

LIVE LIFE RETIREMENT LTD GENERAL PRIVACY NOTICE

1 INTRODUCTION

- 1.1 We are committed to protecting and respecting your privacy. Live Life Retirement is an advice service. In this privacy notice, references to “**we**”, “**us**” or “**our**” is a reference to Live Life Retirement Ltd
- 1.2 This privacy notice deals with any personal data we process. It sets out the basis on which any personal data we collect from you is handled by us in the course of our relationship with you. For example, this notice applies to you if you are a potential recruit, employee, customer or potential customer, corporate partner or potential corporate partner, trustee, supplier or potential supplier.
- 1.3 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.4 For the purposes of the General Data Protection Regulation 2016/679 (“**GDPR**”), Live Life Retirement is the data controller and our office is City Gates 2-4 Southgate Chichester West Sussex PO19 8DJ
- 1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

2 INFORMATION WE COLLECT ABOUT YOU

Information you give us

- 2.1 You may give us personal data about you, in a number of ways; these include:
- 2.1.1 during an interview or meeting;
 - 2.1.2 corresponding with us by phone, e-mail or post; and
 - 2.1.3 sending information directly to us, or providing information as requested by us and/or which is necessary from time to time
 - 2.1.4 Publicising information into public domain.
- 2.2 The information you give us may include the following information about you:
- 2.2.1 your name and other personal details such as date of birth and title;
 - 2.2.2 your email address;
 - 2.2.3 your photograph;

- 2.2.4 contact details (including home or work address, e-mail address [work and/or home], and mobile, home and/or work phone number);

Cookies & other technical information we collect about you when you visit our website

- 2.3 With regard to each of your visits to our website we may automatically collect the following information:
 - 2.3.1 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - 2.3.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.
 - 2.3.3 We use cookies and similar software tools such as HTML5 Storage or Local Shared Objects to identify your interests and particularly popular areas of our websites and use this information to improve the design of our websites and make them even more user-friendly. For the same purposes we use the analysis tools Google Analytics.
 - 2.3.4 Cookies are small files stored on your desktop, laptop or mobile device by websites visited by you. They help us identify whether there has already been any contact between your device and our websites as well as what language or other settings you prefer. Cookies can also contain personal information. If you use our websites, you consent to the use of cookies.
- 2.4 Our website may contain links to and from the websites of our partner networks, funders, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this notice and may have their own privacy notices. We do not accept any responsibility or liability for these notices. Please check any third party privacy notices before you submit any personal data to these websites.
- 2.5 Additionally, our website uses Google Analytics, a service which transmits website traffic data to Google servers based in the United States. Google Analytics does not identify individual users or associate your IP address with any other data that may be held by Google. We only use reports provided by Google Analytics to help us understand website traffic and webpage usage.
- 2.6 To opt out of Google Analytics, you can download the following plugin from Google, available for use on most internet browsers: <https://tools.google.com/dlpage/gaoptout?hl=en>

Information we receive from other sources

- 2.7 We may be working closely with third parties (including, for example, corporate partners, payment and delivery services) and may receive information about you from them.

3 USES MADE OF THE INFORMATION

Information you give to us

- 3.1 We will use the information you give to us in order to carry out the following activities (as applicable to our relationship with you):

3.1.1 promote the objects and interest of our programmes, ensure the most efficient management of Live Life Retirement and ensure that Live Life Retirement's legal obligations are adhered to;

3.1.2 to store this information on our information management system/s;

3.1.3 to enforce our terms of use with you or any other contract we may have with you;

3.1.4 to enable us to receive your services

- 3.2 In order to carry out the activities referred to in paragraph 3.1, we may rely on software applications and other technology to process personal data about you. These include databases and our finance systems. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your information is kept secure.

- 3.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us or receive the services we request from you. For example, we may be recruiting you for a role at Live Life Retirement or engaging you to supply us with services and will use personal data where necessary to recruit you or receive your services.

- 3.4 In addition, we may be required by law to do the following (which is not an exhaustive list):

3.4.1 keep an accounting record of payment; and

3.4.2 keep a record to evidence fair recruitment processes.

- 3.5 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Representative.

Information we may collect about you from our website

- 3.6 We will use this information for the following legitimate interests:

3.6.1 to contact you if you have made an enquiry about one of our current, past or future offerings;

- 3.6.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 3.6.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;
- 3.6.4 as part of our efforts to keep our website safe and secure.

Information we receive from other sources

- 3.7 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a reference from a previous employer relating to you, which may impact a recruitment decision.

Where we store your Personal Information

- 3.8 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Life Life Retirement will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

When we disclose information

- 3.9 In order to pursue one of the legitimate interests set out above, we may share your personal information with:
 - 3.9.1 People engaged to work on behalf of Live Life Retirement for example our Freelance Facilitators;
 - 3.9.2 local authorities, and other government bodies when necessary.
 - 3.9.3 corporate partners, professional advisors, suppliers and sub-contractors for the performance of any contract or agreement we enter into with them or you.
- 3.10 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our contract (between us and you) and other agreements.
- 3.11 One such partner we share your data with would be PayPal, who process payments on our behalf. To see their privacy notice, please click this link:

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

Where we need to get your consent

- 3.12 We will not market our services to you without your consent and you have the right to ask us not to use your contact details for marketing. Please contact info@liveliferetirement.com if you no longer wish to be contacted by us.

4 YOUR RIGHTS

4.1 Under the GDPR, you have the following rights:

- 4.1.1 **The right to correction.** You have the right to have inaccurate personal data about you rectified.
- 4.1.2 **The right to erasure.** You have the right to request that we delete your personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing; (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.
- 4.1.3 **The right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing
- 4.1.4 **The right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third party organisation.
- 4.1.5 **The right to object.** You have the right to raise an objection to any of our processing in paragraph 4.6. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.
- 4.1.6 **The right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.
- 4.1.7 **The right to complain to the ICO.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office. You will find further information on how to do this further on in this notice.
- 4.1.8 **The right to request access.** You have the right to access personal data we hold about you.

Should you wish to exercise any of the rights listed above, please contact us on the following email address: info@liveliferetirement.com

5 HOW LONG WE KEEP PERSONAL INFORMATION

- 5.1 We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.
- 5.2 We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection Representative (see paragraph 7.1).

6 USE OF OUR WEBSITE

- 6.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7 CONTACT US

- 7.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to our Data Protection Representative at:

Live Life Retirement Limited
Data Protection Representative
City Gates
2-4 Southgate
Chichester
West Sussex
PO19 8DJ

Email: info@liveliferetirement.com

8 MAKING A COMPLAINT

- 8.1 If you are unhappy with the way that we have processed or handled your data then you have a right to complain to the Information Commissioner's Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom. The contact details for the Information Commissioner's Office are:
- 8.2 Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
- 8.3 Telephone: 0303 123 1113
- 8.4 Website: <https://ico.org.uk/concerns/>

9 CHANGES TO OUR PRIVACY NOTICE

- 9.1 Any changes we make to this privacy notice in the future will be posted on our website and, where possible and appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.