



PRIVACY POLICY – HOW WE TREAT YOUR DATA

This policy explains how any personal data we collect from you, or that you provide to us, will be treated by us, and how we comply with our responsibilities under applicable data protection legislation.

WHO ARE WE?

We are MJF SIPP Operator Limited, MJF Scheme Administrator Limited, MJF Pension Trustees Limited, MJF SSAS Trustees Limited and Michael J Field Consulting Actuaries (collectively referred to as “MJF”) and we are committed to maintaining, protecting and respecting the confidentiality, integrity and security of personal information about each of our clients (“you”).

If you give us any personal information about yourself or others, we promise to treat it securely, fairly and lawfully.

HOW TO CONTACT US

If you have any questions about this Privacy Policy or the information we collect or hold about you, please contact

The Data Protection Officer
Michael J Field Consulting Actuaries
8 St Stephen Street
Manchester
M3 6AY

Email: info@michaeljfield.com

Tel: +44 (0)161 834 3297

WHAT INFORMATION WE COLLECT AND WHY

We collect information about you in order to administer your pension arrangement with us. This includes providing information on the benefits available to you, reporting to HMRC and other regulatory authorities and complying with relevant legislation.

The information we collect about you includes:

- Information on who you are eg your name, date of birth, sex, national insurance number and contact details
- Details of your passport, driving licence or other documents used for identification purposes
- Details of your pension arrangements eg your intended retirement age, information on your other existing policies and pension schemes
- Your investment strategies and objectives
- Your employment status and details of your employer
- Information on who you would like to benefit from any death benefits
- Your bank account information

- Information relating to your health. This information will only be collected in limited circumstances where it is relevant to action being taken in connection with the pension scheme.
- Any further personal information required as part of the provision of our services
- Information on a child where a pension arrangement is being set up by a guardian on behalf of a child.
- Visual images of you and your vehicle collected via CCTV if you visit our office

WHERE WE COLLECT INFORMATION FROM

You may give us information about you by filling in forms that we have given to you, for example an application form when you first set up the scheme, a contribution form each time you pay a contribution, a retirement option form when you start taking benefits from the scheme etc. You may also provide information by meeting with us or corresponding with us via phone, email, fax or otherwise.

We may also collect information from third parties acting on your behalf, for example your financial adviser, an investment manager, accountant, insurance company, employer etc.

In order to provide our services to you we work closely with third parties, for example, to provide pension payroll services, ID verification and payment services among others. We may receive personal data from these third parties. We may also reference publicly available sources of information eg Companies House to check or update the information we hold about you.

HOW WE USE YOUR INFORMATION

We may use your information in the following ways:

- To administer your pension scheme with us and comply with all the legal and trust obligations relating to this
- To comply with our legal obligations to carry out identity and anti-money laundering checks
- To comply with the requirements of relevant regulatory bodies eg HMRC, the Financial Conduct Authority (FCA), the Pensions Regulator, the Information Commissioner's Office etc
- To notify you about changes to or features of pension legislation which may be relevant or of interest to you.
- To notify you about other investment products and services that are similar to those you have already purchased, have enquired about or may be appropriate to the circumstances of your pension scheme.

WHO WE SHARE YOUR INFORMATION WITH

In order to provide our services we may share your information with various third parties. These third parties include:

- Your adviser or employer
- Our service providers. These include technology companies providing IT systems and support to us, compliance consultants, payroll providers for pension payments and ID verification service companies.
- Regulatory bodies such as the FCA, the Pensions Regulator, the Information Commissioner's Office
- HM Revenue & Customs (HMRC) eg for the processing of tax relief and regulatory reporting

- Financial institutions and other similar organisations that we deal with in the course of the services we offer
- In the event that we buy or sell any business or assets, in which case we may disclose your personal information to the prospective seller or buyer and their advisers
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity
- Auditors, accountants, legal counsel, contractors or other advisers assisting on any of our business purposes.

We do not provide data to other organisations for the purposes of marketing and will never sell your details to someone else.

WHERE YOUR INFORMATION IS STORED AND PROCESSED

Most of your information is processed in the UK and the European Economic Area (EEA). All the information you provide to us is stored in our office or on back up servers located in the North of England.

Some of the data passed to third parties may be processed outside of the EEA. Where your information is being passed to parties which may process it outside of the UK / EEA we take steps to ensure the same level of protection is applied as if the data was being processed in the UK.

HOW WE PROTECT YOUR INFORMATION

We have put in place security measures against unlawful or unauthorised processing of the information we hold about you, and against the accidental loss or damage to this information

If you have any particular concerns about your information please contact us. See the contact details above.

HOW LONG WE KEEP YOUR INFORMATION

We will keep your data for the whole time you have a pension arrangement with us, or we remain connected to a scheme of which you have been a member.

We will also keep your data after your pension arrangement ceases to exist, for example if you transfer your funds to a pension arrangement with a different provider. This means we will be able to provide information to your new arrangement on the funds transferred to them and also answer any subsequent queries which may arise in connection with these funds at a later date. Our past experience has shown that questions may arise many years after funds have been transferred.

YOUR RIGHTS

You have various rights in relation to the data provided to us. These are as follows:

The right to be informed

You have the right to receive clear information on the personal information we hold on you and who we share it with. This is set out in this Privacy Policy.

The right to request a copy of your information

You can request a copy of the information which we hold on you. This is known as a Subject Access Request (SAR).

If you would like a copy of some or all of your information, please contact us using the details in the Contact Us section above and let us know the specific information you want a copy of.

The right to correct any mistakes in your information

We aim to store your information accurately. If however, any of the information we hold about you is incorrect you can require that we correct this. Please contact us using the details in the Contact Us section above and let us know the information that is incorrect and the information which should replace it.

The right to request we cease processing your information

You may request that we cease processing your information. This means we are still permitted to hold your information but only to ensure we don't use it in the future for those purposes you have restricted.

You should note that in order to comply with regulations it may not be possible to restrict processing whilst you have funds in a pension arrangement with us.

The right to request deletion of your information

You can ask us to erase all of your information (known as the "right to be forgotten") if

- it is no longer necessary for us to hold that Personal Data with respect to the purpose for which it was originally collected or processed;
- you wish to withdraw your consent to us holding and processing your Personal Data;
- you object to us holding and processing your Personal Data (and there is no overriding legitimate interest to allow us to continue doing so);
- the Personal Data has been processed unlawfully; or
- the Personal Data needs to be erased in order for us to comply with a particular legal and/or regulatory obligation.

Unless we have reasonable grounds to refuse to erase your information your request for erasure will be complied with. You should note that whilst there are funds in your pension scheme with us it will not be possible to erase all of your information as it will be needed to administer the scheme.

How to make a complaint

If you are not satisfied with our response to any queries or complaints you raise with us or believe we have not processed your Personal Data in accordance with this policy and the Data Protection legislation you have the right to lodge a complaint at the Information Commissioner's Office (<https://ico.org.uk/>).