health and are registered in England & Wales.

Data Protection / Fair Processing Notice

Who we are:

"Westfield Health" (referred to as "we", "us" or "our") is a trading name of: Westfield Contributory Health Scheme Ltd, Westfield House, 60 Charter Row, Sheffield, S1 3FZ. Company Registration Number: 0303523. ICO registration number: Z5678949.

We have a Data Protection Officer who can be contacted in the following ways should you have any questions, complaints or feedback about your privacy. Please email: dpo@westfieldhealth.com or write to them via the above address.

What information we collect:

In relation to your plan, you may provide us with your personal details including:

- Your title, full name, postal and billing addresses, email address, phone number and date of birth;
- Your payment details;
- Information in relation to your health, including any pre-existing medical conditions;
- Details in relation to your partner, friends or dependents for the purposes of adding them to your plan/policy or in order to create their own. Where you have provided information about another person you should ensure that you have their approval to do so.

How we use it:

Information provided to us or collected in relation to your plan will be used by Westfield Health, or selected third parties to:

- Fulfill your order;
- Provide the benefits for which you have applied;
- Manage and maintain your records;
- Manage the underwriting and/or claims handling procedures (including your dependants' claims);
- Handle complaints and improve customer service;
- Administer marketing on behalf of Westfield Health. (You can change your details and preferences at anytime by logging into and using your "My Westfield" account or by calling our friendly Customer Helpline on 0114 250 2000);
- Prevent and detect fraud;
- Understand our customers better in order to provide tailored communications, a better experience and to improve our services.

We will record, and monitor telephone calls made to and from Westfield Health's sales and customer service teams. We do this in order to continuously improve our service

to customers and for training purposes. This will also include the recording and monitoring of data relating to health and medical conditions. We do not record the element of telephone calls where any form of payment is being made.

We may share information, including your health and medical information, with third parties or individuals. These may include:

- Other insurance providers in order to process your claims;
- For purposes of national security; taxation; criminal investigations or when we are obliged to do so by law;
- To prevent and detect fraud. This will include the recording and monitoring of Special Category data, such as health and medical conditions for all claims processed under your plan;
- Your employer (if they are paying some or all of the premium for your cover) where we have a reasonable belief that the claims activity is in serious breach of our terms and conditions and/or may be fraudulent;
- Marketing agencies or mailing houses acting on our behalf.

We'll never make your personal data available to anyone outside Westfield Health for them to use for their own marketing purposes without your prior consent.

How we look after your data:

We will protect the data that you entrust to us at all times via appropriate security measures and controls. We'll also ensure through the contracts we have in place, that other businesses we work with are just as careful with your data.

All the personal data we process is processed by our staff in the UK and stored on servers located inside the European Economic Area (EEA).

How long we keep your data:

We will keep your personal data for a number of purposes, as necessary to allow us to carry out our business. Your information will be kept securely for up to 6 years following the date you cease to remain an active customer, after which time it will be archived, deleted or anonymised. In some cases for the purposes of processing your existing or future claims and for underwriting purposes, we may keep personal information for longer. Where we, at present, cannot technically erase the data we will ensure this is securely archived with restricted access.

Your Rights:

- **Right to be Informed:** We will always be transparent in the way we use your personal data. You will be fully informed about the processing through relevant privacy notices.
 - **Right to Access:** You have a right to request access to the personal data that we hold about you and this should be provided to you. If you would like to request a copy of your personal data, please contact our Data Protection Officer.
 - **Right to Rectification:** We want to make sure that the personal data we hold about you is accurate and up to date. If any of your details are incorrect, please let us know and we will amend them. You can also visit the "My Westfield" section of the website and update your details at any time.
 - **Right to Erasure:** You have the right to have your data 'erased' in the following situations:
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed.
 - When you withdraw consent.
 - When you object to the processing and there is no overriding legitimate interest for continuing the processing.
 - When the personal data was unlawfully processed.
 - When the personal data has to be erased in order to comply with a legal obligation.
- If you would like to request erasure of your personal data, please contact our Data Protection Officer. Please note that each request will be reviewed on a case by case basis and where we have a lawful reason to retain the data or where exceptions exist within our retention policy, then it may not be erased.
- **Right to Restrict Processing:** You have the right to restrict processing in certain situations such as:
 - Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data.
 - Where you have objected to processing and we are considering whether Westfield Health's legitimate grounds override your legitimate grounds.
 - When processing is unlawful and you oppose erasure and request restriction instead.
 - Where Westfield Health no longer need the personal data but you require the data to establish, exercise or defend a legal claim.
 - **Right to Data Portability:** You have the right to data portability in certain situations. You have the right to obtain and reuse your personal data for your own purposes via a machine-readable format, such as a .CSV file. If you would like to request portability of your

personal data, please contact our Data Protection Officer, this only applies:

- To personal data that you have provided to us;
 - Where the processing is based on your consent or for the performance of a contract; and
 - When processing is carried out by automated means.
- **Right to Object:** You have the right to object to the processing of your personal data in the following circumstances:
 - Direct marketing (including profiling). Remember you can opt out at any time from marketing communications via our Marketing Preferences, available in "My Westfield"; and
 - Where the processing is based on legitimate interests.
 - **Rights in Relation to Automated Decisions Making Including Profiling:** You have the right to not be subject to a decision when it is based on automated processing. If you have any questions in relation to how your information is processed in this way, then please contact our Data Protection Officer.

Not Happy?

If you feel that "Westfield Health" has not upheld your rights, we ask that you contact our Data Protection Officer so that we can try and help.

If you are not satisfied with how Westfield Health processes your data, or believe we are not processing your data in accordance with the law you have the right to lodge a complaint with the Information Commissioner's Office (ICO). Please visit: www.ico.org.uk

Your plan includes a Care After Hospital benefit which is underwritten by Astrenska Insurance Limited who are part of the Collinson Group. The following wording sets about how they handle data that they receive about you.

How we use the information about you:

As a data controller, we collect and process information about you so that we can provide you with the products and services you have requested. We also receive personal information from your agent on a regular basis while your policy is still live. This will include your name, address, risk details and other information which is necessary for us to:

- Meet our contractual obligations to you;
- Issue you this insurance policy;
- Deal with any claims or requests for assistance that you may have
- Service your policy (including claims and policy administration, payments and other transactions); and,
- Detect, investigate and prevent activities which may be illegal or could result in your policy being cancelled or treated as if it never existed.

In order to administer your policy and deal with any claims, your information may be shared with trusted third parties. This will include members of The Collinson Group, third party administrators, contractors,

investigators and claims management organisations where they provide administration and management support on our behalf. Some of these companies are based outside of the European Union where different data privacy laws apply. Wherever possible, we will have strict contractual terms in place to make sure that your information remains safe and secure.

We will not share your information with anyone else unless you agree to this, or we are required to do this by our regulators (e.g. the Financial Conduct Authority) or other authorities.

Processing your data:

Your data will generally be processed on the basis that it is:

- Necessary for the performance of the contract that we have with you;
- Is in the public or your vital interest; or
- For our legitimate business interests.

If we are not able to rely on the above, we will ask for your consent to process your data.

How we store and protect your information:

All personal information collected by us is stored on secure servers which are either in the United Kingdom or European Union.

We will need to keep and process your personal information during the period of insurance and after this time so that we can meet our regulatory obligations or to deal with any reasonable requests from our regulators and other authorities.

We also have security measures in place in our offices to protect the information that you have given us.

How you can access your information and correct anything which is wrong:

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information please contact us by email or letter as shown below:

Email address:

data.protection@collinsongroup.com

Postal Address: Sussex House, Perrymount Road, Haywards Heath, Sussex, RH16 1DN

This will normally be provided free of charge, but in some circumstances, we may either make a reasonable charge for this service, or refuse to give you this information if your request is clearly unjustified or excessive.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

If you wish to make a complaint about the use of your personal information, please contact our Complaints manager using the details above. You can also complain directly to the Information Commissioner's Office (ICO). Further information can be found at <https://ico.org.uk/>