



Introducer Privacy Notice

This Introducer Privacy Notice applies to our introducers who submit business under the terms and conditions set out in our Introducer Agreement. It applies regardless of whether you are a former or current introducer.

This Introducer Privacy Notice applies to our website, external communications platforms as well as to our internal processes. It applies to all personal data provided in person, by telephone, email, through the website, social media and by post.

It applies to any data collected from third parties which has been sent to us in our normal day to day operations.

By using our website or accessing any services which we offer including for example, by making an enquiry about our products and service, you agree to be bound by the Introducer Privacy Notice in respect of the information collected about you.

This Introducer Privacy Notice replaces existing terms governing data protection currently in place between Pensionhelp Limited and our Introducers. It explains why we collect personal data, what personal data we collect and how we use it. Your rights in respect of your data are also explained.

If you are part of a network, you undertake to notify your network of this Introducer Privacy Notice. If you are a network, you should undertake to provide each firm within your network with a copy.

Client Personal Data

For the purposes of the General Data Protection Regulation 2018 Pensionhelp Limited act as Data Controller and Data Processor of any personal data which you may provide to us or which we may collect from third parties about you and/or which we may collect when you access our website. It is the responsibility of Data Controllers to explain their data processing activities to affected individuals. This Notice provides information regarding our data processing activities, as both controller and processor

For the purposes of the General Data Protection Regulation 2018 both Pensionhelp Limited and you are data controllers of personal data we process in relation to new and existing clients. When we refer to clients, we mean data subjects who are clients of both Pensionhelp Limited and you (as an introducer), whose personal data is processed by one or both of us. You agree to comply with GDPR legislation and you and Pensionhelp Limited are independently responsible for ensuring compliance for our mutual clients. Pensionhelp Limited will process client data in

accordance with our Introducer Privacy Notice which is available at www.pensionhelp.co.uk. By agreeing to become an introducer you agree that when you supply us with client personal data you are confirming that you have obtained all necessary consents from the client and issued them with details of your own fair processing notice. Pensionhelp Limited require that prospective clients sign a copy of our Customer Privacy Notice before we can proceed with the introduction.

You may only access the personal data relating to your clients and only in respect of the business that you are responsible for servicing.

In the event either you or we become aware of a client complaint concerning the way the client's personal data is processed or a request to exercise any of their rights as a data subject, which is likely to impact on the other party, you or we shall notify each other without undue delay and shall co-operate and provide reasonable assistance to respond to and resolve any such complaint or request.

Your Personal Data

We need to collect personal data about you and maybe individuals associated or employed by you throughout the course of our business relationship with you. You undertake to ensure you provide any such associated or employed person that becomes our data subject with a copy of this notice.

We collect personal data including: name, date of birth, address, gender, job title, firm name, regulatory status, FCA individual registration number, bank details, email address, directorship search. We usually collect this information when you register with us and during the course of our business but also from third parties, such as Companies House, FCA, product providers, credit reference agencies and antifraud agencies.

We record and monitor telephone calls for quality control and regulatory purposes.

We use your personal data to:

- Perform our contractual obligations, to confirm your identity, process your registration, administer business you submit, make payments, communicate with you, develop our business relationship with you, liaise with product providers.

- Comply with our legal obligations, by maintaining records for our regulator, Information Commissioners Office, HMRC, to reply to complaints, data subject requests, to investigate, prevent or detect crime.

- Where it is necessary for our legitimate interests (or those of a third party) provided your interest and fundamental rights do not override those interests including: to exercise our rights; to prevent, investigate and detect fraud; to carry out fraud, credit and anti-money laundering checks; to respond to enquiries and complaints from you and/ or client(s); to provide management information for business monitoring; to maintain our business records; to manage our financial position and business capability; to obtain professional advice; for accounting and auditing purposes, and for marketing research and statistical purposes. We may process your personal data without your knowledge or consent where this is required or permitted by law.

In the unlikely event we need your consent to process personal data, for example to process sensitive personal data (e.g. information about health) or criminal offences or proceedings, we will tell you. In limited circumstances this type of personal data may need to be processed where we need to carry out our legal obligations, where it is in the public interest (e.g. for prevention and detection of unlawful acts or preventing fraud), in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. If you provide sensitive personal data and/or information relating to criminal offences or proceedings on behalf of your clients or another third party, we will ask you to confirm that the third party has provided his or her consent for you to act on their behalf.

Sharing your data

We may share your personal data with third party service providers, not limited to IT and back office administration providers, banks, professional advisers, printers, third party providers such as insurers.

Where we are under a legal duty we may share your personal data with HMRC and other tax authorities, the Regulator, the Financial or Pensions Ombudsman service, the Department of Work and Pensions, the courts, the police and other law enforcement agencies.

We will share your personal data for our legitimate interests as part of our regular reporting activities on company performance, for business development and trend analysis purposes, for fraud detection and prevention, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal data with other third parties in the context of the possible sale or restructuring of the business.

Transferring your data

Your personal data may be transferred to or accessed from other countries (including those outside the European Economic Area). Such information could be accessed by local law enforcement agencies and other authorities to prevent and detect crime and comply with legal obligations. For further details, as to where your personal information is transferred, please contact the Data Controller.

Storing your data

We will hold your personal data securely and will keep your personal data for as long as we have a business relationship with you. Thereafter we may keep your data indefinitely for regulatory or legal reasons.

Your rights

You can request access to, correction or erasure of, and restriction of processing of, your personal data; object to the processing of your personal data and request the transfer of your personal data to another party. You can withdraw consent to our processing of your personal data in the unlikely event we requested your consent (e.g. to process sensitive personal data). There may be occasions where we cannot comply with a request and we will tell you if this is the case and give our reasons. In some cases, we may have to stop paying you.

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

The Data Controller
Lloyds House
18-22 Lloyd Street
Manchester
M2 5WA

You should also make contact with us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the Information Commissioner's Office (ICO), who can be contacted through their website at <https://ico.org.uk/global/contact-us/> or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Company Information

We are Pensionhelp Limited. We are registered in England and Wales under company number 09437056 and have our registered office at Lloyds House, 18-22 Lloyd Street, Manchester, M2 5WA, Authorised and Regulated by the Financial Conduct Authority (Firm Reference Number: 754665)

Cookies

To find out more about how we use cookies please see our cookie policy at www.pensionhelp.co.uk