



PRIVACY INFORMATION NOTICE



Introduction

Safeguarding our customers' personal information is of great importance to us.

The purpose of this Privacy Notice is to provide you with an understanding of how we collect, process and keep secure your personal information, as well as to inform you of the privacy rights available to you.

About Us

Both @sipp Limited, as data controller, and @sipp (Pension Trustees) Limited, as data processor, are registered with the Information Commissioner's Office for handling and processing data.

Personal information collected by @sipp Limited may be shared with @sipp (Pension Trustees) Limited, but we will both comply with all relevant data protection regulations.

Throughout this Privacy Information Notice, references to "we", "us" or "our" refer to @sipp Limited in its capacity as data controller.

Why we need to collect and process your personal information

The personal information we collect is necessary for proper performance of our obligations to you, i.e. to allow us to set up, administer, and send you information about, your SIPP.

We will also use your personal information where we need to comply with a legal obligation or where it is necessary for some other legitimate purpose, e.g. to ensure good and proper governance.

By signing our SIPP application form you are giving your consent for us to process your personal information for these purposes.

The type of personal information we collect and process

The personal information we collect will include:

- Contact information, e.g. your name, address, email address and telephone number(s)
- National identifier information, e.g. your National Insurance number
- Demographic information, e.g. your gender, age, nationality and profession
- Financial information, e.g. your bank account details and tax status
- Relationship information, e.g. marital status and details of any dependents
- Communications, e.g. information about you from letters, emails and conversations.

In the rare and unfortunate event of paying an ill-health pension, we will also need to make enquiries about your state of health, to support the payment of the pension in these circumstances. This is a legal requirement on us, however we will not obtain this information without your prior consent.

How we collect your personal information

We collect your personal information from our forms that you complete or through your correspondence with us.

We may also receive your personal information via a third party, e.g. your financial adviser, investment manager or other registered pension scheme provider, where it is necessary for the proper performance of our obligations under our contract with you.

Who we might disclose your personal information to

We will not disclose your personal information to anyone other than the trustee unless:

- We have your permission, or
- It is to any person we reasonably believe to have been appointed by you as your agent, investment manager or professional adviser, or
- We are required or permitted to do so by law or any competent authority, or
- We are transferring your personal information to our third party service providers, credit reference agencies and fraud prevention agencies, or
- We are transferring your personal information to any third party in connection with the investment of your plan, or
- We are transferring your personal information to any third party in connection with the performance of our obligations in relation to your plan or the scheme, or
- We have transferred our rights and obligations in relation to your plan.

Where we send data outside of the European Economic Area (“EEA”)

We may transfer your information to countries outside of the EEA but this will only be done if the receiving country has an appropriate level of data protection. This information may be accessed by law enforcement agencies and other authorities in that country to prevent and detect crime.

Retention of your personal information

We will only retain your personal information for as long as necessary for proper performance of our obligations to you and to meet legal and regulatory requirements. This may mean we retain your personal information after the end of your contract with us, where your application is declined or where you decide not to proceed with your application.

Our records are reviewed regularly to ensure that personal information is not retained for longer than is necessary.

Keeping your personal information safe

We have the appropriate security measures in place to keep your personal information secure and preventing it from being accessed or disclosed in an unauthorised way.

Where it's necessary to provide your personal information to a third party we'll use appropriate security measures to protect your data.

Your right of access

You can request a copy of the personal information we hold about you, free of charge. You can make a request for information verbally or in writing.

The information will typically be provided at the latest within one month of receipt of the request. But where requests are complex or numerous it may take longer. In such cases, we will inform you should an extended timeframe apply.

We may charge a reasonable administration charge if we are asked to provide further copies of the same information.

Your right to rectification

You can request to have inaccurate personal information we hold rectified or completed if it is incomplete, free of charge. You can make a request for rectification verbally or in writing.

We will need to verify the accuracy of the new information you provided us. We will act upon a rectification request at the latest within one month of receipt of the request. But where requests are complex or numerous it may take longer. In such cases, we will inform you should an extended timeframe apply.

Your right to erasure

You can request to have personal information we hold about you erased, free of charge, where there is no lawful basis for us continuing to process it. You can make a request for erasure verbally or in writing.

We will act upon an erasure request at the latest within one month of receipt of the request. But where requests are complex or numerous it may take longer. In such cases, we will inform you should an extended timeframe apply.

Your right to restrict processing

You can request to have personal information we hold about you restricted or suppressed, free of charge, in the following circumstances:

- You contest the accuracy of the personal information we hold, or
- Your personal information has been processed unlawfully and you oppose its erasure, or
- We no longer need the personal information but you need to keep it in order to establish, exercise or defend a legal claim, or
- You have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use it.

You can make a request to restrict or suppress processing verbally or in writing.

We will act upon a restrict or suppress processing request at the latest within one month of receipt of the request. But where requests are complex or numerous it may take longer. In such cases, we will inform you should an extended timeframe apply.

Your right to data portability

You can request to receive a copy of the personal information we hold about you, which has been provided by you, in a machine readable format. You can also request that we transfer this personal information to another data controller in the same manner. You can make a request to restrict processing verbally or in writing.

We will act upon a data portability request at the latest within one month of receipt of the request. But where requests are complex or numerous it may take longer. In such cases, we will inform you should an extended timeframe apply.

Your right to object

You can request to stop the personal information we hold about you from being processed, free of charge, where there is no lawful basis for us continuing to process it. You can make a request to stop processing verbally or in writing.

We will act upon a request to object request at the latest within one month of receipt of the request. But where requests are complex or numerous it may take longer. In such cases, we will inform you should an extended timeframe apply.

Further information

Contact Us

If you would like to exercise any of the above rights please write, email or call using the details below:

Data Protection Team
@sipp Limited
6th Floor, Mercantile Building
53 Bothwell Street
Glasgow
G2 6TS
E dpteam@atsipp.co.uk
T 0141 204 7950

The Information Commissioner's Office (ICO)

The ICO is the UK's independent body set up to uphold information rights. Further information can be found on their website at www.ico.org.uk or you can write to, email or call them using the details below:

Information Commissioner's Office
45 Melville Street
Edinburgh
EH3 7HL
E scotland@ico.org.uk
T 0303 123 1115



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@sipp Limited is registered in Scotland (Registered No. SC217126) and has its registered office at 6th Floor, Mercantile Building, 53 Bothwell Street, Glasgow, G2 6TS and is authorised and regulated by the Financial Conduct Authority under Firm Reference No. 462907 and you can check this authorisation at www.fca.org.uk or by calling the FCA on 0800 111 6768.