

Trustee and Company Directors Privacy Notice

This Privacy Notice explains how Quattro Pensions handle and share your data to ensure that your privacy is protected at all times and that compliance with all relevant data protection legislation is achieved.

This privacy notice covers:

- Trustees, companies and others with whom we have or are looking to obtain a contract to provide services
- Former trustees or directors we have held a contract with

It does not cover links to external websites from within our website. If you visit any other websites, we recommend you read their own privacy notices.

Who controls your data?

Quattro Pensions is the data controller in relation to data held on current, former and prospective trustees or directors for whom we have provided, or are working to provide, services to or enter into a contract or agreement with.

We are committed to protecting and respecting your privacy at all times. Quattro Pensions will never share your data for marketing purposes and will only share data where it is required to provide our services, and to meet our obligations and those of relevant trustees and sponsoring employers of schemes to which we provide our services.

Why do we need to hold your data?

If you have a contract with us, we hold this information to help us issue communications and information, to pay fees and expenses, and for general administration (for example, to ensure documentation is properly executed and drafted, trustees are validly appointed, conflicts of interest are identified and managed and/or appropriate records are maintained). If we are tendering for a contract with you, we may ask for information to help us understand your needs.

We have a legal obligation under the UK anti-money laundering regime to carry out checks and due diligence to prevent and detect criminal activity.

What data do we collect?

We may collect and process personal information about you including (but not limited to):

- Personal details to contact or identify you, such as your name, gender, date of birth, address, telephone numbers and email addresses.
- Employment information, such as service dates.
- Details of any nominated representative you may instruct to deal with us on your behalf.
- Other financial information such as bank account details or earnings details.
- Details of conflicts of interest.

Do we hold any special category data?

Examples of special category data may include information that could reveal your ethnic or racial origin, religious or political beliefs, sexual orientation or information relating to your health.

In some cases when verifying your identity evidence supplied may contain special category data. Inadvertent disclosure of special category data is exempt from extra lawful basis conditions under the Data Protection Act.

On what basis do we process this information?

Legitimate Interests: Your data is processed on the basis of the legitimate interests of Quattro Pensions in order to properly act on behalf of our clients and enable us to carry out the above mentioned services.

Legal Obligation – Your data is processed because it is necessary for compliance with a legal duty or obligation. This will also apply to other data controllers in some instances.

Contractual – If we have a contract with you, we will be processing your data in order to perform the requirements of that contract.

No automated profiling is carried out by Quattro Pensions.

Where did the data come from?

Your information will be provided to us by the trustees either directly or via one of the trustees' service providers, or your company if you are a director. Some of your information may have been obtained from publicly accessible data like Companies House, trust deeds, and HMRC.

If you have a contract with us, we will ask you to provide us with information in order to fulfil our duties under the contract. We will also seek information from SmartSearch in order to verify your identity. We may do this in advance of establishing a contract.

Sharing your data

We may share your data with one or more of the following in order to provide services to our clients, and to comply with legislation:

- Other service providers such as the scheme administrator, the Scheme Actuary, the Scheme Auditor, the Scheme's legal advisers and the Trustees' bank
- Insurance Companies
- Investment managers and Additional Voluntary Contributions (AVC) providers
- Government bodies such as HMRC, the Department for Work and Pensions and relevant regulatory bodies
- Your bank or building society
- The Company that you work for.

Other third parties may include:

IT partners, tracing agencies, external printing companies etc.

Should any unforeseen obligations be placed upon us or one of our service providers, it may be necessary to share your data with a party not mentioned in this notice should there be a legal or regulatory requirement to do so.

Parties might include:

HMRC, the Police, National Crime Agency, the Department for Work and Pensions, regulatory bodies etc.

Reasons might include:

Calculation and recording information in relation to personal tax or to prevent or detect tax evasion, criminal or fraudulent activities.

When sharing data, only the minimum amount required for the legitimate purpose will be shared. Data will only be shared if it is necessary in order for the third party to carry out their function and wherever possible it will be sent in an anonymous format. Any third parties who we share your data with, other than government or regulatory bodies, will have been subject to appropriate assessment and relevant checks to ensure data is handled securely and in line with data protection laws.

Data is not currently shared with parties located outside the EU. Should this change in the future all parties involved will take appropriate steps to ensure your personal data is protected in accordance with applicable laws.

How long will we hold your data?

Your data will be retained for no longer than is required for the purposes set out in this notice and to comply with any relevant legislation.

If you have a contract with us, data will be held for a minimum of 15 years following the cessation of any business activity to comply with legal obligations, law, and/or the legitimate interests of Quattro Pensions.

How do we keep your data secure?

We are committed to protecting your personal data. We take all reasonable steps to safeguard the confidentiality of personal data. We carry out appropriate assessment and any relevant checks on service providers to ensure adequate organisational and technical measures are in place to safeguard personal data.

Your rights in relation to your personal data

You have the following rights under the Data Protection Laws:

The right to be informed – We have provided this Privacy notice to give you details on the ways in which we use, share and store your data.

The right of access – You can request information on the processing of your data and request access to the information we hold on you.

The right to rectification – If your personal data is incorrect or incomplete you can request that we change or update it.

The right to erasure – You can request the erasure of your data if there is no lawful reason as to why it should still need to be processed or stored.

The right to restrict processing – You can request that your data is no longer processed even though it may need to be stored to comply with a legitimate interest or legal obligation or contract if there is no lawful reason to continue actively processing your data.

The right to data portability – You are able to obtain your data to use for your own reasons or to use your data to engage different services.

The right to object – If you felt that we had no lawful reason for processing your data.

Rights in relation to automated decision making and profiling – We do not carry out automated decision making.

The right to complain to the Information Commissioner – If you believe we have not handled your personal data in accordance with Data Protection Laws.

The right to compensation via the UK tribunal service should you suffer any damages due to the contravention of Data Protection Laws.

If you wish to exercise any of these rights, please get in touch using the contact details below. Should we be unable to comply with your request, we will write to you and explain why.

Following an assessment we have decided that there is no requirement to appoint a Data Protection Officer (DPO). However, we felt it would be useful to appoint a data protection representative to deal with any questions or queries you may have.

Data Protection Representative contact details

Email: Compliance@quattropensions.com

Telephone: 01527 598 688

Post: Compliance
Quattro Pensions Consulting Limited
Prospect House
Fishing Line Road
Redditch
B97 6EW

Complaints or concerns

If you are not happy in any way with how we have processed or handled your personal information, please contact us using the details above.

You also have the right to complain about data protection matters to the Information Commissioner's Office (ICO).

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO from their website (<https://ico.org.uk/>). The ICO can also be contacted by calling 0303 123 1113.

Updates to our Privacy Notice

We may update or amend this Privacy Notice from time to time to comply with law, regulations or to meet changing business requirements. Printed copies are available on request.

This Privacy Notice was last updated in May 2018.