

## Your privacy is important to us

We are committed to protecting and respecting your privacy and this policy (together with our Terms and Conditions and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This Privacy Policy applies to the following three companies which are collectively referred to as "InvestAcc", "we" or "us":

InvestAcc Pension Administration Limited (Company number 07118349) provides pension scheme administration services to new and existing SIPP and SSAS scheme customers.

InvestAcc Pension Trustees Limited (Company number 02875892) provides professional trustee and pension scheme administration services to new and existing SIPP and SSAS customers.

InvestAcc Limited (Company number 02719226) provides professional trustee and pension scheme administration services to a small number of established SIPP and SSAS customers.

Your personal data is held and processed by InvestAcc in accordance with the Data Protection Act 2018 (**DDPA 2018**) and the EU's General Data Protection Regulation 2018 (**GDPR**). For the purposes of all these regulations and legislation InvestAcc is the Data Controller.

## Information we may collect about you

We may collect and process the following data about you:

Information that you provide to us by filling in forms on our website or that you e-mail to us. For example, your name, date of birth, address, gender etc. This includes information provided when you subscribe and/or register for any service that we may provide via our site from time to time or when you report a problem with our site.

If you contact us, we may keep a record of that, including letters you send to us and meeting notes. If you visit one of our offices we may also collect visual images via closed circuit television (CCTV). We record all inbound and outbound telephone conversations for training purposes, to comply with legal obligations applicable to us (e.g. rules laid down by the Financial Conduct Authority) and to enable conversations to be retrieved and considered in support of any investigation we may undertake in answer to a claim or complaint against InvestAcc. We will not share recorded telephone conversations with other parties unless in the defence of a claim or complaint.

We may collect information you provide us with regarding beneficiaries for pension products you have with us. We may also collect information on children where a parent or guardian acts on their behalf in relation to a product with us, or where they have been named as a beneficiary.

We may also ask you to complete surveys that we use for research purposes, where you have not opted out of receiving such surveys, although you do not have to respond to them.

Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access. This information does not identify you as an individual.

The information we collect about you is not publicly accessible data. If we did not have this information, you (or your family) may not receive the benefits to which you are entitled under schemes provided by InvestAcc.

## IP Addresses, Cookies and Web Beacons

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to improve the structure and content of our site and to report aggregate information to regulators and our members, as requested and appropriate. This is statistical data about our users' browsing actions and patterns, it does not identify any individual.

For these reasons we reserve the right to use cookies as an anonymous method of recording your usage of our site and would ask that if you do not wish to have cookies recorded on your machine, you amend the settings on your browser to prevent them from being created. The "Help" section in your browser should provide you with the necessary information to adjust your settings and control the creation and storage of cookies on your hard drive.

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. Cookies can help a website to arrange content to match your preferred interests more quickly. Most major websites use cookies. Cookies cannot be used by themselves to identify you and we do not use cookies on our website to modify prices or services specific to you. We use them to understand how the website is being used so that we can make improvements.

A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. Two types of cookies are used by us on our site:

- Session Cookies: which are temporary cookies that remain in the cookie file of your browser until you leave the site; and
- Persistent cookies: which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

Session Cookies allow you to carry information across pages of our site and avoid having to re-enter information and to allow you to access stored information.

Persistent Cookies help us recognise you as a unique visitor (just a number) when you return to our website and to allow us to assess and understand our content, which pages are being visited and how long visitors spend on each page.

We specifically use Google Analytics for this. To opt out of being tracked by Google Analytics across all websites visit:

<http://tools.google.com/dlpage/gaoptout>

If you alter your browser settings to refuse our cookies you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. Please note that third parties may also use cookies, over which we have no control.

Our website may contain electronic images known as web beacons which allows us to count users who have visited those pages. Web beacons are not used to access your personally identifiable information on our site. They are a technique to compile aggregated statistics about our website's usage. Web beacons collect only a limited set of information including a cookie number, time and date of a page view and a description of the page on which the web beacon resides.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

## Where we store your personal data

The data that we collect from you will not be transferred to, and stored at, a destination outside the European Economic Area (“EEA”).

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Uses made of the information

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- Where you have consented to be contacted for such purposes, to provide you with information or services that you request from us or which we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us.
- For the legitimate interests pursued by InvestAcc (e.g. for the effective running of pension schemes provided by InvestAcc), or where InvestAcc has a legal obligation to do so.
- To promote and allow you to participate in any events or features which may offer on our site from time to time, when you choose to do so.
- To notify you about changes to our service.

You have the right to object to InvestAcc using your information in this way. However, in some circumstances, your objection may be refused where InvestAcc has compelling reasons to continue to process your personal information (e.g. to comply with the law).

## Disclosure of your information

We would only disclose your personal information to third parties:

- If you have given your consent for us to do so for marketing or other specified purposes.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights or property and the safety of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.

## Marketing and your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by refusing your consent at the time of collection or at any other time by contacting us at [privacy@investacc.co.uk](mailto:privacy@investacc.co.uk)

Our site may, from time to time, contain links to and from the websites of our members, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on our website.

## Access to retention and deletion of information

The GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with the GDPR and we have 1 month from receipt of your request to respond. You also have the right to ask us to erase, amend or limit the use of the data we hold about you and to object to InvestAcc processing your personal information. If there is a legitimate and permissible reason why we cannot do this we will explain why.

We have a retention policy which means we do not keep information we hold about you for longer than necessary unless we there is a legal obligation to do so. Where you are a member (or beneficiary) of a pension scheme managed by InvestAcc, our current data protection policy is that we may retain your personal information for a minimum of 8 years after you or any beneficiary claiming under you has obtained their full benefits from the scheme.

## Making a complaint

If for any reason you are not satisfied with our response, you can complain to the supervisory authority for data protection.

In the UK this is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 0303 123 1113

## Terms and Conditions

Please refer to our [website](#) for our latest Terms and Conditions.

## Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: [privacy@investacc.co.uk](mailto:privacy@investacc.co.uk)

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Version 1.2 (13 December 2018)

InvestAcc, Minerva House, Port Road Business Park, Carlisle, CA2 7AF.  
InvestAcc Pension Administration Limited and InvestAcc Limited  
are both Regulated and authorised by the Financial Conduct Authority.

[www.investaccpensions.co.uk](http://www.investaccpensions.co.uk)