

[REDACTED]

From: [REDACTED]
Sent: 07 September 2018 10:33
To: CentralGovernment
Subject: Updating 2011 Data Sharing Code of Practice

Suggested amendments/inclusions to the existing 2011 guidance:-

Page 6. Include as an example – service providers such as insurers/financial advisers/solicitors/investment companies & platforms providing client details to obtain required service/quotations.
Page 16. Sensitive Data – include guidance on sharing client health data required to obtain quotations for and protection/pension/annuity plans.
Page 17. Perhaps clarify whether service providers such as insurers/financial advisers/solicitors/investment companies & platforms, who share client data on a regular basis, both when obtaining required plans/quotations and when conducting ongoing review/renewal of existing plans on behalf of their clients, can still ensure they comply with good practice by acknowledging the need for these multiple counts of data sharing in their general privacy notice, rather than (as currently suggested) via separate information each time any of these are carried out, **PROVIDED** the service provider maintains regular (at least annual), reviews with their client to discuss and agree the client requirements. (Surely in the interests of both client/service provider/general common sense to avoid unnecessary and/or excessive contact/documentation)

Kind regards
Anne

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