

Data Privacy Statement (March 2018)

It is important that you understand how the personal information you give to us will be used. Therefore, please read this Privacy Statement before proceeding further with your visit to our website or with any business that you may wish us to transact.

This Privacy Statement sets out the obligations of ‘the Companies’ being

Pension Management Limited (03582282)
PML Financial Services Limited (05342018)
PML Trustees Limited (05726389)

In relation to

- (1) our clients, who’s personal data we use in the conduct and administration of our business with them and
- (2) all visitors to this website.

Contact details are

The School House, St Michaels Road, Sutton Coldfield, West Midlands B73 5SY

T: 0121 693 0690
E: info@pmlgroup.uk.com

Our Data Protection Officer can be contacted at:

dataprotection@pmlgroup.uk.com

General Data Protection Regulations (GDPR)

To enable us to fulfil our contracted Services with you, we must secure, use and protect the personal information you give us. Furthermore, we must have “proper reason” for securing this personal information. Proper reasons include:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it

What are your rights?

Your rights under GDPR include:

1. The right to be informed of the collection and use of personal data.
2. The right to access the personal data we hold on you
3. The right to correct and update the personal data we hold on you
4. The right to have your personal data erased, unless it must necessarily be retained by ourselves for legal, regulatory or compliance purposes.
5. The right to restrict processing of your personal data
6. The right to data portability
7. The right to object to the processing of personal data to which consent was sought.

To lodge a complaint with the Information Commissioner's Office you can email them via: <https://ico.org.uk/global/contact-us/email/>, call them on 0303 123 1113,

or write to them at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

We will only collect basic personal data about you, which does not include any 'special category data' unless agreed with you otherwise. This basic personal information may include: your name, address, email address and job title.

We may be required to collect and retain '*special category data*'.

This is defined as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation, data relating to criminal convictions and offences.

Where this applies, all special category data provided by you is subject to your **explicit** consent. The data is retained exclusively within the Companies protected internal database, accessible only to appointed staff of the Company and subject to codes and passwords known only to those staff members. There is no access to the internal database of the Companies through our website.

If at any point you believe the information we process on you is incorrect you can request to see this information and have it corrected or in appropriate circumstances, deleted.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer, at dataprotection@pmlgroup.uk.com, who will investigate the matter and respond to you accordingly. If you are not satisfied with our response or believe we are not processing your personal data in accordance with the requirements of GDPR, then you are within your rights to lodge a complaint with the Information Commissioner's Office (ICO).

Our Data Collection

We need to know basic personal data, including: your name, address, email address and job title, before we can consider contracting to work for you or your company under our standard Terms of Business. The nature of the services we provide will regularly require us to request detailed personal information and 'sensitive personal data' from you. The information required to enable us to provide contracted services to you **may** include:

- Full I.D., including Passport, Driving Licence, Birth Certificate, Marriage Certificate and documents confirming current place of residence, together with full contact details, telephone numbers and email addresses.
- Your financial position, status and history, including taxable income, pension details or entitlements, your tax code and N.I. number.
- Details of your employment or profession and full information of any ownership or control in any partnership or corporate entity with which you may be associated.
- Details of your family and other relationships.
- Details about you that is openly available in public records, such as Electoral Register, Companies House and on the Internet.
- 'Special category data' as defined above.

If you do not provide the information we ask for, then it is most likely that we will be unable to provide the services you have requested. We will not collect any personal data from you that we do not need in order to provide and oversee the services we have agreed to provide to you.

Use of Data

All the personal data we hold about you will be processed by our staff. No third parties will have access to your personal data unless there is a legal obligation for us to provide them with this. We have set out below the legal bases for the Companies to process your data. Our authorised marketing agency has access to the data, for the sole purpose of approved and compliant marketing activities, as instructed by the Companies, including the sending of marketing e-mails. They too are covered by the requirements of GDPR and will not use or share this data with any other party.

We will also communicate with you information about other services we can offer you and update you about our activities.

Where your information is used other than in accordance with one of these uses, we will first obtain your consent to that use. We take all reasonable steps to ensure that your personal data is processed securely.

How long do we keep data?

Typically, we keep your personal data for a minimum of 7 years, after which time it will be destroyed if it is no longer required for the lawful and compliant purpose for which it was obtained. If you consent to marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information.

Sharing your personal data

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your prior consent. It is likely that we will need to share your data with:

- Any members of staff of the Companies
- Our suppliers and contractors. For example, we may ask a supplier to send out newsletters on our behalf, or to maintain our database software, or to provide us with IT and other related services;

Organisations with which we may share your personal information, subject to your agreement, within the provision of our service to you, include:

- Banks or other deposit-taking institution.
- Your appointed Agent or Independent Financial Advisers.
- Insurance Companies and/or Investment Managers
- Price comparison websites, should you require us to apply for relevant financial products.
- HMRC, the Financial Conduct Authority (FCA) or other regulator.
- Any party linked with you or your business in respect of a service you may ask us to provide.

Any personal data transferred to countries or territories outside the European Union will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

Our Privacy Practices

The Companies use fair information practices that are designed to protect your privacy. If you have questions or you do not feel that your concerns have been addressed in our Privacy Statement, or you just want to talk with us, please feel free to contact us by email at dataprotection@pmlgroup.uk.com

Data Collection

We collect information that is voluntarily provided by visitors to this Site. The data that the Companies receive from visitors to this site includes: name, title, address, email address and telephone number, and any other information provided by visitors in email messages and attachments.

Typically, this data is collected in order to assist visitors to:

- receive information about our Companies and the services we offer
- read our bulletins, technical updates and related business matters
- contact us for further information

It is the policy of the Companies to limit the information collected to the bare minimum required to complete a Site visitor's request.

It is the intention to not seek any *special category data* through our website, unless legally required for legal, regulatory or compliance purposes.

Use of User Data

User Data obtained by this website is used for the Companies internal business purposes and in relation to a visitor's request. This data is not shared with others for unrelated purposes unless stated in this Privacy Statement or otherwise communicated to the visitor to the website.

The Companies' make every practical effort to avoid excessive or irrelevant collection of data. If a visitor believes the website has collected excessive information, please contact us at dataprotection@pmlgroup.uk.com

Except for instances where visitors explicitly choose to receive specific PML Group marketing or other informational materials, the Companies will not use personal data collected from our website to distribute marketing or informational materials.

Third Parties

It is the policy of the Companies only to disclose User Data to third parties under the following circumstances:

- when explicitly requested by the visitor
- when required to deliver publications or reference materials requested by the visitor
- when required to meet any other request of a visitor.

Categories of third parties that the Companies may share personally identifiable information with include National, Regional and local government entities. This Site does not collect or compile personally identifying information for the dissemination of or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

Use of Cookies

A cookie is a tiny element of data that a website can send to the computer browser of a visitor, so that this computer will be recognised by the site on their return. Cookies allow our web server to recognise a computer on connection to the Site, which in turn allows the server to make downloading of pages faster than on first viewing. In addition, cookies may also be used by us to establish statistics about the use of the Site by Internet users by gathering and analysing data such as: most visited pages, time spent by users on each page, site performance, etc. By collecting and using such data our aim is to improve the quality of the Site.

The data collected by our servers and/or through cookies that may be placed on your computer will not be kept for longer than is necessary to fulfil the purposes mentioned above. In any event, such information may not be kept for longer than one year.

Navigation data about site viewers is automatically collected by our servers. If you do not wish to have this navigation data collected, we recommend that you do not use the Site. A visitor can also set their browser to block the recording of cookies on their hard drive to minimise the amount of data that may be collected about your navigating on the Site. The browser on a computer can be set to notify the user when a cookie is being recorded on their computer's hard drive. Most browsers can also be set to keep cookies from being recorded on their computer. However, for optimal use of the Site, we recommend that visitors do not block the recording of cookies on their computer.

The 'Companies' servers and computer systems are protected from outside intrusions. As a result, all data that may be collected about Site viewers through the use of cookies will be protected from unauthorised access.

Cookies used on the Site are only active for the duration of the visit. Cookies used on this site are not stored on a visitor's computer once you have closed your web browser. Information generated by the use of cookies may be compiled into an aggregate form so that no individual can be identified.

We may at some stage use cookies to identify users when they visit the Site to use personalised services. In such circumstances these cookies may be kept on the hard drive of their computer following closure of the web browser. Cookies used in connection with such services enable us to build up a profile of our users and to develop personalised versions of the Site.

For more information about cookies, please see the Information Commissioner's website at

<https://icosearch.ico.org.uk/s/search.html?query=cookies&collection=ico-meta&profile= default>

A visitor may choose to not receive a cookie file by enabling your web browser to refuse cookies. The procedure for refusal of cookies may vary for different software products. Please check with your internet browser software help or your software supplier if you wish to refuse cookies.

Transfer of User Data outside the User Jurisdiction

The Internet is a global environment. We do not operate outside the UK and have no need to process User Data outside the UK.

Third-party Links

There are several places throughout this Site that may link to other websites that do not operate under our privacy practices. When visitors link to other websites, our privacy practices no longer apply. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

Choices

Visitors to our website are not required to register to gain access. Personally identifiable information provided to us through our website is provided voluntarily by visitors. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide instructions on the appropriate website area or in communications to our visitors; or a visitor may contact us at dataprotection@pmlgroup.uk.com

Access

Each visitor has the right of access to personal data they have submitted through this Site.

User updates of information should be handled by going back through the registration process. Enquiries about the accuracy of identifying information previously submitted, or requests to have information removed, should be directed to dataprotection@pmlgroup.uk.com

Security

All members of staff of the Companies are instructed to follow a firm-wide security policy. Only authorised personnel are provided access to personally-identifiable information and these employees are required to agree to ensure confidentiality of this information.

Modifications

The Companies reserve the right to modify or amend this statement at any time. The effective date will be displayed at the beginning of this statement. To keep visitors informed, we will notify users of material changes to our Privacy Statement by prominently identifying a link on our website home page to the updated Privacy Policy.

Consent

By continuing to use the Site and by providing any personal data to us via the Site or email addresses provided on the Site, visitors are consenting to our use of your personal data as set out in this Privacy Policy. Please do not send us any personal data if you do not want that information to be used by us in this manner.

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