



## Visitor Privacy Notice

This Privacy Notice explains how we collect, use and share your personal information. If you have any questions, please contact our Data Protection Officer using the contact details shown at the end of this document.

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## **1. What is the Visitor Privacy Notice?**

This Privacy Notice is for people who are not employed by the Phoenix Group and who visit any of our company's premises in:

- London
- Birmingham (Wythall)
- Edinburgh
- Dublin
- Telford
- Norwich
- Hitchin

It explains when and why we collect your personal information, how we use it, when we may share it with others and how we keep it secure. It also explains how you can get copies of the information we hold about you, and the choices you have about how we use your information.

The data controller responsible for how a visitor's personal information is collected and used is the Phoenix Group.

Personal information is information which can be used to identify who you are. Some types of personal information are more sensitive. More details about this type of information, referred to as special category data, is given in section 5.

## **2. What's your commitment to your visitors?**

At Phoenix Group we're committed to doing the following.

- ✓ Processing your personal information fairly and in line with data-protection laws and regulations such as the Data Protection Act 2018 and the General Data Protection Regulations (GDPR).
- ✓ Telling you about how we will collect and use your personal information.
- ✓ Only collect information from you when there is a 'lawful basis' to do so, as explained in section 3.
- ✓ Not keeping your personal information for longer than we need to, as explained in section 11.
- ✓ Keeping your personal information secure and limiting the people who can access it, as explained in section 7.
- ✓ Making sure that you know how to check your personal information and exercise your legal rights (for example, correcting information), as explained in sections 9 and 10.
- ✓ Making sure any person or organisation we share your information with keeps to data-protection laws and regulations, as explained in section 6.

### 3. What are the legal bases for processing personal information?

We will only collect, use and share your information if we have a valid legal reason, known as a legal basis, as set out in data-protection law. The main legal bases for using your information are as follows.

- **Legal obligation** – the processing is necessary for us to keep to the law.
- **Vital interest** – the processing is necessary to protect your or another person's life or safety.
- **Public interest** – the processing is necessary as it is in the public interest (for example, to prevent or detect fraud or criminal activities, or to exercise official authority that we have as the data controller).
- **Legitimate interest** – the processing is necessary for our legitimate interests (for example processing of access control data for security purposes) or those of a third party (unless these interests are overridden by your interests, rights or freedoms).
- **Consent** – you have given us permission to process your personal information for a specific purpose, such as visiting one of our offices.

### 4. What information do you collect and why?

We collect your personal information when you visit our premises, fill in forms, speak to us on the phone or use our apps and website. The types of personal information we collect about you are limited.

We need personal information so we can perform our duties and responsibilities to you, and to help us meet legal requirements. When we process personal information due to legitimate interests, we put measures in place to make sure your privacy is protected and that our legitimate interests do not override your interests or your data-protection rights.

The table below sets out examples of the types of information we may collect about you.

What information we collect	Examples of data collected	The lawful basis for collecting this information	Where we get this information from	When we collect this data	How long do we keep it
Basic personal details to help with your visit	Your name	Legitimate interest	From you	When you visit the building or arrange the visit	30 days from your visit
	The organisation you represent				
	Your vehicle's registration number				
Information to make sure your personal needs are met	Medical information so we can provide support for you getting into the building or design a personal evacuation plan	Legitimate interest and consent	From you	When you visit the building or arrange the visit	30 days from your visit
Information to make sure access to the building is secure	CCTV images	Legitimate interests	Phoenix Group Physical Security	During the site visit	30 days from your visit

We'll use your personal information for the purposes for which we collected it. If we need to use it for another reason, we'll only do so if that reason is similar to the original purpose. If we need to use your personal information for another purpose that's not related to the original reason we collected it for, we'll explain why. We can process personal information without your knowledge if we need to for legal reasons.

## 5. What is special category data?

Special category data is personal information that needs more protection because it is sensitive, such as information about your health. We'll only process special category data if this is necessary to help you visit us.

## 6. Who do you share personal information with?

Whenever we share your personal information, we do this in line with data-protection laws that are in place to keep your information safe and secure. The table below shows who we may share your personal information with.

Who do we share information with?	Why?
The person you are visiting The site facilities manager The site workplace manager	To allow them to manage and support you during your visit
Other Phoenix companies and departments	To meet our regulatory and legal obligations, such as to protect your and other people's health and safety

Organisations and people that provide services to us (third-party service providers) take appropriate security measures to protect your personal information. We don't allow our third-party service providers to use your personal information for their own purposes. We only allow them to process it for specified purposes and in line with our instructions.

## 7. Where do you hold and store personal information?

Information will be recorded on security systems and systems maintained at the first point of contact in our buildings. This includes CCTV recordings, visitor databases and records (for example, where you have to sign in to a building). Access to the systems is carefully managed and only given to people who need it.

## 8. What if I don't provide personal information?

We try not to ask you for personal information that we don't need. If you don't provide information which we need, you may not be able to enter our buildings.

## 9. My rights

You have legal rights relating to your personal information. We have explained your rights below, but to keep things simple we have not included all the circumstances or conditions which apply to them.

- **The right to object to us using your personal information**

In certain circumstances you can ask us to stop using your information, or to stop using it for specific purposes. If we can stop using your information we will, but sometimes we must use your information for legal reasons, which we will explain to you.

- **The right to get copies of your personal information** (the right of access)

You have the right to ask for a copy of the information that we hold about you, and we will usually provide this free of charge. (We only charge a fee in exceptional circumstances.)

For your security, we will take reasonable steps to confirm your identity before providing any personal information we may have about you. If a third party asks us for information on your behalf, we'll ask you to confirm that you're happy for us to give them the information.

- **The right to have your personal information corrected** (the right to rectification)

You have the right to have your personal details updated if they are wrong.

- **The right to get your personal information deleted** (the right to be forgotten)

In certain circumstances you can ask us to delete your personal information. If we can't delete your information for any reason, we'll explain why.

If you want to exercise any of these rights, please contact the Phoenix Premises Department by emailing [arc\\_security@standardlife.com](mailto:arc_security@standardlife.com) or by phoning 0131 245 7984. If the right is limited for any reason, or doesn't apply, we will explain why.

## 10. How to update my information

It is important that the information we hold about you is accurate and up to date. Please let us know if your details change, or the information we hold about you is incorrect.

### **11. How long do you keep my information for**

We will only keep your personal information for as long as we need it to meet our legal responsibilities.

We will delete your personal information when we no longer need it for the purpose we collected it for. If there is information which we cannot remove from our systems, we'll prevent it from being used for any purpose.

### **12. How do I contact you**

If you have any questions or concerns about how we use your information, or would like a copy of the information we hold about you, please email us at [DataProtection@thephoenixgroup.com](mailto:DataProtection@thephoenixgroup.com).

### **13. How to make a complaint**

If you are not happy with how we use your personal information, please email us at [DataProtection@thephoenixgroup.com](mailto:DataProtection@thephoenixgroup.com).

You also have the right to complain to the Information Commissioner's Office. You can phone their helpline on 0303 123 1113 or visit their website at [www.ico.org.uk](http://www.ico.org.uk) for more information.

Information Commissioner's Office (UK)  
Wycliffe House  
Water Lane, Wilmslow  
Cheshire  
SK9 5AF

Data Protection Commission (SLINTL)  
21 Fitzwilliam Square South  
Dublin  
Ireland  
D02 RD28

14. Changing this privacy notice

We may change this privacy notice from time to time to keep it up to date, or to keep to relevant laws.

Revision history

VERSION	DATE	REASON
V1	March 2025	Document created and published