



1 INTRODUCTION

During the course of your relationship with I.P.M. SIPP Administration Limited* ("IPM") it will be necessary for us to obtain personal data about you and process this data.

**In this notice all references to us/we/our/the firm/the company mean I.P.M. SIPP Administration Limited*

What is Personal Data?

The definition of personal data has two elements:

- (1) It is any information which can be used to identify or locate you;
- (2) It is any information about you which is of a private or confidential nature.

What does 'Processing' mean?

In the context of personal data, processing means doing anything with or to that data.

This includes collecting it, storing it, accessing it, using it, sharing it and deleting it.

Data Controller

A data controller is the party responsible for determining why and how personal data is processed.

In our relationship with you, IPM is the data controller.

Data Processor

A data processor is a party which processes data on behalf of the data controller.

There are a number of external parties who act as data processors for IPM – for further information please see the **Recipients of Personal Data** section below.

Categories of Personal Data

The type of personal data which IPM processes can be categorised as follows:

- **Identity Data** – this includes your name, national insurance number, passport/driving licence number, date of birth, gender
- **Contact/Communication Data** – this includes your home address, telephone number, email address
- **Financial Data** – this includes personal bank account details, earnings, financial status, details of personal financial/investment interests
- **Private/Confidential Data** – including marital status, employment information, details of family and/or business relationships

Data Protection Officer

The Data Protection Officer (DPO) is responsible for overseeing data protection strategy and implementation. The role of DPO also involves them acting as a contact point for data subjects (the individual to whom personal data relates) and the supervisory authority.

The DPO for IPM is David Sutcliffe, who is also the Managing Director of the firm.

2 LEGAL GROUNDS AND PURPOSES FOR PROCESSING

IPM can only collect and process personal data when there is a lawful reason to do so.

The lawful reasons for which we will obtain and use personal information about you are as follows:

1. Processing is necessary for the performance of a contract

IPM is the trustee and administrator of the IPM Personal Pension Scheme. The scheme members are the clients of IPM, so we can only provide our services if we can identify and communicate with the scheme member.

2. Processing is necessary to comply with a legal obligation

It is our duty to act in accordance with the law at all times. Anti-money laundering regulations compel IPM to verify a scheme member's identity and carry out appropriate background checks. We are also bound by reporting requirements and other obligations set by HM Revenue & Customs, the Financial Conduct Authority and other agencies such as law enforcement.

3. Processing is necessary to protect your vital interests

IPM can only provide adequate protection to a member's arrangement within the pension scheme if there is sufficient personal data to verify the member's identity, understand and monitor financial transactions, issue accurate communications and so on

4. Processing is necessary to pursue the legitimate interests of IPM

If a scheme member complains or instigates legal proceedings against IPM then we are entitled to investigate the grievance in order to defend ourselves, which may require us to process the member's personal data. Similarly, IPM reserves the right to pursue a member for unpaid fees or other sums legitimately owed to us.

Please note that IPM will only ever process your personal data for the purposes mentioned above. Equally, we will not obtain more personal data than is necessary for us to achieve those purposes or personal data which is not relevant to them. We do not engage in practices such as targeted marketing or predictive customer analysis. Any processing which is not consistent with the reasons given here constitutes a data protection breach and is not lawful. If it is necessary for us to use your personal information for any other purpose then IPM is obliged by law to inform you and justify the legal basis for us processing the data in that way.

3 RECIPIENTS OF PERSONAL DATA

IPM will only share your personal data with a third party if it absolutely necessary to provide the services you have agreed with us, or if there is a legal obligation for us to do so. We will share your data with authorised parties, such as your designated financial advisor, and with solicitors, banks, investment houses and other financial institutions depending on what is required to execute your instructions. It is also necessary for IPM to verify your identity and the personal details you provide to us as a client of the firm, and in order to do that we will share your personal data with suppliers who provide services that allow us to carry out such checks.

As IPM records personal data electronically your personal data will be processed by our IT partner who is responsible for operating, overseeing and maintaining our IT systems and servers. It will also be necessary for us to share your personal data for external auditing purposes

With each data processor we have an agreement in place which sets out the services we have contracted them to provide and which also contains assurances that any personal data they process on our behalf is used in a way which is lawful and which aligns with the purposes for which the personal data was originally obtained by IPM..

If you make a complaint against IPM we may be required to share your personal data with the Financial Ombudsman Service, the Pensions Ombudsman and/or the Pensions Advisory Service.

It is our duty to ensure that your personal data is shared with data processors in a secure manner and the data is limited to what is necessary.

4 YOUR RIGHTS

In order for you to have full control over how your personal data is used, it is important that you are aware of your rights as a data subject under the law.

1. Right of access

You are able to request IPM for a copy of the personal data which we are processing and we must provide this to you within one calendar month of the date of the request.

2. Right of rectification

You have a right to have any inaccurate or incomplete data held by IPM be corrected or completed.

3. Right to erasure ('Right to be forgotten')

You can request IPM deletes your personal data when the purposes for which the data was collected in the first place no longer apply.

4. Right to restriction of processing

You can ask for your personal data to be stored but not otherwise processed by IPM without your express consent if the data is not being used for the purposes for which it was collected, if those purposes no longer apply, or if it was not collected in accordance with the legal grounds for processing mentioned above.

5. Right to object

Where IPM processes your personal data to further our legitimate aims, you have the right to object to your personal data being processed unless we can demonstrate compelling legitimate grounds for processing.

6. Right to data portability

You have a right to request IPM transfer personal data which we are processing to another data controller in electronic form.

5 RETENTION OF PERSONAL DATA

So long as you are a client of IPM, we will retain all the lawful personal data which we are allowed or obliged to process in order to provide our services, comply with our legal obligations, and so on.

IPM will also retain your personal data after you are no longer a client of the firm, until such a time when we determine that there is no longer any reasonable grounds for retaining the personal data. During this retention period the processing activity will be restricted so that the personal data can only be accessed in circumstances where there is a legitimate need to do so. This may be to assist with any enquiries from you or others with whom we are obliged to co-operate, such as law enforcement agencies, about your arrangement during your relationship with IPM. Furthermore, as you have the right to make a complaint against IPM even after you cease to be our client, we will only be able to investigate and respond if we are able to look at your file and the personal data therein which is relevant to the complaint.

Once there is no justifiable reason for your personal data being retained by IPM 'hard' paper copies and 'soft' electronic copies will be destroyed in a secure manner.

6 DATA PROTECTION SUPERVISORY AUTHORITY

The UK Supervisory Authority for data protection is the Information Commissioner's Office ("ICO"). You can visit their website at www.ico.org.uk

You have the right to lodge a complaint with ICO if you are unhappy with how IPM processes your personal data or have any concerns about our data protection practices in general.

7 CONTACT IPM

If you have any queries about any aspect of personal data and data protection, please contact IPM using any of the following details:

Address: IPM SIPP Administration Limited, Cambridge House, Unit B,
Campus Six, Caxton Way, Stevenage, Hertfordshire, SG1 2XD

Tel: 01438 747 151

Fax: 01438 357 344

Email: info@ipm-pensions.co.uk

A copy of our full Data Protection Policy is available upon request.



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I.P.M. SIPP Administration Limited is Authorised and Regulated by the Financial Conduct Authority