

Right to Erasure Policy

Introduction

GDPR regulates the way in which all personal data is held and processed. This is a statement of the Right to Erasure policy adopted by Life Financial Services. It applies to all its employees.

Purpose

The purpose of this policy is to ensure that everyone handling personal information at Life Financial Services is fully aware of the requirements of GDPR and complies with data protection procedures and that data subjects are aware of their rights under GDPR.

Scope: information covered by GDPR

'Personal data' covered by GDPR is essentially any recorded information which identifies a living individual. Personal data held by Life Financial Services will include contact information for a variety of stakeholders and other personal data.

Safety & Security

A key role as Service Provider is the introduction of our staff and our clients to members of the public, we therefore have a duty of care to ensure the safety of all involved. Our staff are therefore required to record the full contact details of all participants involved in a transaction.

Right to Erasure (i.e. the right to be forgotten)

When consumers provide us with personal information we will only retain it for as long as we need to, thus to ensure we have dealt with all aspects of the enquiry or complaint. In practice, this means that we are legally required to retain data. Once a consumer has been supplied information in our industry a 'transaction' has taken place. This being the primary reason for which data may be retained in accordance with the regulations.

Life Financial Services has a secondary legal requirement to retain data for the provision of data to public authorities & in order to comply with legislation or regulations included but not limited to those listed below.

- The Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001 & the Terrorism Act 2006)
- The Proceeds of Crime Act 2002 (as amended by the Crime and Courts Act 2013 and the Serious Crime Act 2015)
- Consumers, Estate Agents and Redress Act 2007
- Estate Agents Act 1979
- Immigration Act 2014
- The Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013
- The Consumer Protection from Unfair Trading Regulations 2008
- Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Criminal Finances Act 2017

We therefore adopt a policy on request of Right to Erasure that the data is put 'beyond use'. The data is anonymised & frozen within our system; this means that apart from the Data Protection Officers, the data will no longer appear to exist to all other members of staff, or be visible on any of our computer systems save for, the automated system checks carried out, which are compulsory in order for us to ensure they are not contacted again if they have asked not be contacted or marketed to.

Retention Policy

We wish to keep consumers advised of our services and therefore retain data for marketing purposes. From time to time consumers request that we stop providing them with information about our services.

In the event that this request is made then the data is anonymised & frozen within our system and put 'beyond use'; this means that apart from the Data Protection Officers, the data will no longer appear to exist to all other members of staff, or be visible on any of our computer systems save for, the automated system checks carried out, which are compulsory in order for us to ensure they are not contacted again if they have asked not to be contacted or marketed to.

We have been advised by the ICO to have a granular [Data Retention Matrix](#).

From time to time consumers ask that their data be deleted.

Once a consumer's data falls outside of our Legal Retention periods', a consumer may insist that their data is deleted. As far as is reasonably possible we will delete the data and advise the consumer that as we acquire data from various legitimate sources, their contact details may be purchased and added back into our database which may therefore mean that they could be contacted in a future marketing campaign. At that point, they would be required to submit a request to invoke the companies Right to Erasure Procedure contained herein. As part of this procedure a consumer can either choose the right to be forgotten whereby their data is anonymised and frozen or insist their data be deleted again.

In the unfortunate event that we have a legal requirement to produce data by the courts, the police or other public authority, that request should be made in writing to The Data Protection Officers, details of which can be found below and/or on our website.

The Data Protection Officers will facilitate the unfreezing of the data within the system to comply with the public authorities to produce said data.

Responsibility for Life Financial Services' compliance with GDPR

Life Financial Services' Data Protection Officer reports on any data protection matters to the Company, but the individual members of staff are responsible for the proper use of the data they process.

Policy Statement

The principles of GDPR require that personal information must:

- be processed fairly and lawfully;
- not be used for a purpose for which it was not collected;
- be adequate, relevant and not excessive for the purpose;
- be accurate and up-to-date;
- not be kept longer than necessary;
- be processed in accordance with the data subject's rights;
- be kept secure and protected from unauthorised processing, loss or destruction; and
- be transferred only to those countries outside the European Economic Area that provide adequate protection for personal information.

In order to meet the requirements of the principles Life Financial Services will:

- fully observe conditions regarding the fair collection and use of information;

- meet its legal obligations to specify the purposes for which information is used;
- collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- ensure the quality of the information used;
- hold personal information on Life Financial Services' systems for as long as is necessary for the relevant purpose, or as long as is set out in any relevant contract held with Life Financial Services;
- ensure that the rights of people about whom information is held can be fully exercised under GDPR (these include: the right to be informed that processing is being undertaken; the data subject's right of access to their personal information; the right to prevent processing in certain circumstances; the right to correct, rectify, block or erase information which is regarded as wrong information);
- take appropriate technical and organisational security measures to safeguard personal information; and
- ensure that personal information is not transferred outside the EEA without suitable safeguards.

Staff Responsibilities for Right to Erasure

Life Financial Services will ensure that there is someone with specific responsibility for data protection in the organisation. The nominated person is the Data Protection Officer. The Data Protection Officer may be contacted at:

Data Protection Officer
Life Financial Services
One Station Square
Bracknell
RG12 1QB

Email: directors@lifefinancialservices.co.uk

Life Financial Services will ensure that:

- everyone managing and handling personal information understands that they are responsible for following good data protection practice;
- this policy is available to each member of staff;
- everyone managing and handling personal information is appropriately trained and supervised; and
- queries about handling personal information are promptly and courteously dealt with and clear information is available to all staff

Privacy

Life Financial Services respects consumers' privacy. The information that consumers provide us with, or that is gathered automatically, helps us to monitor our services and provide consumers with the most relevant information.

Complaints Procedure

Life Financial Services aims to comply fully with its obligations under GDPR. If consumers have any questions or concerns regarding Life Financial Services' management of personal data, including their right to access data about them, or if they consider Life Financial Services holds inaccurate information about them, they should contact Life Financial Services' Data Protection Officer.

If consumers have any questions or concerns have not been dealt with adequately or that a subject access request they have made to Life Financial Services has not been fulfilled they avail themselves of the Life Financial Services complaints procedure.

If consumers are still dissatisfied, they have the right to contact the office of the Information Commissioner, the independent body overseeing compliance with GDPR: <http://ico.org.uk>.