

Xafinity SIPP Services Limited ('Xafinity') and your data

Xafinity takes looking after your personal information (known as 'data') very seriously. We're committed to ensuring that your data is only used for the specific purposes set out below and that it's secure at all times.

Xafinity SIPP Services Limited is a Data Controller in common with the pension scheme trustees. This means that we are each legally responsible for our own compliance with data protection laws in relation to each of our respective processing activities.

Where did Xafinity get your data from?

We take this from your completed Xafinity SSAS member application form together with any other data provided by you or your appointed financial adviser or other personal representative.

How will Xafinity use your data?

Xafinity has what's called a 'legitimate interest' to process your data, via an appointment by the Trustees to provide administration services to the Xafinity SSAS (the scheme). Xafinity processes your data under this contract in order to administer the SSAS. 'Administering' your pension plan means:

- managing contributions made to the scheme;
- arranging investments as instructed by the Trustees;
- issuing you with information about your benefits under the scheme (including quotations);
- paying claims from the scheme;
- providing annual valuations; and
- notifying you of any regulatory changes that may affect the contributions allowable into, and benefits out of, the scheme.

Xafinity also processes your data in order to comply with our legal obligations as Trustee and/or Scheme Administrator (as defined by HMRC) of the scheme. Such processing may include:

- disclosing details to HMRC for tax purposes;
- disclosure to law enforcement agencies and courts;
- various regulatory returns to Financial Conduct Authority and/or the Pensions Regulator.

Your data will **only** be used by Xafinity for these purposes.

What information do we need and why?

We only ask you for information about you that is necessary to administer your pension plan; without this information, we may not be able to provide these services. The information we need about you in order to provide these services includes:

- personal information, including full name, national insurance number, nationality, date of birth and planned retirement age;
- if you are subject to a bankruptcy order;
- your contact details (postal address, e-mail and phone number)
- contribution information;
- beneficiary information (where appropriate);
- your bank details (when you wish to start taking benefits);
- other pension schemes of which you are a member (should you wish to transfer benefits into or out of the scheme; and
- health information, including medical reports. We will only ask for this information if you wish to claim benefits on health grounds and we will need your specific consent in this instance.

Who do Xafinity share your data with?

We'll only share your data with third parties if it's necessary to administer your pension plan. This means that your information may be shared with:

- any party appointed by you, including your financial adviser, or personal representative;
- investment managers and legal and financial advisers, in order that they may provide advice to the Trustees;
- investment providers holding the scheme assets;
- the scheme bank provider(s);
- law enforcement agencies (subject to any requests being legally made);
- fraud prevention agencies so that we may comply with money laundering and financial crime prevention laws;
- regulators as required (including HMRC, the Pensions Regulator, the Financial Conduct Authority, the Information Commissioners Office);
- certain approved suppliers used by Xafinity. These may include suppliers of payroll services, printing and mailing services, offsite storage, suppliers of administration systems, hosting of various computer systems, information technology services and electronic and paper documentation management; and
- other pension schemes of which you are a member (should you wish to transfer benefits into or out of the scheme).

We'll need your consent (or that of your personal representative) to share your data with anybody else.

Your data will not be transferred to anyone outside the European Economic Area.

What are your rights?

You have the right to:

- request copies of the personal data we hold about you and we will provide that within one calendar month. If you wish to do so you should contact us at the address below;
- correct any information that is incorrect, inaccurate or incomplete;
- restrict what we do with your information until we correct it or if you believe we are using your data unlawfully;
- withdraw your consent to us processing your health information (we will only obtain for the purposes of you claiming benefits on health grounds). Any processing we undertake shall remain lawful until such time as you withdraw consent; and
- object to our processing based on legitimate interests; however, you must have grounds (to object) based on your particular situation.

Xafinity has formal documented Information Security and Data protection policies that set out the security measures currently implemented and maintained. These core policies are supported by additional policies covering our use of data encryption, physical security of our offices and data centres and acceptable usage of email, internet facilities and telephone. Copies of these policies are available on request.

How long do we keep the information for?

We retain your information for a number of reasons including to demonstrate:

- the scheme has complied with its rules;
- compliance with regulatory rules (e.g. HMRC, the Pensions Regulator); and
- that Xafinity is meeting its contractual and legal obligations.

This means that we keep all of your information whilst we administer the SSAS, even if you cease to be a member, and after the provision of services to the SSAS, until any possible legal responsibilities or liabilities have ended.

We will normally hold your information for a period of 12 years following you ceasing to be a member of the scheme.

A copy of our retention policy is available on request.

How to complain

If you are not happy with how we process your data, you will have the right to complain to the Information Commissioner and we can provide details about how to do that.

Contacting Xafinity

Xafinity SIPP Services Limited

Scotia House

Castle Business Park

Stirling

FK9 4TZ

Contacting the scheme trustees

The scheme trustees can be contacted at the above address.

Xafinity SIPP Services Limited is authorised and regulated by the Financial Conduct Authority and its subsidiaries Hazell Carr (ES) Services Limited, Hazell Carr (PN) Services Limited, Hazell Carr (SA) Services Limited, Hazell Carr (SG) Services Limited and Hazell Carr (AT) Services Limited are Appointed Representatives of Xafinity SIPP Services Limited. Registered Offices. Xafinity SIPP Services Limited (SC069096), Hazell Carr (SA) Services Limited (SC086807) and Hazell Carr (AT) Services Limited (SC420031) are registered in Scotland at Scotia House, Castle Business Park, Stirling, FK9 4TZ. Xafinity Pension Trustees Limited (01450089), Hazell Carr (ES) Services Limited (02372343), Hazell Carr (PN) Services Limited (00236752) and Hazell Carr (SG) Services Limited (01867603) are registered in England & Wales at Phoenix House, 1 Station Hill, Reading, RG1 1NB. Xafinity SSAS is a trading name of Xafinity SIPP Services Limited and its subsidiaries. Part of the Xafinity Group. 013XSS (05/18)