

# Vitality Data Privacy Notice – Third Party recipients of data

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## Vitality Group

### Parent Company

Vitality is part of the Discovery Group of companies and is owned by Discovery Limited, a financial services firm based in South Africa. As part of this relationship, Discovery undertakes several business processes on behalf of Vitality. Such processes include underwriting and claims administration services. The delivery of such services requires Vitality to share data relating to its customers with Discovery.

Third Party:	Description:	Data Role:	Jurisdiction
Discovery Limited	Business Processing Services	Data Processor	South Africa

### Business Processing

Outsourced business processing for the Claims and Rewards, providing additional resource for internal operational areas to ensure and maintain Customer Service levels.

Third Party:	Description:	Data Role:	Jurisdiction
Teleperformance Limited	Quotes and Claims administration	Data Processor	United Kingdom

### Customer Service

Vitality offers customers several ways to get in touch either via phone or online. These communication channels are provided via third parties who will have access to customer data during the contact between the customer and Vitality.

Third Party:	Description:	Data Role:	Jurisdiction
Noble Systems UK Limited	IVR, Call recording, and Outbound dialling.	Data Processor	United Kingdom
Wysa Limited	Access to the Wysa App for Vitality Members – Mental Health Support via Alguided listening.	Data Processor	United Kingdom

### Customer Relationship Management

To help us manage our relationships with customers Vitality makes use of third-party customer relationship management systems. These store key contact information about our customers so that we can effectively communicate and service our customers.

Third Party:	Description:	Data Role:	Jurisdiction
Microsoft Ireland Operations Limited	OS365, CRM System	Data Processor	Europe
Quality System Solutions - Five CRM	CRM System	Data Processor	Germany
Salesforce.com EMEA Limited	CRM System	Data Processor	Germany, France and USA

## Customer Complaints

If you make a complaint that we cannot resolve, you may choose to refer it to the relevant Regulator to review. In these cases, we will share your data pertaining to the complaint with that Regulator.

Third Party:	Description:	Data Role:	Jurisdiction:
Financial Ombudsman Service Limited	Financial Services Regulator	Data Controller	United Kingdom
Information Commissioners Office	Data Protection Regulator	Data Controller	United Kingdom

## Customer Surveys

From time-to-time Vitality might need to ask you to provide information to us whether in relation to your policy, to assess customer satisfaction, or for market research purposes. Vitality uses third parties to facilitate the gathering of this information.

Third Party:	Description:	Data Role:	Jurisdiction
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## Customer Satisfaction

Vitality strives to offer the best possible service to its customers. We use third parties to gather and respond to feedback from our customers to help us improve our services. At times we may need to share customer data with such third parties.

Third Party:	Description:	Data Role:	Jurisdiction
SocialRel8 Limited t/a Evaluagent	Customer feedback tool	Data Processor	United Kingdom and Europe
Medallia, Inc	Customer feedback tool	Data Processor	United Kingdom and Europe
Trustpilot A/S	Customer review services	Data Processor	United Kingdom

## Customer Validation

When you apply for one of our products, we may use third parties to carry out certain checks on you. These checks may concern your identity, credit status, or with respect to anti-money laundering, fraud, and sanctions. We do this to ensure Vitality complies with all applicable legislation and regulation with respect to financial crime.

Third Party:	Description:	Data Role:	Jurisdiction
RELX (UK) Limited - LexisNexis Risk Solutions	Anti-money laundering checking services	Data Controller	United Kingdom

## Customer Signatures

During the course of purchasing one of our products we may require you to sign certain documents, such as application forms. Sometimes this may involve signing a document electronically. The electronic signature process is provided via a third party who will process information on behalf of Vitality.

Third Party:	Description:	Data Role:	Jurisdiction
DocuSign Inc.	Electronic signature services	Data Controller	Amsterdam, Paris and Frankfurt

## Marketing Support

To market our services to customers we make use of several marketing agencies who support us with customer communications and fulfilment of customer offers. These agencies, while providing these services, will have access to customer data.

Third Party:	Description:	Data Role:	Jurisdiction
Advertise Purple Inc	Digital Marketing Services	Data Controller	USA
BrandPipe Limited	Digital Marketing Services	Data Processor	United Kingdom
Buyapowa Limited	Gift Voucher Supplier	Data Processor	United Kingdom
Catalyst Marketing Services Ltd	Creative Marketing Services	Data Processor	United Kingdom
Chickpea Los Angeles LLC APV Media Ltd	Digital Marketing Services	Data Processor	United Kingdom
Experian Limited	Marketing Data Services	Data Processor	United Kingdom
Fresh Egg Limited	Digital Marketing Services	Data Controller	United Kingdom
Lucky Beard Limited	Digital Marketing Services	Data Processor	United Kingdom
Merkle UK Three Ltd (t/a Periscopix	Digital Analytics Service	Data Processor	United Kingdom
MBPA Ltd T/A Space 01	Creative Marketing Services	Data Controller	United Kingdom
Optalitix Limited	Customer Insight Services	Data Processor	United Kingdom
Optimise Media (Uk) Ltd	Voucher fulfilment services	Data Processor	United Kingdom
Rocket Science Group t/a MailChimp	Marketing Automation services	Data Processor	USA

## Printing & Mail

To manage our printed customer communications Vitality uses third parties to manage its document printing and scanning needs. These third parties will have access to customer information contained in the correspondence, such as letters, sent to and from Vitality.

Third Party:	Description:	Data Role:	Jurisdiction
Capita Business Services Limited	Inbound mail scanning	Data Processor	United Kingdom
Mosaic Print Management Ltd	Outbound printing and storage	Data Controller	United Kingdom
Real Digital International Limited	Outbound printing	Data Processor	United Kingdom

## Archive, Back-up, and Disaster Recovery Services

Vitality has several measures in place to ensure that it can safely store, destroy, and always recover data. Many of these measures are supported by third parties who store and dispose of data on behalf of Vitality.

Third Party:	Description:	Data Role:	Jurisdiction
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Ilron Mountain UK PLC	Back-up tape services	Data Processor	United Kingdom
JOHN BRADSHAW AND SON LIMITED - BCL	Archiving Services	Data Controller	United Kingdom
Shred-it Limited	Confidential information disposal	Data Processor	United Kingdom

### Legal Services

From time-to-time Vitality may engage external legal support with respect to a claim or complaint by a customer. As part of this we may share the customer's data with the legal firm for the purposes of resolving the claim or complaint. Vitality will only ever engage a legal firm of good repute that can demonstrate it takes the data protection as seriously as we do.

### Brokers & Financial Intermediaries

If you have appointed an insurance adviser, we will send them copies of correspondence relating to the plan and any renewal documentation. We may disclose information about a claim to them, although no medical information will be provided without your consent. Your information, and that of others also covered by the plan, may be disclosed to other parties (for example other insurance companies) with a view to preventing fraudulent or improper claims.

### Lead Generation

To help grow its business, Vitality engages third parties who provide telemarketing, lead generation, appointment setting and access to marketing databases. Use of such services involves the sharing of personal data. Vitality endeavours to only work with third parties who act with integrity and respect the privacy and security of personal data.

Third Party:	Description:	Data Role:	Jurisdiction
Seed Data Solutions Limited	Lead Generation Services	Data Processor	United Kingdom

### Payment Services

To make and receive payments from our customers Vitality utilises a number of third-party payment services. These third parties will have access to customer data to process payments.

Third Party:	Description:	Data Role:	Jurisdiction
Bottomline Technologies Limited	BACS payment services	Data Processor	United Kingdom

### Insurance & Re-insurance

To mitigate against risk, Vitality has in place a wide range of insurance and re-insurance policies underwritten by third parties. In the event of Vitality making a claim against any of these policies it may be necessary to share data relating to a customer who is involved in the claim. In such cases Vitality will limit any data shared with the third party to only that which is required to settle the claim.

### Financial Services Regulators

Vitality is regulated by the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA). At times we may need to share data about our customers with them to comply with industry regulations.

Third Party:	Description:	Data Role:	Jurisdiction:
The Financial Conduct Authority	Financial Services Regulator	Data Controller	United Kingdom
The Prudential Regulation Authority	Financial Services Regulator	Data Controller	United Kingdom

### Auditors

As a regulated firm, Vitality is required to appoint an auditor to do an annual external audit on our accounts. During this audit we may be required to share data relating to our customers with the auditors for the purposes of validating our internal accounting procedures and our published financial results.

Third Party:	Description:	Data Role:	Jurisdiction:
Tern Consultancy LTD	Audit Services	Data Processor	United Kingdom

### Debt Recovery

At times Vitality may require the services of third-party debt recovery specialists to collect monies lawfully owed to Vitality. Use of these services will require the third party to have access to the personal data of the debtor. Vitality will only use debt recovery third parties of good repute who adhere to the standards set by the debt recovery sector.

Third Party:	Description:	Data Role:	Jurisdiction:
CCI Credit Management Limited	Debt Recovery Services	Data Controller	United Kingdom
Oriel Collections Ltd	Debt Recovery Services	Data Processor	United Kingdom

### IT Support

Vitality operates an extensive network of IT systems. To support and maintain this network Vitality makes use of third-party providers. While providing IT support these third parties may have indirect access to view customer data. Vitality will ensure careful control and supervision of any such access and will only use IT support third parties of good repute.

Third Party:	Description:	Data Role:	Jurisdiction:
Amazon Web Services	Cloud Computing	Data Processor	Ireland
Business Systems (UK) Limited	IT Support	Data Processor	United Kingdom
Cogent Communications UK Ltd	Data Network Service	Data Processor	United Kingdom
Collibra UK Ltd	Data Intelligence Platform and professional services	Data Processor	United Kingdom
Crayon Ltd	Software Asset Management	Data Controller	United Kingdom
Decision Analysis Services Ltd	IT Support	Data Processor	United Kingdom
DST Process Solutions Limited	Operations Workflow	Data Processor	United Kingdom
Earnix UK Limited	Pricing Engine	Data Processor	Europe, Israel
Davies Group	Speech Analytics Services	Data Controller	United Kingdom

F2X Group Ltd t/a Instanda	Insurance Provisioning Platform (Instanda)	Data Processor	United Kingdom
Fair Isaac Service Ltd	Decision Rules Management System	Data Controller	United Kingdom
Kubrick Group Ltd	Consultants to work within the Data Space, data management platform/cataloguing	Data Processor	United Kingdom
Fuel50 UK Ltd	Internal Talent Marketplace	Data Controller	United Kingdom
Mixpanel Inc	Analytics tool relating to Member app	Data Controller	USA
MONSTARLAB UK LIMITED	App design, build and hosting	Data Processor	United Kingdom
Munich Re Automation Solutions Ltd	Rules Engine Platform for Policy Pricing	Data Processor	United Kingdom
Revo 4Me Services Ltd	IT Self Service Portal	Data Controller	United Kingdom and Netherlands
Stonly SAS	Content creation platform, knowledge base software	Data Processor	USA
Tata Consultancy Services Ltd	Application Development and Support	Data Processor	Europe and India
The Capital Markets Company (UK) Limited (CAPCO)	Business and technology consulting services	Data Processor	United Kingdom
Virgin Media Business	Data Network Service	Data Processor	United Kingdom
Vitality Group International Inc	Member Activity Data	Data Controller	United Kingdom and South Africa
Zayo Group UK Limited	Data Network Services	Data Controller	United Kingdom

## Regulators and fraud prevention and detection agencies

We may use your personal information to help us to detect and prevent fraudulent applications and claims, fight financial crime and meet our regulatory responsibilities. We may also share your information and undertake searches with third party organisations such as police, public bodies, credit reference agencies, fraud prevention agencies and our regulators (which include the **FCA**, **PRA** and **ICO**).

## Recruitment

As part of our recruitment process, we may collect this information in a variety of way, either directly from applicants, or sometimes via an employment agency, a 3<sup>rd</sup> party outsource, assessment provider or background check provider (as applicable).

Third Party:	Description:	Data Role:	Jurisdiction:
Artic Shores Limited	Recruitment, Assessments	Data Processor	United Kingdom

ITS Software Systems Ltd t/a Eploy	Applicant Tracking System (ATS) and CRM to support recruitment	Data Processor	United Kingdom
Reed Specialist Recruitment Limited	Screening Solution	Data Controller	United Kingdom
Resource Solutions Limited	Recruitment Process Outsourcing	Data Processor	United Kingdom, South Africa, USA
JVR Consulting Psychologists (Pty) Limited	Recruitment Assessments	Data Processor	South Africa, USA,

## VitalityCar

### Technology and Analytics Suppliers

When you participate in the Good Driving programme, we receive information on your driving behaviour and habits from our technology and analytics providers. We use your driving information to assess the terms on which cover may be offered and your driving habits may affect your premium

Third Party:	Description:	Data Role:	Jurisdiction:
Cambridge Mobile Telematics	Good Driving Programme	Data Processor	United Kingdom
RELX (UK) Limited - LexisNexis Risk Solutions	Member Validation Services	Data Processor	United Kingdom and USA

# VitalityHealth

## GP Services

Vitality offers both face-to-face and telephone GP services. These are maintained and operated by third parties on behalf of Vitality. Should you choose to make use of any of these services your data will be shared with these third parties.

Third Party:	Description:	Data Role:	Jurisdiction:
Digital Medical Supply UK Limited - LIVI	GP App and GP network services	Data Controller	United Kingdom and Sweden
Doctap Limited	GP Services	Data Controller	United Kingdom
The Doctors Clinic Group Limited	GP Services	Data Controller	United Kingdom
Nuffield Health	GP Services	Data Controller	United Kingdom
Roodlane Medical Limited	GP Services	Data Controller	United Kingdom

## Consultants & Therapists

During the course of a claim, you may need to see a consultant or therapist for diagnosis, treatment planning, or treatment. This may include specialists in areas such as cardiology, endocrinology, physiotherapy, and cognitive behavioural therapy. In such cases Vitality may share your data with the consultant or therapist for the purposes of supporting your treatment in line with the terms of your policy. Such consultants and therapists are Data Controllers in their own right.

Vitality uses several third parties who provide access to a network of therapists and consultants. Vitality may share your data with these third parties for the purposes of facilitating your diagnosis, treatment planning, or treatment. These third parties are:

Third Party:	Description:	Data Role:	Jurisdiction:
Alliance Surgical PLC	Consultant network and claims administration	Data Controller	United Kingdom
AlivCor Limited	Medical advice to customers	Data Controller	United Kingdom
Ascenti Health Limited	Physiotherapy network	Data Controller	United Kingdom
Complex Spine London Ltd	Spinal 2 <sup>nd</sup> Opinion Service	Data Controller	United Kingdom
Doctify Limited	Specialist Booking Portal	Data Controller	United Kingdom
IPRS Health Limited	Physiotherapy network	Data Controller	United Kingdom
Mindler Ltd	Cognitive Behavioural Therapy network	Data Controller	United Kingdom
Nuffield Health	Physiotherapy and Cognitive Behavioural Therapy network	Data Controller	United Kingdom
Peppy Health Limited	Medical Advice	Data Controller	United Kingdom
Streamline Surgical LLP	Bariatric Services	Data Controller	United Kingdom



Supportive Care UK Limited	Palliative Care Support	Data Controller	United Kingdom
Togetherall Ltd	Self-help therapy Services.	Data Controller	United Kingdom

### Diagnosis and Laboratory Testing

As part of your claim, you may need specialist diagnosis or laboratory testing to be undertaken. Vitality will use specialist third parties to fulfil this which will require personal data to be shared with such third parties.

If you require a further testing, you may be referred to a specialist third party who will undertake this check. This third party will collect personal data from you to carry out this service.

Third Party:	Description:	Data Role:	Jurisdiction:
Check4Cancer Limited	Screening services	Data Controller	United Kingdom
Skin Analytics	Skin checking services	Data Controller	United Kingdom

### Hospitals

If you require hospital treatment, Vitality may share your data with the hospital for the purposes of providing you with appropriate care and treatment in line with the terms of your policy.

### Medical Billing

Any consultants, therapists, or hospitals that you visit during a claim will bill Vitality for their services. This billing is conducted through an industry standard electronic billing platform. Your personal data is shared with the billing platform provider to facilitate this. Vitality also use an outsourced provider to support administration of claims, including invoice processing services.

Third Party:	Description:	Data Role:	Jurisdiction:
Healthcode Limited	Medical eBilling	Data Processor	United Kingdom
Teleperformance Global Services UK Limited	Quotes and Claims administration	Data Processor	India

### Legal Expenses Claims Management

Vitality uses a third party to provide the Legal Expenses cover included in our PMI products. Data will be shared with the third party in the event that you make use of this cover.

Third Party:	Description:	Data Role:	Jurisdiction:
DAS Legal Expenses Insurance Company Limited	Claims Management	Data Controller	United Kingdom

### Travel Assistance Claims Management

Vitality uses a third party to provide the Travel Assistance cover included in our PMI products. Data will be shared with the third party if you make use of this cover.

Third Party:	Description:	Data Role:	Jurisdiction:
CEGA Group Services Limited	Claims Management	Data Controller	United Kingdom

### Corporate Wellness Days

Vitality carries out Wellness Days with several of our corporate customers. As part of these client staff may undertake a medical assessment. These assessments are carried out by a third party who will have access to personal data to perform the medical assessment.

Third Party:	Description:	Data Role:	Jurisdiction:
Bluecrest Health Screening Limited	Medical Assessments	Data Controller	United Kingdom

### Corporate Employee Assistance Programme

If you have a policy with us via your employer, you may be eligible to make use of our Corporate Employee Assistance services. These services are undertaken by a third party who will collect data from you to perform the service.

Third Party:	Description:	Data Role:	Jurisdiction:
Health Assured Ltd	Employee Assistance Programme	Data Controller	United Kingdom

### Trust Services

We offer corporate customers the option to set up a trust scheme to provide health insurance benefits to their employees. Vitality engages a third party to provide administration services for these trusts. If you are an employee who is part of such a scheme, then this third party will have access to your personal data.

Third Party:	Description:	Data Role:	Jurisdiction:
Zedra Governance Limited	Trust Administration Services	Data Controller	United Kingdom

### Britain's Healthiest Workplace

Britain's Healthiest Workplace aims to study the link between modifiable health risks and short-term productivity, develop a common understanding of what employee health and wellbeing means, and establish a common set of standards that can be applied to all industries. Vitality uses a third party to support this study. If you take part in the study your data will be shared with this third party.

Third Party:	Description:	Data Role:	Jurisdiction:
RAND Europe	Survey services	Data Controller	USA

# VitalityLife

## Medical Assessment

As part of applying for one of our products we may require you to undergo a medical assessment. If so, we will share data with the third party who will undertake the assessment on behalf of Vitality.

Third Party:	Description:	Data Role:	Jurisdiction:
Inuvi Health Limited	Medical screening	Data Processor	United Kingdom

## Laboratory Testing

As part of your Medical Assessment, you may need specialist laboratory testing to be undertaken. Vitality will use specialist third parties to fulfil this which will require personal data to be shared with such third parties.

Third Party:	Description:	Data Role:	Jurisdiction:
SYNLab Laboratory Services Limited	Laboratory Services	Data Controller	United Kingdom

## Sales

Third Party:	Description:	Data Role:	Jurisdiction:
Iress Portal Ltd	Sales Portal	Data Controller	United Kingdom
iPipeline Limited	Sales Portal	Data Controller	United Kingdom
Towers Watson Software Limited	Pricing Engine	Data Processor	United Kingdom and South Africa
UnderwriteMe Limited	Sales Portal	Data Controller	United Kingdom

## Claims Validation

If you make a claim with us we may need to ask you to undergo certain checks or assessments, including your ability to return to work following a period of illness. In such cases we will share your data with the third party who will undertake the assessment on behalf of Vitality.

Third Party:	Description	Data Role:	Jurisdiction:
Form Health (UK) Limited	Claims assessment services	Data Controller	United Kingdom
Obair Associates Limited	Medical evidence collection	Data Controller	United Kingdom

## Investigations

In certain circumstances we may engage third party investigators to examine the circumstances of a claim as part of our commitment to combatting fraud. The use of investigators may include the sharing of personal data to help the investigation. Vitality will only ever engage investigators of good repute who share our commitment to the security of personal data.

## Funeral Services

Certain of our Life products have the option of adding funeral cover which will pay a lump sum towards funeral costs. Vitality uses a third party to arrange and manage this cover. If you choose this option, your data will be shared with the third party in order to arrange your cover.

Third Party:	Description	Data Role:	Jurisdiction:
Golden Charter Limited	Funeral Planning Services	Data Controller	United Kingdom

# VitalityInvest

## Investment Platform

Vitality's investment products are accessed and managed via an investment platform hosted and maintained by a third party. Your use of this platform will necessitate the sharing of personal data with the third party.

Third Party:	Description:	Data Role:	Jurisdiction:
GBST Holdings Limited	Investment platform	Data Processor	United Kingdom

## Fund Management

We make use of third-party fund managers to manage your investments. While managing your investments we may share your data with the fund managers. Any fund managers we use are carefully selected to ensure they share our commitment to the security of personal data.

## Payment Services

In order to make and receive payments from our customers Vitality utilises a number of third-party payment services. These third parties will have access to customer data to process payments.

Third Party:	Description	Data Role:	Jurisdiction:
Worldpay (UK) Limited	Payment Services	Data Controller	United Kingdom, Singapore, and USA
Worldpay AP Limited	Payment Services	Data Processor	United Kingdom, Singapore, and USA
Worldpay Limited	Payment Services	Data Processor	United Kingdom, Singapore, and USA

## Vitality Rewards & Partners

Rewards and benefits are available with VitalityHealth and certain VitalityLife and Vitality Healthy Workplace products. These benefits are provided by third party Partners. If you chose to take advantage of any of these benefits your data may be passed to the Partner to provide the benefit. The full list of Partners is described below:

### Fitness:

Third Party:	Description:	Data Role:	Jurisdiction:
Nuffield Health Fitness & Wellbeing	Discounted Gym Membership	Data Controller	United Kingdom
Parkrun Limited	Parkrun events	Data Controller	United Kingdom
Peloton Interactive UK Limited	Digital Fitness app	Data Controller	United Kingdom
Runners Need Limited	Discounted trainers	Data Controller	United Kingdom
Virgin Active Limited	Discounted Gym Membership	Data Controller	United Kingdom

### Active Rewards:

Third Party:	Description:	Data Role:	Jurisdiction:
Amazon EU SARL UK Branch	Amazon Prime benefit	Data Controller	United Kingdom, Ireland
Apple, inc	Apple Watch benefit	Data Controller	Ireland, USA
Etika Finance UK Ltd	Apple Watch financing	Data Controller	United Kingdom
Italian Coffee Holdings Limited	Free Caffè Nero drink and discounted food	Data Controller	United Kingdom
Rakuten TV	Free Films vouchers	Data Processor	United Kingdom, Japan, and USA
Vue Entertainment Limited	Free cinema tickets	Data Controller	United Kingdom

### Healthy Foods:

Third Party:	Description:	Data Role:	Jurisdiction:
John Lewis PLC - Waitrose Limited - Vitality Partner	Healthy eating discount	Data Controller	United Kingdom
WW GBR Limited	Weight loss programme	Data Controller	United Kingdom

### Travel:

Third Party:	Description:	Data Role:	Jurisdiction:
Champneys	Discount spa breaks	Data Controller	United Kingdom
Expedia Inc. - Expedia.co.uk	Discounted travel	Data Controller	USA
Smith Global Limited	Discounted luxury holidays	Data Controller	United Kingdom
Virgin Atlantic Limited	Discounted flights	Data Controller	United Kingdom

### Co-Branded Partners

Third Party:	Description:	Data Role:	Jurisdiction:
American Express Services Europe Limited	Cashback rewards	Data Controller	United Kingdom
Covea Insurance	Car Insurance	Data Controller	United Kingdom

### Health checks

Third Party:	Description:	Data Role:	Jurisdiction:
Allen Carr's Easyway (International) Ltd	Smoke cessation	Data Controller	United Kingdom
Bluecrest Health Screening Ltd	Health screening	Data Controller	United Kingdom
Digital Therapeutics Ltd – Quit Genius	Smoke cessation	Data Controller	United Kingdom
Lloyd Pharmacy Ltd	Health screening	Data Controller	United Kingdom
Nuffield Health	Health screening	Data Controller	United Kingdom

### Mental Wellbeing

Third Party:	Description:	Data Role:	Jurisdiction:
Headspace, Inc.	Mindfulness App	Data Controller	USA