

Privacy Notice

Why should you read this document?

During the course of dealing with us for the **snapshot** pensions service, we will ask you to provide us with personal information relating to your existing circumstances and pension plans (**Your Personal Data**). This document is important as it allows us to explain to you what we will need to do with Your Personal Data, and the various rights you have in relation to it.

What do we mean by “Your Personal Data”?

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, national insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, or any other information that could be associated with your cultural or social identity.

In the context of providing you with assistance in relation to your pension plans, your Personal Data may include:

- Title, name, date of birth, gender, contact details, addresses and documents that are necessary to verify your identity
- Employment information, past and present
- Any pre-existing pension products and the terms and conditions relating to these

The basis upon which our firm will deal with Your Personal Data

When we correspond with you about your pension plans, we do so on the basis that both parties are entering a contract for the supply of services.

In order to perform that contract, we have the right to use Your Personal Data for the purposes detailed below. Alternatively, either in the course of corresponding with you or when the contract between us has come to an end for whatever reason, we have the right to use Your Personal Data provided it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from pension providers and our Compliance Service Provider relating to the information we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

How do we collect Your Personal Data?

We will collect and record Your Personal Data from a variety of sources, but mainly directly from you. You will provide information via the **snapshot** mandate or may opt to contact us by email or

post. If we have any queries regarding the data you submit, we may need to contact you to reconcile this. You may therefore provide information to us verbally and in writing, including email, as well as via the **snapshot** website - www.snapshotpensions.co.uk

We will also obtain some information from third parties, for example your past and present pension providers. We will not ask your pension providers for any information other than the key plan details required in order to complete your Snapshot report. We cannot however exclude the possibility that they may send us additional information about you or your plan.

What happens to Your Personal Data when it is disclosed to us?

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data on our computer systems (*websites, email, hard drives, and cloud facilities*). This information can only be accessed by employees and consultants within our firm and only when it is necessary to provide our service to you and to perform any administration tasks associated with or incidental to that service.
- Submit Your Personal Data to Product providers both in paper form and on-line via a secure portal. The provision of this information to a third party is essential in allowing us to provide the **snapshot** pensions service.
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to the Snapshot service, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Pension Providers
- Third parties who we believe are able to support your needs as identified. These third parties will include but may not be limited to, our compliance advisers and product specialists, (in each case where we believe this to be required due to your particular circumstances).

In each case, Your Personal Data will only be shared for the purposes set out in this Customer Privacy Notice, i.e. to progress your pension enquiry and to provide you with our professional services.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for a minimum period of 6 years following the advice/service you receive from us, although your data could be held for a longer period where this may be needed to meet the requirements of our regulatory bodies.

Your rights in relation to Your Personal Data

You can:

- Request copies of Your Personal Data that is under our control
- Ask us to further explain how we use Your Personal Data
- Ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request)
- Ask us to send an electronic copy of Your Personal Data to another organisation should you wish
- Change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety)

How to make contact with our Firm in relation to the use of Your Personal Data

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:

Jason Hemmings
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Exchange Tower
19 Canning Street
Edinburgh
EH3 8EH
jhemmings@cornerstoneam.co.uk

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

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 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.

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