



## Privacy policy

This policy (together with any other documents referred to in it) explains how we collect, process and protect personal data about you.

This policy includes:

- Details of the types of personal data we may collect and store
- The legal basis for using your personal data
- How we capture and receive this personal data
- How we use your personal data
- How we may disclose your personal data and share this with third parties
- Where we store and protect your personal data and how long we will hold it for
- Your legal rights in relation to your personal data we hold
- How you can contact us for more information

For the purpose of the Data Protection Bill, the General Data Protection Regulation (GDPR) and other relevant legislation, our data controller is AJ Bell Management Limited of 4 Exchange Quay, Salford Quays, Manchester M5 3EE.

The Data Protection Officer for AJ Bell Management Limited is Louis Petherick, Chief Risk Officer, who can be contacted at the address shown above or by email at [hdsipp@sippdeal.co.uk](mailto:hdsipp@sippdeal.co.uk)

The table below confirms the personal information we collect from you, along with why we collect your data and the legal basis for doing so:

Type of data	Data collected	Purpose of processing	Legal basis
Residential and contact information	Including details of your: <ul style="list-style-type: none"><li>• Address</li><li>• Email address</li><li>• Telephone number</li><li>• Place of work</li><li>• Any other contact details</li><li>• Nationality and citizenship</li></ul>	Verifying your identity Contacting you about products, services, regulatory obligations, and contractual obligations Seeking your consent for transactions and changes to terms and conditions	In order to fulfil our contractual obligations to contact you and update you on product changes, and in order to comply with regulatory requirements
Socio-demographic	Including details of your: <ul style="list-style-type: none"><li>• Age</li><li>• Gender</li><li>• Profession or employment</li><li>• Earnings</li><li>• Other details of the source of your wealth</li></ul>	Developing products and services Defining customer types and target markets Complying with regulatory requirements and managing risk effectively	In order to fulfil our contractual obligations and in order to comply with regulatory requirements

Family circumstances	Including details of your: <ul style="list-style-type: none"> <li>• Marital circumstances</li> <li>• The names of members of your family and their relation to you</li> </ul>	Understanding your circumstances Paying benefits appropriately from your account/s	In order to fulfil our contractual obligations and in order to comply with regulatory and legislative requirements
Transactional information	Including details of: <ul style="list-style-type: none"> <li>• Payments to and from your accounts</li> <li>• Transactions instructed on your account by you</li> <li>• Enquiries in relation to your account and proposed or completed transactions</li> </ul>	Efficiently completing transactions you instruct, or that we must undertake for legal or regulatory reasons.	In order to fulfil our contractual obligations and in order to comply with regulatory requirements
Special and one-off items of information	Including details of your: <ul style="list-style-type: none"> <li>• Health and illnesses</li> <li>• Disabilities and special requirements</li> <li>• Personal financial status (e.g. in relation to bankruptcy or insolvency)</li> </ul>	Paying benefits appropriately from your account/s	In order to fulfil our contractual obligations and in order to comply with regulatory requirements
Legal	Including: <ul style="list-style-type: none"> <li>• Documents relating to your identity, residency, nationality and citizenship</li> <li>• National identifiers, passport number and tax authority identifiers</li> <li>• Your birth certificate, passport, marriage certificate, driver's license and proof of addresses</li> </ul>	Verifying your identity, authority and eligibility in relation to the products and services we provide to you.	In order to fulfil our contractual obligations and in order to comply with regulatory requirements

### The legal basis for using your personal information

We'll only collect, use and share your personal information where we're satisfied that we have an appropriate legal basis to do so. This may be because:

- our use of your personal information is in our legitimate interest as a commercial organisation – so we can verify your identity, or communicate with you about the products and services that you use or may wish to use. In these cases, we'll look after your information at all times in a way that is proportionate and respects your privacy rights. You have a right to object to processing, as explained below

- our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you – for example, on opening an account for you or instructing an investment
- our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have, for example providing information on investment transactions to the FCA and reporting holdings, payments, accruals, and charges to the relevant tax authorities

If you would like to find out more about the legal basis for which we process personal information, please contact us.

### Information you give us

You may give us information by filling in forms or by corresponding with us by phone, email or otherwise. The information you give us may include your name, address, email address, phone number, financial information and/or other relevant personal details.

By submitting such details, you confirm that you are entitled to disclose information about, or provided by, any third party.

### Information we receive from other sources

If you authorise a third party to contact us on your behalf which entitles them to provide us with, and receive, information about you or the services you have with us, we'll always verify their identity and right to access your information before any information about your account(s) is provided.

### Disclosure of your information

We may share your personal information with any member of our group. This includes our subsidiaries and our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We share information amongst our subsidiaries to ensure that each business unit which provides platform and pension administration services has the information it needs to efficiently and effectively process transactions and other administrative duties on your behalf. It also means they comply with regulatory requirements and reporting obligations.

We may share your information with selected third parties, including:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, including but not limited to:
  - Investment providers regulated and authorised to provide investment services in the United Kingdom
  - Data and software providers
  - Regulatory and tax authorities
  - Credit reference and fraud prevention agencies

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of the business or assets
- if AJ Bell Management Limited or substantially all of its assets are acquired by a third party, in which case the personal data we hold about our customers will be one of the transferred assets
- if we're required to disclose or share your personal data in order to comply with a legal obligation, or to enforce or apply our rights under this policy or terms and conditions and other agreements; or to protect the rights, property, or safety of any member of our group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

### How we store and protect your personal data

Your data will primarily be held in the UK but there may be occasions when the data that we collect from you is transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We'll take all steps that are reasonably necessary to ensure your data is treated securely and in accordance with this privacy policy.

### How long we will store your personal data for

Your data will be stored for the duration of your relationship with us. After the relationship ends, we will store your data only for as long as it's appropriate and necessary to do so.

### Your rights

You have the following rights when it comes to your data that we hold:

#### **The right to access**

You have a right to request that we provide you with a copy of the personal information on you that we hold. You also have the right to be informed of (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities your personal information may be transferred to.

#### **The right to rectification**

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

## **The right to erasure**

In limited circumstances, you can request that we erase your personal information if:

- it's no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which you are subject.

We aren't required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

## **The right to restriction of processing**

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you don't want it erased; or
- it's no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

## **The right to object to processing**

You can object to any processing of your personal information which has our legitimate interests as its legal basis – providing you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we'll need to demonstrate that we have compelling legitimate interests which override your rights and freedoms in order to continue processing your data.

## **The right to portability**

You have the right to ask us to provide you with an electronic file containing all personal information we hold about you. You can give this information to other organisations if you wish to.

## **Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction**

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

## **Right to lodge a complaint with your local supervisory authority**

If you have concerns about how we're processing your personal information, you have a right to lodge a complaint with your local supervisory authority.

We ask that you please attempt to resolve any issues with us first – although you have a right to contact your supervisory authority at any time.

## **Access to information**

Before sending you a copy of the personal information you requested, we may ask you for additional information to confirm your identity and for security purposes. We reserve the right to charge a fee where permitted by law – for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we'll make every reasonable effort to honour your request promptly, or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example if it goes against the duty of confidentiality we owe to others, or if we're legally entitled to deal with the request in a different way.

## **Changes to our privacy policy**

Please note that updates to this policy are not emailed as a matter of course, so please check back frequently to see any updates or changes to our privacy policy.

## **Contact**

Please send any questions or comments about this policy to Customer Services, AJ Bell, 4 Exchange Quay, Salford Quays, Manchester M5 3EE, or email us at [hsdlsipp@sippdeal.co.uk](mailto:hsdlsipp@sippdeal.co.uk).