

PRIVACY NOTICE for the International Personal Finance plc Pension Scheme (the “Pension Scheme”)

IPF Pension Trustee Limited, Registered address: 3 Leeds City Office Park, Meadow Lane, Leeds, LS11 5BD, Company Number 06446484, is your data controller. This means we are responsible for deciding how we hold and use personal information about you. We will process your personal data in connection with carrying out activities in connection with the administration of the Pension Scheme. We are committed to the highest standards of ethical business conduct. We strive to achieve our business goals, whilst ensuring we do that in a responsible and lawful way. This Privacy Notice describes the way we process your personal data, and also provides you with the information on your rights as a data subject as stated in the General Data Protection Regulation (GDPR) and any applicable national laws, including the UK GDPR¹.

Data Protection Principles

Whilst processing your personal data we will comply with the data protection principles, which are your personal data will be:

1. processed lawfully, fairly and transparently;
2. collected only for a valid purpose which we have clearly explained to you and not used in any way which is incompatible with that purpose;
3. relevant to the purpose we have told you about and limited only to that purpose;
4. accurate and kept up to date;
5. kept for no longer than is necessary for the purpose we have told you about; and
6. kept securely.

This Privacy Notice provides you with transparent information about the personal data that we collect and how we use it, your rights as a data subject and about the way you can exercise your data subject rights.

Our contact details

You can contact us with any privacy related issues using the following contact details for our data protection officer (DPO):

e-mail: gdpo@ipfin.co.uk

or by post at the company address above.

Personal data

Personal information means any information which identifies you or could be used to identify you. We make sure that we only process your personal data which is strictly needed for the purpose of the administration of the Pension Scheme.

We might process the following categories of your personal data:

Identification data – name, surname, address, national insurance number, bank account etc.

Contact data – email, telephone number, address, etc.

Data about professional life – employer, experience, position, salary, etc.

Data about family members - name of your spouse, children, etc.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018) and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019.

In case you have provided us with personal data related to your family members or other potential beneficiaries under your pension scheme, please inform these individuals about this Privacy Notice.

How do we collect your data?

We collect your personal data directly from you.

How long do we keep your data?

When we process your data for the purpose of administration of the Pension Scheme we keep your data for the life of the Pension Scheme and for the period necessary to deal with any complaints and claims that we receive in connection with your participation in the Pension Scheme but usually not longer than 7 years after your participation in the Scheme is terminated.

For the purpose of the fulfilment of legal obligations, we process your data required by the relevant laws and regulations for the period provided by the relevant law.

How do we protect your data?

In order to make sure that your rights and freedoms are not put at risk and that compliance with relevant laws and regulations in the field of data protection is observed, we have implemented appropriate technical and organisational measures to ensure a sufficient level of security to the personal data processing.

To whom do we disclose your data?

Depending on the purpose of processing, we may disclose your personal data to different categories of recipients, namely:

- the third-party Pension Scheme administrator;
- the Pension Scheme actuary;
- AVC providers;
- our contractual partners and external suppliers;
- we are also in some cases legally obligated to disclose data to public authorities or regulators (e.g. The Pensions Regulator, tax authorities), but only to comply with a defined legal obligation.

We only disclose your data to the extent necessary and in a form that is required to achieve a given purpose. We ensure that conditions to enforce your rights and effective legal remedies are available. Any potential external supplier is subject to an internally conducted security pre-assessment, and mutual rights and obligations are carefully addressed in a Data Processing Agreement entered into with that supplier.

We may use external suppliers in the processing of data to either optimise our internal processes and/or conduct some of the processing on our behalf (typically to provide support and maintenance services). We process your personal data within the European Economic Area, and also in other countries (namely US, United Kingdom and India).

For any occasion in which our suppliers process your personal data in countries which do not provide sufficient level of protection to your rights, we carefully assess the relevant circumstances and make sure appropriate safeguards are put in place so that your rights are not undermined. All of our suppliers who process your data in a third country which is not a recipient of an adequacy decision under the applicable GDPR regime are required to sign our Model contractual clauses² and we regularly check the level of security provided to personal data processed on our behalf.

² Commission Decision 2004/915/EC, dated 27 December 2004 – in which the Commission approved an alternative set of model clauses for transfers from data controllers in the EEA to data controllers outside the EEA.

Commission Decision 2010/87/EU, dated 5th February 2010 – in which the Commission approved a new set of model clauses for transfers from data controllers in the EEA to data processors outside the EEA to replace the Set I controller to processor clauses.

How do we process your data?

We process your personal data by collecting, storing and organising it in our systems. We will compare and alter data to ensure it is accurate and kept up to date. When appropriate your data is destroyed/deleted.

How do we use your data and on what legal basis?

Below we describe the legal basis for processing of your data and different purposes of processing:

- **To comply with our legal obligations**
We have to satisfy our legal obligations as the Trustee of the Pension Scheme. To comply with these legal obligations, we may disclose your data to our financial consultants, auditors and other service providers, provided always that they ensure the confidentiality of your personal data.
- **Based on our legitimate interests**
We may process your personal data for our legitimate interest in administering and managing the Pension Scheme. In order to do so we would typically need to process your personal data to communicate with you and conduct relevant operations in the best interest of the Pension Scheme and you.

To make sure our interests are balanced against your interests.

Based on our legitimate interest we might process your identification data, contact data, data about professional life, data about family members and digital data. When we process your data based on our legitimate interest, we keep your data no longer than is necessary to reach the purpose. If your data is no longer required for the lawful purposes for which it was obtained, it will be destroyed subject to any conflicting laws or data protection considerations (for your information, some of the factors which will affect how long we retain your data include your continued participation in the Pension Scheme).

If you are located outside of the EEA:

- the processing of your data may be governed by local national and/or other international laws, as well as the GDPR; and
- to comply with our obligations stemming from the data protection laws in connection with your participation in the Pension Scheme, your personal data will be processed in accordance with this Privacy Notice.

Your rights

You have numerous rights under the existing legislation. These are not absolute rights and there are exceptions. However,

- You have a **right to be informed about the data we collect and how we use your data**.
- You have the right **to access** your personal data, including the right to obtain a copy of your personal data we process.
- In some circumstances you have a **right to portability** of your data.
- You have a right for **your personal data to be kept up to date**, if you find any data we have about you is incorrect, you can request rectification of inaccurate data and you can have incomplete data completed or additional data provided via contacts defined above. You can ask for restriction of your data processing if the accuracy of your personal data is contested for a period allowing us to verify the accuracy.
- You have a **right to restrict processing**. That means we will store your data, but not use it for anything else. You also have a right to request **erasure of your personal data**. You can exercise both rights on conditions specified by law. If you have obtained restriction of processing, you will be informed before the restriction of processing is lifted.
- You have a **right to contact us** at any time, if you believe your rights under data protection law have been violated.

Automated decision making

We do not make any automated decisions about you.

Keeping your information up to date

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes.

Your right to object to your data processing based on legitimate interest

Wherever we rely on our legitimate interest to use your personal data, we have taken into account and acknowledged your interests and rights under data protection law. Your privacy rights are always protected by sufficient safeguards and balanced with your rights and freedoms. You have the right to object to your personal data processing based on our legitimate interest.

If you wish to submit an objection against your personal data processing based on our legitimate interest or to exercise any of the rights referred to above, use the contact details provided at the beginning of this Notice.

Please note that we can continue processing if we find our legitimate interest is balanced with your rights and freedoms. If your objection is sustained, it may stop us from processing your personal data for a given purpose.

Your right to turn to the Data Protection Authority or a competent court

You have a right to turn to the competent supervisory Data Protection Authority - in the UK this is the Information Commissioner's Office, via helpline on 0303 123 1113 or electronically via live chat <https://ico.org.uk/global/contact-us/live-chat/live-chat-individuals/> or via <https://ico.org.uk/global/contact-us/email/> or in writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or a competent court or tribunal if you believe your rights with regards to the personal data processing have been violated. In the European Economic Area you should contact your local data protection regulator.

Updates

We keep our privacy notice under review and may change it from time to time (mostly to comply with the law and data protection practices). Updated versions will be shared with you and also published on our webpage. This notice was last updated in January 2021.