# **Special Categories of Sensitive Personal Data**

I give explicit consent for you, Crystal Life Ltd, The On-Line Partnership Limited and On-Line Partnership Group Limited to process special categories of sensitive personal data\* relating to me.

Client Name	
Client Address	

I understand that you may pass this information on to a named product provider or contracted specialist provider, such as a paraplanning service, during the product application process. My sensitive personal data will be handled only by staff necessarily involved in these processes and at all times my sensitive personal data will be kept secure and confidential. Once my data has been passed to a named product provider, they will provide me with a privacy notice in respect of the processing they will carry out as a data controller in their own right. My data will be retained in line with the FCA's record keeping requirements.

I understand that my consent may be withdrawn at any time as outlined in the privacy notice.

Purpose	Type of data processed	Signature	Date
To enable the provision of professional opinions and high quality recommendations, ensuring advice is suitable and meets compliance standards set by the Financial Conduct Authority (FCA) with the aim to recommend an application(s) for the specified product or products listed below:	*Add categories as required:	* Add signature for each category:	* Add date for each category:
e.g., Life policy Life policy	Health data Ethnic origin	Mrs. Anonymous Mrs. Anonymous	28.04.2025 28.04.2025

[Add as purposes where you are relying only on explicit consent to process sensitive data.]

- \* Special categories of sensitive personal data refers to:
  - Personal data revealing racial or ethnic origin,
  - Personal data revealing political opinions
  - Personal data revealing religious or philosophical beliefs
  - Personal data revealing trade union membership.
  - Processing genetic data and biometric data for the purpose of uniquely identifying a living individual.
  - Personal data concerning health,
  - Personal data revealing sex life or sexual orientation.
  - Personal data relating to criminal convictions and offences.

### **NOTES FOR THE ADVISER**

Please print the template text on your own headed paper.

You must state all the reasons for processing and allow the data subject to indicate their <u>separate</u> consent for each processing activity.

You must list which special categories of sensitive personal data will be processed under each purpose.

You must also provide any relevant information the data subject should be made aware of.

It is expected that you will not be collecting any special categories of sensitive personal data other than those listed below:

- · Personal data concerning health,
- Personal data concerning sex life or sexual orientation,
- Personal data relating to criminal convictions and offences,
- Personal data revealing racial or ethnic origin.

### **Action Required**

If you are collecting other special categories of sensitive personal data, you should first inform the Compliance Team.

# **Special Categories of Sensitive Personal Data**

This Annex is intended to provide further clarity to firms when requesting special categories of sensitive personal data from clients. Firms first need to identify the reasons for obtaining / processing the data and list any sensitive data to be collected.

Firms should also consider processing activities for prospective clients and obtain consent for each purpose.

#### Mortgage / Equity Release enquiry / Recommendation:

Firms should think the process through and determine what sensitive data they will require from clients, most probably:

- 1. Personal data concerning health,
- 2. Personal data relating to criminal convictions and offences.

## **Protection / Insurance enquiry / Recommendation**:

Firms should think the process through and determine what sensitive data they will require from clients, most probably:

- 1. Personal data concerning health,
- 2. Personal data concerning sex life or sexual orientation,
- 3. Personal data revealing racial or ethnic origin, i.e., some ethnic backgrounds are statistically more prone to certain diseases.

### > Investment enquiry / recommendation:

Firms should think the process through and determine what sensitive data they will require from clients, most probably:

- 1. Personal data concerning health,
- 2. Personal data revealing racial or ethnic origin, i.e., some ethnic backgrounds are statistically more prone to certain diseases.

**FINAL NOTE**: The scenarios above are not exhaustive and it would be up to advisers to proactively think ahead when requesting special categories of sensitive personal data from clients.