



INTELLIGENTMONEY

**GDPR Privacy Policy**  
**May 2018**

**Data Protection Officer- Hayley Hutchinson**

## 1 Data Privacy Notice

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

*Italicised* words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

## 2 Who We Are

Intelligent Money collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

When we mention "IM", "we", "us" or "our" we are referring to Intelligent Money.

Intelligent Money is a company registered in England and Wales, company number 04398291 whose registered office is at The Shire Hall, High Pavement, Nottingham, NG1 1HN. Intelligent Money is authorised and regulated by the Financial Conduct Authority. Financial Services Register number is 219473.

We provide you with a SIPP/Pension/ISA as we are the Trustees and administrators of these products.

### 3 Privacy Statement

Intelligent Money may disclose Personal Information about you to others if we have your consent to do so in such form of consent as may be required under applicable law.

Subject to applicable laws in your jurisdiction, we may also disclose Personal Information about you to others as we believe to be necessary or appropriate: (a) under applicable law or regulation, including laws or regulations outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public authorities and law enforcement officials, including officials outside your country of residence; (d) to assist or support Financial Crime investigations raised by the regulator, (e) to enforce any of our terms and conditions or policies; (f) to protect our operations or those of any of our affiliates and subsidiaries; (g) to protect the rights, privacy, safety or property of Intelligent Money its affiliates and subsidiaries, you or others; or (h) to permit us to pursue available remedies or limit the damages that we may sustain.

We may also transfer Personal Information to an affiliate, a subsidiary or a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Intelligent Money's business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding.

Access, correction or deletion requests can be made as follows:

Email: [compliance@intelligentmoney.com](mailto:compliance@intelligentmoney.com)

Post: Intelligent Money, The Shire Hall, High Pavement, Nottingham, NG1 1HN.

## 4 The Personal Data We Collect and Use

In the course of providing our service to you we may collect the following personal data when you provide it to us:

- *contact information*
- *identity information*
- *financial information*
- *employment status*
- *health information*
- data about criminal convictions or offences
- details of any *vulnerability*
- details of your dependents and/or beneficiaries under a policy (If you are providing information about another person we expect you to ensure that they know you are doing so and are content with their information being provided to us. You might find it helpful to show them this privacy notice and if they have any concerns please contact us in one of the ways described below.)
- details of other pension products

### **Information collected from other sources**

We also obtain personal data from other sources in the course of providing our *intermediary services*. Where we obtain this information from another party it is their responsibility to make sure they explain that they will be sharing personal data with us and, where necessary, ask permission before sharing information with us.

The personal data we obtain from other sources may include the following:

- From *product providers*:

-*product details*

- From identification and verification checking agencies:

-*identity information*

-*sanction check information*

## How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for Processing	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"><li>• To Provide you with Intermediary Services</li></ul>	Performance of a contract	Your Pension Providers, Your Financial Adviser
<ul style="list-style-type: none"><li>• To carry out Identity checks</li></ul>	Performance of a contract	We use Credit Safe for these checks
<ul style="list-style-type: none"><li>• To retain records of any services provided to you by us in order to defend potential legal claims or complaints</li></ul>	Legitimate Interest	External IT consultant used to help archive data
<ul style="list-style-type: none"><li>• To apply for information from third party investment providers on your behalf to invest your funds</li></ul>	Performance of a contract	Discretionary Fund Managers, Platforms, Investment Managers of your choice

## Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation. Data relating to criminal convictions or offences is also subject to additional levels of protection.

We may process:

- *health information* and *lifestyle information* when providing *intermediary services* in relation to a benefits payment.
- criminal conviction or offence information when providing *intermediary services* in relation to a SIPP/Pension/ISA.

In addition to the lawful basis for processing this information set out in the above table, we will be processing it either (i) for the purpose of arranging or administering a SIPP/Pension/ISA contract or (ii) for the establishment, exercise or defence of legal claims.

In the course of our activities relating to the prevention, detection and investigation of financial crime, we may process criminal conviction or offence information. Where we do so, in addition to the lawful basis for processing this information set out in the above table, we will be processing it for the purpose of compliance with regulatory requirements relating to unlawful acts and dishonesty.

## Marketing

We may use personal data we hold about you to help us identify, tailor and provide you with details of products and services from us that may be of interest to you. We will only do so where we have obtained your consent and then have a legitimate business reason to do this and will do so in accordance with any marketing preferences you have provided to us.

You can opt out of receiving marketing at any time. If you wish to amend your marketing preferences please contact us:

By phone: 0115 94 84 200

By email: [compliance@intelligentmoney.com](mailto:compliance@intelligentmoney.com)

By Post: Intelligent Money, The Shire Hall, High Pavement, Nottingham, NG1 HN

## Whether information has to be provided by you, and if so why

We will tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases you must provide your personal data in order for us to provide you with *intermediary services*.

## How long your personal data will be kept

We will hold your personal data for differing periods of time depending upon the reason we have for processing it. These retention periods are set out below.

Type of Record	Retention Period
All information on your Pension/SIPP/ISA Contract	For a minimum of 5 years after the conclusion of the contract as per the guidelines set out by the Financial Conduct Authority. As long as the contract remains the information will be retained.

## 6 Transfer of your Information Outside of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

## 7 Your Rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

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

### ***To access personal data***

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

### ***To rectify / erase personal data***

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

### ***To restrict our use of personal data***

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

### ***To object to use of personal data***

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

### ***To request a transfer of personal data***

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.



### ***To contest decisions based on automatic decision making***

If we made a decision about you based solely by automated means (i.e. with no human intervention), and the decision made by *us* produces a legal effect concerning you, or significantly affects you, you may have the right to contest that decision, express your point of view and ask for a human review. These rights do not apply where *we* are authorised by law to make such decisions and have adopted suitable safeguards in *our* decision making processes to protect your rights and freedoms.

### ***You can contact us for more information***

If you are not satisfied with the level of information provided in this privacy notice, you can ask *us* about what personal data *we* have about you, what *we* use your information for, who *we* disclose your information to, whether *we* transfer it abroad, how *we* protect it, how long *we* keep it for, what rights you have, how you can make a complaint, where *we* got your data from and whether *we* have carried out any automated decision making using your personal data.

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

- email or write to our Data Protection Officer Hayley Hutchinson at [compliance@intelligentmoney.com](mailto:compliance@intelligentmoney.com) or Intelligent Money, The Shire Hall, High Pavement, Nottingham, NG1 1HN;
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility bill); and
- let us know the information to which your request relates.

## **8 Keeping your Personal Data Secure**

*We* have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. *We* limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. *We* also have procedures in place to deal with any suspected data security breach. *We* will notify you and any applicable regulator of a suspected data security breach where *we* are legally required to do so.

## 9 Our Supervisory Authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* ([www.ico.org.uk](http://www.ico.org.uk)).

We ask that you please attempt to resolve any issues with us before the ICO.

### **How to contact us**

Please contact our Data Protection Officer, Hayley Hutchinson if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer please send an email to [compliance@intelligentmoney.com](mailto:compliance@intelligentmoney.com) or write to Intelligent Money, The Shire Hall, High Pavement, Nottingham, NG1 1HN.

## Senior Management sign off

Ian Stewart- Executive Director (Compliance)

May 2018

## Glossary of Terms

<b>we, us or our</b>	<p>Intelligent Money</p> <p>A company registered in England and Wales company number 04398291 and having its registered office at The Shire Hall, High Pavement, Nottingham, NG1 1HN</p>
<b>contact information</b>	<p>these are details that can be used to contact a person, including title, first name, surname, personal telephone number, fax, email address, home address, country, postcode or city of residence. This may also include work contact information such as work telephone number, fax, work email and work address</p>
<b>data controller</b>	<p>means a natural or legal person (such as a company) which determines the means and purposes of processing of personal data. For example, <i>we</i> are your data controller as <i>we</i> determine how <i>we</i> will collect personal data from you, the scope of data which will be collected, and the purposes for which it will be used in the course of <i>us</i> providing you with <i>intermediary services</i></p>
<b>data protection regulation</b>	<p>applicable data privacy and protection laws</p>
<b>employment status</b>	<p>this is information about your work, if you are employed, self-employed, unemployed, a student or on job seeker allowance</p>
<b>FCA</b>	<p>the Financial Conduct Authority, being the independent watchdog that regulates financial services</p>
<b>financial information</b>	<p>this is information relating to your financial status, including salary/income, outgoings/expenditure, tax rate and P60</p>
<b>health information</b>	<p>this is information relating to your medical history, including symptoms, diagnoses, procedures and outcomes, as well as information about your height and weight. This could include previous and current or persistent medical conditions and family medical history</p>
<b>identity information</b>	<p>this is any information that can be used to distinguish a person or verify their identity, such as name, date of birth, place of birth, gender, marital status, national identity card/number, passport, drivers licence and national insurance number</p>
<b>intermediary services</b>	<p>these are the services we provide to you in relation to the products, which may include:</p> <p style="padding-left: 40px;">Administration of your SIPP/Pension/ISA</p>
<b>lifestyle information</b>	<p>this includes both work and leisure behaviour patterns. Most relevant to your <i>products</i> may be your smoker status, alcohol consumption, health, retirement age and exercise habits</p>
<b>product</b>	<p>this is a SIPP/Pension/ISA in respect of which we provide <i>intermediary services</i> to you</p>
<b>product provider</b>	<p>a company which provides investment, pension, protection and/or general insurance products (for a list of product providers which <i>we</i> work with, please contact <i>us</i> – see <i>How to contact us</i> above)</p>