

Privacy

We are: Expert Pensions Advice Ltd, The Old Police Station, 58 East Main Street, Blackburn. West Lothian. Scotland. EH47 7QS

Our contact email address on privacy matters is: advice@expertpensions.com

This Privacy Policy is issued on behalf of the Expert Pensions Advice. As such, any references to “Expert Pensions Advice”, “we”, “us” or “our” in this Privacy Policy are references to the relevant company (as named above). Expert Pensions Advice is responsible for processing your data.

Our commitment

Expert Pensions Advice is committed to protecting your personal information and other data provided to Expert Pensions Advice via this website. If Expert Pensions Advice requests information from which you could be identified (“personal data”), information of this type will only be used in accordance with this.

Privacy Policy

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Expert Pensions Advice's products and services are not designed to appeal to or not available for persons under the age of 18. Therefore, Expert Pensions Advice does not knowingly attempt to solicit or receive any information from anyone under the age of 18.

Lawful basis of processing

Under data protection laws, Expert Pensions Advice must have legal bases in order to process your personal data. The legal bases on which Expert Pensions Advice may process your data are:

- Consent: where you have consented for us to process your personal data for one or more specific reasons
- Performance of a contract: in order to perform a contract we may have with you
- Legal obligation: where processing of the data is required by law.
- Legitimate interest: in order to carry on the purposes of Expert Pensions Advice's business of processing your personal data on the basis that we have a legitimate interest in preventing fraud and identity theft, and to verify identity, in order to protect our business and to comply with laws that apply to us; in order to understand how people interact with our website; to provide communication which we think will be of interest to you, to determine the effectiveness of promotional campaigns and advertising.

What information does Expert Pensions Advice collect and how does Expert Pensions Advice collect this information from you?

Expert Pensions Advice may need to collect information about you and your computer to allow you to use some services, including:

- Identity data: First name, maiden name, last name, email, marital status, title, date of birth and gender.
- Contact data: billing address, email address and telephone numbers.

- Financial data: bank account and payment card details.
- Transaction data: details about payments to and from you and other details of products and services you have purchased from us.
- Technical data: internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile data: your username and password, your interests, preferences, feedback and survey responses
- Usage data: information about how you use our website, products and services.
- Marketing and communications data: your preferences in receiving marketing from us and our third parties and your communication preferences.

The information may be collected:

- Directly when you register or log on to the website or when you choose to use an available Expert Pensions Advice service via the website, including when you fill out forms, transfer any policies into our agency, upload any documentation, send Expert Pensions Advice any communication by email, fax or post, make an enquiry, complete the Expert Pensions Advice risk profiling questionnaire or any other communication that Expert Pensions Advice receives directly or indirectly from you.
- As you browse the Expert Pensions Advice website, including information relating to your browsing patterns and technical data about the equipment you are using to access the website is automatically collected using cookies, server logs and other similar technologies.
- Automatically: as you browse the Expert Pensions Advice website certain information relating to your browsing patterns and technical data about the equipment you are using to access the website is automatically collected using cookies, server logs and other similar technologies.

What does Expert Pensions Advice do with this information?

Expert Pensions Advice may use your personal data for the following purposes:

- to provide the requested services to you;
- to monitor traffic patterns and usage of the website to help to improve the website design and layout;
- to record and store communications made via phone, Skype or the website chat function;
- in accordance with Expert Pensions Advice's legitimate interests (in circumstances where your interests and fundamental rights do not override Expert Pensions Advice's interests);
- to personalise your experience on the Expert Pensions Advice website or communications/advertising;
- to provide customer service, including to respond to your enquiries and fulfil any of your requests for information;
- to send you important information regarding the Expert Pensions Advice services and/or other technical notices, updates, security alerts, and support and administrative messages; and
- as Expert Pensions Advice believes to be necessary or appropriate:
 - in order to comply with a legal obligation. This applies where the processing is necessary for Expert Pensions Advice to comply with the law;
 - to enforce or apply this Privacy Policy; and
 - to protect Expert Pensions Advice's legitimate rights, privacy, property or safety, and/or those of a third party and your rights do not override those interests.

Fraud

We may carry out fraud prevention checks using fraud prevention databases. If false or inaccurate information is provided, and/or fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We may access and use the information recorded by fraud prevention agencies from other countries.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you have requested, or we may stop providing existing services to you.

Automated decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk or if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous

submissions; or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us at: advice@expertpensions.com

In order to carry out your instructions, Expert Pensions Advice may also pre-populate the forms of third party websites with the personal data you have supplied us with. This may be done manually or through secure and encrypted data transfers. It is your responsibility to check that the pre-populated data fields are correct. Expert Pensions Advice bears no responsibility for any problems with any applications to third-party companies that arise from any errors or inaccuracies in pre-populated data fields on application forms which we complete on your behalf.

Retention of your data

Expert Pensions Advice will not retain your personal data for longer than is necessary for the purposes for which the personal data is processed. This means that your data will only be retained for as long as it is still required to provide you with services or is necessary for legal reasons. When calculating the appropriate retention period for your data, Expert Pensions Advice considers the nature and sensitivity of the data, the purposes for which Expert Pensions Advice is processing the data, and any applicable statutory retention periods. Using these criteria, Expert Pensions Advice regularly reviews the personal data which we hold and the purposes for which it is held and processed.

When Expert Pensions Advice determines that personal data can no longer be retained (or where you request Expert Pensions Advice to delete your data in accordance with your right to do so (please see below for more information), Expert Pensions Advice ensures that this data is securely deleted or destroyed.

However, please note that, in some circumstances Expert Pensions Advice may decide to retain your personal data for research or statistical purposes and, in such circumstances, Expert Pensions Advice will anonymise your data before retaining it.

For more details about Expert Pensions Advice retention periods, please contact Expert Pensions Advice at advice@expertpensions.com

Accuracy of your data

It is important that the personal data Expert Pensions Advice holds about you is accurate and current. Please keep Expert Pensions Advice informed if your personal data changes during your relationship with us.

Security of your data

In order to protect your personal data, Expert Pensions Advice has appropriate organisational and technical security measures. These measures include storing data on a dedicated and secure server with at least 256-bit encryption, restricting access to your personal data to certain employees, ensuring the Expert Pensions Advice internal IT systems are suitably secure, and implementing procedures to deal with any suspected data breach.

In the unlikely event of a data breach, Expert Pensions Advice will take steps to mitigate any loss or destruction of data and, if required, will notify you and any applicable authority of such a breach.

In addition to the above, where Expert Pensions Advice has given you (or where you have chosen) a password which enables you to access certain parts of the website, you

are responsible for keeping this password confidential and should not share your password with anyone.

Data transfers and sharing your data with third parties

Expert Pensions Advice will not disclose your personal data to third parties other than as described in this section unless it is otherwise legally permitted or required to do so.

Expert Pensions Advice may also need to pass your information to third party service providers which maintain, administer or develop the website on our behalf and the information will only be provided for such limited purposes and as detailed below. In addition, Expert Pensions Advice may provide aggregate statistics about its customers, sales, traffic patterns and related website information to reputable third-parties, but these statistics will include no personally identifiable information.

The third parties to which Expert Pensions Advice may transfer your personal data including, but not limited to (and who may change from time to time) –

- our Identity validation agencies;
- Our SIPP providers;
- Our CRM providers;
- Our Compliance advisers
- Our Product specialists
- Our solicitors

The security of your data is important to us and Expert Pensions Advice will, therefore, only transfer your data to such third parties if:

- you have expressly consented to your data being shared with specific third parties;
- the third party needs to access the personal data for the purposes of providing any contracted services to you;
- the third party has agreed to comply with Expert Pensions Advice's instructions, required data security standards, policies, and procedures and put adequate security measures in place;
- the transfer complies with any applicable cross border transfer restrictions and suitable safeguards have been put in place; and
- a fully executed written contract that contains suitable obligations and protections has been entered into between the parties.

You acknowledge and agree that Expert Pensions Advice may send your information outside of the European Economic Area for processing or use in accordance with this Privacy Policy. As mentioned above, Expert Pensions Advice will only transfer your data where suitable safeguards have been put in place.

For more information on the safeguards used by Expert Pensions Advice when transferring personal data to third parties, please contact Expert Pensions Advice at: advice@expertpensions.com

Your rights

Your personal data is protected by legal rights, which include:

- Right to rectification: you have the right to require us to correct any inaccuracies in your data.
- Right to erasure: you have the right to require us to delete your data, subject to certain legal requirements.

- Right to restriction of processing: you have the right to require us to restrict the way in which we process your personal data. You may wish to restrict processing if, for example:
 - You contest the accuracy of the data and wish to have it corrected;
 - You object to processing but we are required to retain the data for reasons of public interest; or
 - If you would prefer restriction to erasure.
- Right to data portability: you have the right to obtain from us easily and securely the personal data we hold on you for any purpose you see fit.
- Right to object to processing: you have the right to require us to stop processing your personal data should you wish the data to be retained but no longer processed.
- Right of access: you have the right to request access to personal data that we may process about you.
- Right to withdraw consent: you have the right at any time to withdraw consent allowing us to process your personal data.

If you would like to exercise any of the above rights, please:

- put your request in writing;
- include proof of your identity (such as a copy of your driving licence or passport) and address (such as a recent utility or credit card bill); and
- specify the right you wish to exercise.

For more information or to exercise your data protection rights please, please contact us at: advice@expertpensions.com.

We will respond to requests made by you within one month.

Marketing

Expert Pensions Advice may use your personal data to notify you of news about Expert Pensions Advice, changes to the website, special events or new services that Expert Pensions Advice thinks may be of interest to you if you have consented to, and have not at any point opted out from, receiving marketing communications.

If, at any time, you would rather not receive such information, please contact Expert Pensions Advice in writing, either by post or email (to advice@expertpensions.com) to let us know. We will process your request to be opted-out of marketing within 30 days of receipt.

If you ask not to receive such news, Expert Pensions Advice will still need to keep your personal data so that you can continue to use the website and so that Expert Pensions Advice can deal with the administration and security of the website. Expert Pensions Advice will still contact you by email or post for anything necessary for the administration of your membership and to comply with any legal or other important conditions; however, Expert Pensions Advice will not then email you or contact you for promotional purposes without your subsequent consent.

Changes to the Privacy Policy

No changes to this Privacy Policy are valid or have any effect unless agreed by us in writing. We reserve the right to vary this Privacy Policy from time to time. Our updated terms will be displayed on the Expert Pensions Advice website. It is your responsibility to check this Privacy Policy from time to time to verify such variations.

Links to other websites

The Expert Pensions Advice website may contain links to and from other third party websites of interest (advertisers and affiliates). However, once you leave this website, be aware that Expert Pensions Advice does not have any control over such websites. Therefore, Expert Pensions Advice cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

Last updated 8th March 2020