

**SCOTTISH WIDOWS**

*official pensions and investment provider*



# Important notes for Applications

**(Please read these important notes before making your decision. Scottish Widows will rely on these notes when administering your investment. If you do not understand any of these notes, please let us know).**

## Data Protection Act

Your information will be held by Scottish Widows which is part of the Lloyds Banking Group.

The Lloyds Banking Group includes Scottish Widows and a number of other companies using brands including Lloyds TSB, Halifax and Bank of Scotland, and their associated companies. More information on the Lloyds Banking Group can be found at [www.lloydsbankinggroup.com](http://www.lloydsbankinggroup.com)

We may ask you to provide physical forms of identity verification to set up and administer your investment or plan. We may also use it for market research, statistical purposes and the prevention and detection of fraud. In cases where it is considered necessary for the prevention and detection of fraud or other financial crime, your information may be shared with other organisations. If necessary a copy of the application form and any other supporting information may be given to a reassurance company who will share the risk with us. We will keep the information you have supplied confidential and will not share it with others without your agreement, except where the law permits, when it may be disclosed to law enforcement agencies, Ombudsman and Regulators and except in the circumstances that follow. The information you provide may be shared with financial advisers or people acting on your behalf. It may also be shared with our agents and others in connection with administering your investment or plan and services for you.

Your personal information will be shared within the Lloyds Banking Group so that we and any other companies in our Group can look after your relationship with us. By sharing this information it enables us to better understand your needs and provide products in the efficient way that you expect.

Under the Data Protection Act you have the right of access to your personal data. The Act allows us to charge a fee of £10 for this service. If anything is inaccurate or incorrect, please let us know and we will correct it.

Any information which you have provided relating to your health or lifestyle is required for underwriting purposes and is defined as 'sensitive data' by the Data Protection Act 1998. This information will be held securely with access limited to those who need to see it.

It is important that you understand how the personal information you give us will be used. Therefore, we strongly advise that you read our Privacy Statement, which you can find at [www.scottishwidows.co.uk/legalprivacy](http://www.scottishwidows.co.uk/legalprivacy) or you can ask us for a copy. By signing this application/declaration you agree to your personal information being used in the ways we describe in our Privacy Statement. Please let us know if you have any questions about the use of your personal information.

We may administer the investment or policy and any existing investments or policies you may have with Scottish Widows, and provide other services, from centres in countries outside the European Economic Area (such as India and the USA) that do not always have the same standard of data protection laws as the UK. However, there will be a contract in place to ensure that your information is adequately protected, and we will remain bound by our obligations under the Data Protection Act even when your personal information is processed outside the European Economic Area.

We may record and monitor telephone calls with you in case we need to check we have carried out your instructions correctly and to help improve our quality of service.

## Money Laundering Regulations

Under current regulations we are required to verify the identity of our customers. In order to meet this requirement and for the prevention and detection of fraud, we will access information from a credit reference agency\* to confirm your identity. They will authenticate your name, address and date of birth, which involves checking the details you supply against those held on any databases that the company carrying out the checks on our behalf (or any similar company) has access to. This includes information from the Electoral Register. We will use scoring methods to authenticate your identity. Our search will not be used by lenders or insurers when assessing lending or insurance risks. We may also pass information to financial and other organisations involved in money laundering and fraud prevention to protect ourselves and our customers from theft and fraud. If you give us false or inaccurate information and we suspect fraud, we will record this and share this information with other organisations.

If you provide us with information about another person, we will treat this as confirmation that they have appointed you to act for them to consent to the processing of their personal data. This means that you have informed them of our identity and the purpose for which their personal data will be processed, namely to verify their name, address and date of birth. Where Scottish Widows receives notification affecting the legal ownership of the plan, or the appointment of an attorney under a Power of Attorney or other circumstances where there are new parties associated with the contract, the same process as set out above will apply.

**Please note that if we cannot confirm your name, address and date of birth by using a credit reference agency we may contact you to ask you to supply certain documents to verify this information.**

If you ask, we will tell you which credit reference agency we have used so you can get a copy of your details from them.

\* Please note we only use this agency to verify identity to fulfil anti-money laundering regulations and not to check credit worthiness.

## Summary Detailed Group Conflicts Policy

The Lloyds Banking Group has established and implemented a Conflicts Policy (which may be revised and updated from time to time) pursuant to FSA regulations, which sets out how we must seek to identify and manage all material conflicts of interest. Such conflicts of interest can occur in our day to day business activities, for example, where one of our clients could make a gain at the direct expense of another client, or we might be faced with an opportunity to make a gain but this would be to the direct disadvantage of one or more of our clients.

Depending on the exact nature of the conflict of interest involved, we may take certain actions in accordance with the Conflicts Policy to mitigate the potential impact of the conflict. Such actions may include putting in place controls between the opposing sides of the conflict, which may control or prevent the exchange of information, and/ or involve the appropriate management of staff activities and segregation of duties. Where such controls would be insufficient to eliminate the potential material risk of damage to clients from specific conflicts, then we will disclose the general nature and/or source of those conflicts of interest to you prior to us undertaking the relevant business.

If you wish to have further information on the Conflicts Policy, or on any specific conflict of interest that you think might affect you, please contact us.

## Categorising Your Business

We'll treat you as a 'retail client', unless we contact you to let you know otherwise. Retail clients are afforded the highest level of protection under the rules of our regulator, the Financial Services Authority (FSA). You should be aware that other organisations, including the Financial Ombudsman Service (FOS) and Financial Services Compensation Scheme (FSCS), may classify you differently. If they do, they may afford you lesser rights than those which normally apply to retail clients.



As part of the Lloyds Banking Group, Scottish Widows is proud to be an Official Provider of the London 2012 Olympic and Paralympic Games.

Scottish Widows plc. Registered in Scotland No. 199549. Registered Office in the United Kingdom at 69 Morrison Street, Edinburgh EH3 8YF. Telephone: 0131 655 6000.

Scottish Widows plc is authorised and regulated by the Financial Services Authority. Our FSA Register number is 191517.

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