

PRIVACY NOTICE

INTRODUCTION

This privacy notice provides you with information on how Nigel Sloam & Co and its associated companies (the NSS Group) will collect, use and protect your personal information.

This privacy notice applies to you if you are an existing or new client of the NSS Group. This Privacy Policy applies to all services offered by us, except where otherwise noted.

We have done our best to present the information in this policy in clear and plain language, and we have structured it in a way to allow you to quickly find the information that is most important to you.

We reserve the right to change our privacy statement from time to time. However, this will not affect your rights under this Privacy Information Notice and we will always collect, process, share and store your personal information with security and within the parameters of the law.

We will update the Privacy Policy page content and last modified date on our website. This privacy statement was last modified 8 October 2019.

PRIVACY STATEMENT

We are committed to keeping your personal data safe and to ensuring the integrity and security of any personal data we may process.

You should read this privacy notice very carefully as it contains important information on the way in which we will process your personal data, in particular:

- The personal information we collect about you
- Our legal basis for processing your personal information
- What we do with your personal information
- Who your personal information may be shared with
- Your rights as a data subject under the Data Protection regulation

If you have any queries or requests concerning your personal information or how we process it, please contact the **Data Protection Officer** (DPO) for the NSS Group:

By email DPO@nigelsloam.co.uk, by telephone 020 8209 1222 or by post at Nigel Sloam & Co, Roman House, 296 Golders Green Road, London NW11 9PY.

WHO WE ARE

Nigel Sloam & Co of Roman House, 296 Golders Green Road, London NW11 9PY. Nigel Sloam & Co is the Controller of personal data relating to its clients, for the purposes of pension and actuarial consultancy services.

Nigel Sloam & Co is a member of the Association of Member-Directed Pension Schemes. This firm is authorised and regulated by The Financial Conduct Authority and is also regulated by the Institute of Faculty of Actuaries in respect of a range of investment activities.

NSS Trustees Limited – our independent trustee company for SSAS business and our SIPP provider - of Roman House, 296 Golders Green Road, London NW11 9PY is a company incorporated and registered in England with company number 04141920. NSS Trustees Limited is authorised and regulated by the Financial conduct Authority to operate personal pension schemes.

NSS Actuarial SAM, Le Mirabel-Suite No 507, 4, Avenue des Citronniers, MC 98000, Monaco

Annandale Financial Management Limited, 5 Technology Park, Colindeep Lane, Colindale, London NW9 6BX

NSS Independent Trustees Ltd, Roman House, 296 Golders Green Road, London NW11 9PY

NSS Legal Limited, Roman House, 296 Golders Green Road, London NW11 9PY

Collectively known as “the NSS Group” within this document.

All of whom act as the **Data Processors** and **Data Controllers** of your **Personal Data**.

GDPR

In terms of Data Protection Legislation, before 25 May 2018 we were governed by the EU Data Protection Directive 95/46 and all national implementing laws (including the UK Data Protection ACT 1998. On 25 May 2018, the EU **General Data Protection Regulation 2016/679 (“GDPR”)** together with all other applicable and national implementing legislation including the Data Protection Act 2018 relating to privacy or data protection came into force. This privacy policy will set out how we use this policy in terms of our business and how we implement the principles of GDPR to keep your information safe.

INFORMATION

Personal Data - What information do we collect

- Title
- Full Name
- Permanent residential address and previous address (if you have lived in your current address less than three years)
- Telephone contact number(s)
- Email address(es)
- Date of birth and/or age
- Expected retirement age
- National Insurance Number
- Nationality and any dual Nationality
- Country of residence
- Marital/Civil Partnership status
- Details of spouse’s or registered civil partner’s date of birth
- Details of any dependants
- Occupation and Employment status and Employer’s name and address
- Bankruptcy information
- Pension information including details of pension benefits, protection and contribution restrictions
- Financial information about you
- Your bank account details
- Tax status
- Adviser details
- Photographic ID, utility bill to verify your identity and address, and any other anti-money laundering (AML) documentation as required
- Outcome of identity searches and anti-money laundering due diligence (e.g. politically exposed individual).

It is important that the information we hold about you is correct and current.

Please keep us informed if your personal data changes during your relationship with us by calling the office on 0208 209 1222, emailing pensionsadmin@nigelsloam.co.uk or writing to us at Nigel Sloam & Co, Roman House, 296 Golders Green Road, London NW11 9PY.

Personal Data – How do we collect this information

We may ask you to provide us with relevant information by filling in forms (in paper or electronic format) or by corresponding with us by phone, email, post or face to face in meetings.

We may also receive personal information about you from third parties - such as electronic verification services to verify your identity - who we work closely with and who are entitled to share that information as permitted by applicable law.

Personal Data – Why do we collect and process this information

We collect personal information from you to perform our contractual and legal obligations to you.

When you complete an application form or provide us with any personal information by the methods detailed above, you understand that we will be processing your personal data for the purpose set out below.

We will only process your personal data where we have a legal basis to do so, such as:

- Where appropriate you have provided your consent to the company;
- Processing is necessary for the performance of a contract between you and any of the NSS Group, or to take steps to enter into a contract with us
- Processing is necessary for compliance with a legal or regulatory obligation covering our duties where applicable including as Trustees, Scheme Administrators, Authorised Practitioners and Scheme Actuaries (see more information on this in the next section)
- The company has a legitimate interest in its capacity as either adviser and/or trustee to process the data. Any decision to process data based on legitimate interest will be made on a case by case basis and in line with the guidance set out in UK Data Protection legislation.

Personal Data – How do we store and share this information securely

The security and storage of your data is important to us. The NSS Group have security measures in place and we take all reasonable measures to keep your personal data secure, preventing it from being lost, stolen, altered, used accessed or disclosed in any unauthorised way.

We have technology to protect personal data from loss, misuse, alteration or destruction and ensure that, where possible, physical access to our buildings is carefully controlled. We also insist that all staff agree to protect confidentiality of all information.

When sending you confidential material electronically relating to your pension or investment we use a secure portal which you are required to log into by creating an account, which is personal to you, we will not have access to your login details for this account, and this helps to prevent interception by any third parties which can happen when sending by unsecured email.

Where you require us to send non-secure electronic communications, we will require your specific consent and do not accept liability for any malicious interference.

Personal Data - How do we use this information

In most cases, your personal data will be processed to perform our services for you, as explained above, and/or to comply with a legal obligation.

Legal purposes for us to use and process your personal data include but are not limited to:

Providing personal data to others where it is necessary in the running of your pension or investments and for legal and regulatory purposes and related disclosures e.g. passing your personal data to other NSS Group companies and third-party sub-contractors including our software and IT providers.

- We may keep your personal data after your product has closed, where we are required to do so by law (see **Data Retention** section below).
- For prevention, detection, investigation and reporting of crime, which may include providing your personal data to fraud prevention agencies.
- To verify your identity for anti-money laundering purposes. In this regard we utilise the services of a third party electronic verification service and/or ask our clients to provide us with up to date ID documents such as passport or photo driving licence and proof of current home address such as utility bill dated within the last three months or photo driving licence.
- To monitor your communication with us.
- For information security purposes.
- To contact you about your product, including for debt recovery purposes.
- To comply with orders of the courts of competent jurisdictions, and for the establishment and defence of legal rights.

All our UK third party service providers and companies within the NSS Group must comply with data protection laws. We do not permit third party processors to use your personal data for their own purposes. We require third party processors to process personal data in accordance with our instruction. We do not currently utilise the services of any EU third party service providers.

Personal Data - When, how and with whom we may share your personal information

When	With Whom	How
When required by law, when performing a contract with you, when we have legitimate interest to do so or otherwise with your consent	The NSS Group	Within the parameters of legal and regulatory guidelines
	Third party subcontractors who help us to provide our services to you such as bank account management service providers, IT services companies, companies involved in commercial property investment and management, as well custody investment services companies	
	Investment managers, investment providers and third parties who you invest with through your product	
	Other companies involved in providing services to us - listed in the attached schedule.	
	Our professional advisers, including accountants, auditors and lawyers	
	Governmental, regulatory and taxation bodies, such as the Information Commissioner's Office (ICO), Financial Conduct Authority (FCA) and Her Majesty's Revenue and Customs (HMRC)	
	Other parties linked to your product, such as your selected beneficiaries, when necessary	
	Any other third party permitted by law and in the following circumstances: <ul style="list-style-type: none"> ○ To protect the security of our business ○ To comply with orders from a court of competent jurisdictions ○ In an emergency, to protect your vital interests ○ If we sell, merge, restructure or otherwise reorganise our business ○ When dealing with third parties under your instructions or otherwise as required by law 	

Retention Period - How long we keep your personal information on file

We may retain information about you after we have ceased providing services or if you do not proceed with us.

This information will only be held for as long as is necessary, to meet any legal, regulatory or fraud prevention requirements. We regularly review our records to ensure that we only retain your personal information for as long as is necessary for the purposes set out in this Privacy Information Notice.

The nature of pensions is that data will usually be held for an extensive period of time given the long-term nature of the contract in place. The retention details set out below are the timeframes for which we would hold data, as standard. Please note, we may keep your personal data for a longer period of time in the event of ongoing complaints, legal claims or where required to do so by law.

Type of Data	Retention Period
Personal Data and Special Category Data received via paper, electronic means (e.g. email or online application) or verbally	A minimum of 6 years from the date of the last activity. Examples of last activity include, but are not limited to: <ul style="list-style-type: none"> • When a transfer out to a new scheme has finalised • When a plan depletion is finalised (such as via flexi-access drawdown) • When a plan is formally closed after being considered bankrupt. A bankrupt plan no longer contains assets (i.e. cash, equities, commercial property etc.) with an associated value and is not likely to realise a value in the future • From the date a complaint/legal matter is closed if this is later than the plan closing date • Where you are a property tenant of a pension scheme, the data will be retained for a minimum of 6 years from the date of the last activity on the scheme that held the property you leased. This means your data may be held for a minimum of 6 years, so we can maintain a full record for an active or recently closed pension scheme.
Personal data processed for regulatory returns (e.g. to the PRA or FCA)	Indefinitely with the exception of the HMRC Relief at Source Annual Information Return, which will be retained for a minimum of 6 years
Personal Data or Special Category Data where you did not proceed with the services with the NSS Group	A minimum of 6 years from the date of the last activity. Examples of last activity include, but are not limited to: <ul style="list-style-type: none"> • When we returned an application to you as it was no longer proceeding • When we generated a key features illustration for you • If initial due diligence is required on a pension scheme prior to transfer-in, a minimum of 6 years from the date such transaction was terminated.
<p>Where we no longer need your personal information and are no longer obliged by law to keep it on file, we will dispose of it in a safe and secure manner (without further notice to you).</p>	
<p>Personal Data - Processing your information in the event of your death</p>	
<p>The data protection laws apply to the personal data of living persons. However, we will continue to treat your personal data in accordance with the spirit of the General Data Protection Regulation 2016/679 ("GDPR") together with all other applicable and national implementing legislation including the Data Protection Act 2018 in the event of your death.</p>	

Personal Data - Your information = Your rights

By law you have the right to:

- Right to be informed
- Request access to your personal data
- Request correction of the personal data that we hold about you
- Request erasure of your personal data
- Object to processing of your personal data
- Request the restriction of processing of your personal data
- Not be subject to automated decision making, including profiling
- Data portability
- Make a complaint to the Information Commissioner's Office (ICO) (for further details see below)
- Withdraw consent at any time

We will comply with such requests so as to comply with legal and regulatory guidelines.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who does not have the right to receive it.

Complaints about our services

If we receive a complaint from you about our services, your personal data will be used in the course of dealing with the complaint and, in some cases, this will involve providing your personal data to the appropriate ombudsman service.

Summary of response times to individual rights

Should you ever need to exercise your rights under the GDPR in relation to our services, the below table provides guidance from the ICO as to 'expected' response times:

Type	Response Time
Right to be informed	
➤ Data obtained directly	At the time data is obtained
➤ Data not obtained directly	Within 1 month data is obtained
Right of access	Within 1 month
Right to rectification	Within 1 month or can be extended by further 2 months if complex
Right to erasure	Within 1 month
Right to restrict processing	Within 1 month
Right to object	Within 1 month
Data Portability	Within 1 month or can be extended by further 2 months if complex

The Information Commissioner's Office (ICO)

We will be more than happy to help should you have any complaints about the processing of your personal data. You have the right to lodge a complaint with the UK's Supervisory Authority, the ICO, who are the national authority responsible for the protection of personal data

You can obtain general data protection information or exercise your right to make a complaint if you feel we have not handled your personal data correctly, by contacting the Information Commissioner's Office at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

COMMUNICATION

Email containing personal data

You and your advisers may, from time to time, send personal information to us electronically. We are not responsible for the way in which you or your agent handles personal information.

When we communicate personal information to you or your agent, we take reasonable steps to ensure this is done so securely and where appropriate this is done through our secure email portal. You are required to be a registered authorised user with a username and password in order for us to verify you as an authorised user and use the portal by way of a secure method of communication.

Alternatively, with your consent we can issue password protected documents or with verified consent by open email.

Post

We are not responsible for how we receive mail, however when we send confidential or original materials in hard copy to you by post we will use Royal Mail and, when appropriate, we will use the secure method of Royal Mail Recorded Delivery or, if documents are particularly urgent, Royal Mail Special Delivery.

Telephone

We do not record telephone conversations with our clients.

Cookies and similar technology

A cookie is a small text file that is downloaded onto 'terminal equipment' (eg a computer or smartphone). It allows us to recognise the device you are using and store some information about your preferences or past actions.

We also use cookies for legitimate business interests to improve the website experience and to analyse the number of visitors to the website. You can choose not to allow the use of some of these cookies during any visit to our website. To update your preferences click www.nigelsloam.co.uk/82/cookie-policy

For more information about cookies, please visit the ICO website www.ico.org.uk

Other websites and social media

Our website may contain links to other websites which are outside of our control and this Privacy Information Notice will no longer apply. We are not responsible for the information handling practices of third-party sites or service and we encourage you to read the privacy information notices appearing on those sites or services.

If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their Privacy Policy, which may differ from ours. You must contact them to determine their Privacy Policy.

Mobile data

You or your advisers may use mobile applications to access our website, applications and services. Mobile applications for this purpose may be provided by third parties. Where mobile applications are provided by a third party, you must read that third party's own privacy information notice in relation to that application. We are not responsible for third party mobile applications and their use of your personal information.

Marketing

From time to time, where you have provided consent, we may use your personal information to contact you by telephone, post, email or by any other electronic means, with details of our products and services, which we feel may be of interest to you.

We will ensure that we only gain consent via a clear and affirmative act, freely given by you that indicates your consent to specific purposes.

You have the right to withdraw your consent at any time and can do so by calling the office on 0208 209 1222, emailing info@nigelsloam.co.uk or writing to us at Nigel Sloam & Co, Roman House, 296 Golders Green Road, London NW11 9PY.

Online Enquiries

If you make an enquiry via the online enquiry facility on our website, the information we collect, such as your name, email address and your status, will be used to answer your enquiry. We may cross reference the information you provide with information held on our systems, to ascertain the most appropriate department area or person within the NSS Group to handle your enquiry and may hold this data for future analysis, or reference purposes.

Monitoring Communications

We monitor and maintain your communications with us in accordance with applicable laws. This includes emails, secure portal emails, letters, faxes and any social media communications with us. We do this for the purposes of complying with legal obligations, to prevent and detect crime, quality control, to protect the security of our communications systems as well as our procedures and when we need to consider a record of what has been sent (such as if you make a complaint to us).

Special Categories of personal data

We are required to gain your explicit consent prior to processing any special category data (sensitive information) about you, for example information about your physical health or condition.

Where we require such consent, we will provide you with sufficient information to allow you to make an informed decision. We will ensure that we only gain consent via a clear and affirmative act, freely given by you that indicates your consent to specific purposes.

You have the right to withdraw your consent at any time and can do so by calling the office on 0208 209 1222, emailing info@nigelsloam.co.uk or writing to us at Nigel Sloam & Co, Roman House, 296 Golders Green Road, London NW11 9PY.

Less commonly, we may process this type of personal data where it is needed to protect yours or another person's vital interests where you are not capable of providing your consent.

Criminal convictions and offences

We will process personal data relating to criminal convictions and offences where there is a lawful basis in our capacity as trustee and under trust law to do so and where European Union law and United Kingdom law permits.

Automated Decision Making

Automated decision making is where personal data is used to make decisions without any human intervention, for example banks using credit scoring and for credit card and loan applications.

The NSS Group **do not** conduct automated decision making.

Transfers outside the EU/International Transfers

We may, when necessary, transfer your data outside the UK and/or European Economic Area (EEA). Some countries are considered by the European Union Commission (EC) to have adequate data protection laws, but for other countries appropriate safeguards need to be taken to protect your personal data, if possible.

You shall have the right to be informed of the appropriate safeguards relating to the transfer. We will advise you of this prior to any such processing taking place.

For further information on transferring your data outside the EU, please contact DPO@nigelsloam.co.uk or telephone on 020 8209 1222.

Consent and Children

Where personal data is held in respect of children, we will where appropriate obtain the written consent of the child's parent or guardian.

LEGAL STATEMENT ABOUT THIS PRIVACY POLICY

This privacy policy is not designed to form a legally binding contract. It is a guide to the personal information we collect, hold and process for you.

GLOSSARY

Associated Companies	Nigel Sloam & Co NSS Trustees Limited NSS Actuaries SAM Annandale Financial Management Limited NSS Independent Trustees Ltd NSS Legal Limited "The NSS Group"
Data Controller	The person or business who determines the purposes and means of processing personal information.
Data Processor	The person or business responsible for processing personal data on behalf of the Data Controller
Data Subject	You
Data Retention	The period for which we are required, by law, to retain your information.
GDPR	General Data Protection Regulation 2016/679
Personal Data	•Personal data is information that relates to an identified or identifiable individual.
Special category data	•Special category data is personal data which the GDPR says is more sensitive, and so needs more protection. For example, information about an individual's: •race; •ethnic origin; •politics; •religion; •trade union membership; •genetics; •biometrics (where used for ID purposes); •health; or •sexual orientation.

CONTACT US

Should you wish to discuss this Privacy Information Notice or have any queries in relation to our use of your personal data, we can be contacted at:

Data Protection Officer
Nigel Sloam & Co
Roman House
296 Golders Green Road
London
NW11 9PY

Telephone: 020 209 1222

Fax: 020 8455 3973

Email: DPO@nigelsloam.co.uk