

# Customer Privacy Notice



Annuity<sup>help</sup> Direct

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# Customer Privacy Notice

We want you to be confident that your data is safe and secure with us. This Customer Privacy Notice explains why we collect your personal data, the type of personal data we collect, and how we use it when providing our services to you. It also explains the rights and choices you have when it comes to your personal data.



By providing your personal data you acknowledge that we will only use it in accordance with this Customer Privacy Notice.

For the purposes of the General Data Protection Regulation 2018 Pensionhelp Limited act as Data Controller and Data Processor of any personal data which you may provide to us or which we may collect from third parties about you and/or which we may collect when you access our website. It is the responsibility of Data Controllers to explain their data processing activities to affected individuals. This Statement provides information regarding our data processing activities, as both controller and processor.

It is important that you read this statement together with any other privacy notice we may provide on occasions, so you are aware of why and how we are using your personal data.

This Customer Privacy Notice applies to all our clients and a prospective client. It applies regardless of whether you are a former client or a current client.

This Customer Privacy Notice applies to our website, external communications platforms as well as to our internal processes. It applies to all personal data provided in person by telephone, email, through the website, social media and by post.

It applies to any data collected from third parties which has been sent to us in our normal day to day operations.

By using our website or accessing any services which we offer including for example, by requesting an online quotation, making an enquiry about our products and service, you agree to be bound by the Customer Privacy Notice in respect of the information collected about you.

## Why should you read this document?

During the course of dealing with us, we will ask you to provide us with detailed personal information relating to your existing circumstances, your financial situation and, in some cases, your health and family health history (Your Personal Data). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

## What do we mean by “Your Personal Data”?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, National Insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your retirement planning and Investment requirements Your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity.
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other benefits), employment history.
- Bank account details, tax information, loans and credit commitments, personal credit history, sources of income and expenditure, family circumstances and details of dependents.
- Health status and history, details of treatment and prognosis, medical reports (further details are provided below specifically with regard to the processing we may undertake in relation to this type of information).
- Any pre-existing investment, mortgage, finance, pension and insurance products and the terms and conditions relating to these.

## The basis upon which our Firm will use Your Personal Data

To perform a contract we have entered into with you, or to take steps at your request before entering into a contract.

When we speak with you about your financial requirements we do so on the basis that both parties are entering a contract for the supply of services, or taking steps at your request before entering into the contract.

In order to perform that contract, and to arrange the products you require, we have the right to use Your Personal Data for the purposes detailed below.

Where it is necessary for our legitimate interests (or those of a third party) provided your interest and fundamental rights do not override those interests.

In the course of initial discussions with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to:

- Respond to requests from pension product providers, insurance providers.
- Exercise or defend our legal rights, in the event of any legal claim or to pursue legal claims.
- Respond to complaints.
- Provide management information to enable us to monitor our performance and understand our business.
- To maintain our records and to manage our financial position and business capability.
- For improvement of our services and for training purposes.
- For accounting, auditing purposes and corporate governance purposes and the prevention of fraud.

## To comply with a legal obligation

On occasion, we will use Your Personal data for fulfilment of our responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

## The basis upon which we will process certain parts of Your Personal Data

Where you ask us to assist you with for example your insurance or ethical investments, in particular life insurance and insurance that may assist you in the event of an accident or illness, we will ask you information about your ethnic origin, your health and medical history (Your Special Data). We will record and use Your Special Data in order to make enquiries of Pension, Investment and Insurance providers in relation to insurance products that may meet your needs and to provide you with advice or guidance regarding the suitability of any product that may be available to you.

If you have parental responsibility for children under the age of 13, it is also very likely that we will record information on our systems that relates to those children and potentially, to their Special Data.

Where applicable we also collect information about your dependants, spouse, beneficiaries or next of kin. Before providing us with this information, you should provide a copy of the information in this notice to those individuals and have their agreement for the information to be shared with us.

The arrangement of certain types of insurance may involve disclosure by you to us of information relating to historic or current criminal convictions or offences (together "Criminal Disclosures"). This is relevant to insurance related activities such as

underwriting, claims and fraud management.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Customer Privacy Notice.

Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

## How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will usually provide information when you request any products or services and fill in any forms or applications. You will provide information to us verbally and in writing, including email and via our website and by any other means. During the course of obtaining quotations, through our initial conversations or meetings with you to establish your circumstances and needs and preferences in relation to investment, mortgages, finances, pension and insurance

From individuals and, or firms acting on your or our behalf (for example, powers of attorney and platform providers)

Credit reference agencies and identity verification providers, Companies House and the electoral roll.

## What happens to Your Personal Data when it is disclosed to us?

In the course of handling Your Personal Data, we will:

- Record and store your Personal Data in our paper files, mobile devices and on our computer systems (websites, telephones, email, hard drives, desktop & cloud facilities). This information can only be accessed by our service providers (back office, software suppliers, IT & hosted services) including their sub-contractors and by employees and consultants within our Firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Pension Product providers, Insurance Product providers, trusted partners (for example annuity comparison providers such as AMS Retirement run by Retirement Systems Limited) and our regulator both in paper form and on-line via a secure portal. Except in the case of our regulator, the provision of this information to a third party is essential in allowing us to progress any enquiry or application made on your behalf and to deal with any additional questions or administrative issues that providers may raise.
- Use your Personal Data for the purposes of responding to any queries you may have in relation to any pension, investment or insurance policy you may take out, or to inform you of any developments in relation to those products or policies of which we might become aware.

## Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Pension providers, investment providers, trusted partners (for example annuity comparison providers such as AMS Retirement run by Retirement Systems Limited), insurance providers, if applicable, your financial adviser from the firm that introduced you to us and our regulator.
- Third parties who we believe will be able to assist us with your enquiry or application and we deal with as part of the operation of our services, including (but not limited to), IT, back office administration providers, credit reference agencies for identity verification, anti-fraud and anti-money laundering checks, professional advisers, administrative service providers, printers and scanners, debt collection agencies, or those who are able to support your needs as identified. (in each case where we believe this to be required due to your particular circumstances).

In each case, your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice, i.e. to progress your retirement planning, investment or insurance enquiry and to provide you with our professional services or to provide information to our regulator.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

Your personal data may be transferred to or accessed from other countries (including those outside the European Economic Area). Such information could be accessed by local law enforcement agencies and other authorities to prevent and detect crime and comply with legal obligations. For further details, as to where your personal information is transferred, please contact the Data Controller.

## Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper format for a minimum of six years, or in instances whereby we have a legal right to such information we will retain records indefinitely.

## Your rights in relation to Your Personal Data

### You can:

- request copies of Your Personal Data that is under our control
- ask us to further explain how we use Your Personal Data
- ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

## How to make contact with our Firm in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

The Data Controller  
Pensionhelp Limited,  
8 St John Street,  
Manchester,  
M3 4DU

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the Information Commissioner's Office (ICO), who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## Company Information

We are Pensionhelp Limited. We are registered in England and Wales under company number 09437056 and have our registered office at 8 St John Street, Manchester, M3 4DU. Authorised and Regulated by the Financial Conduct Authority (Firm Reference Number: 754665)

## Cookies

To find out more about how we use cookies please see our cookie policy.



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