

Sovereign Pensions Services Gibraltar Limited Privacy Notice for provision of trust-based pension administration services to occupational and personal pension schemes

1. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide trust-based pension administration services to occupational and personal pension scheme to you. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

2. What Personal Data is

'Personal Data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

'Special category data' is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

'Criminal offence data' refers to personal data relating to criminal convictions and offences or related security measures. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations and proceedings.

3. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide trust-based pension administration services to occupational and personal pension schemes. The type of Personal Data we collect is outlined in the table below in the section entitled 'Purposes, lawful bases and retention periods'.

4. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website.

We may also need to collect Personal Data from third parties such as:

- Employers
- Independent Financial Advisors
- Investment Houses

- Publicly available sources such as Companies House and WorldCheck.

5. Cookies

A cookie is a small text file which is placed onto your device (e.g computer, smartphone or other electronic device) when you use our website.

Our website uses cookies. For further information about cookies and how we use them, please see our [Cookie Notice](#).

6. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Member	Name, address, email address, telephone number, marital status, date of birth	To complete the application for the pension scheme.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Member.	6 years following the date of the last transaction
Beneficiaries	Beneficiary details (name, address, telephone number)	To be able to pay any benefits payable to beneficiaries.	Legal obligation. This includes where Sovereign is required, permitted or authorised to process this personal data based on a legal obligation, including applicable laws relating to employment, pensions, tax and reporting to or responding to requests from regulators.	6 years following the date of the last transaction
Member	Relevant current/historic employment information (which may include payroll number, current and past salary information and employment dates.	To calculate and pay Member contributions or benefits.	Legal obligation. This includes where Sovereign is required, permitted or authorised to process this personal data based on a legal obligation, including applicable laws relating to employment, pensions, tax and reporting to or	6 years following date of member leaving scheme.



			responding to requests from regulators.	
Member	Medical reports	To review a Member's claim for serious ill health benefits or enhanced benefits. Third party actuarial support is likely to be involved.	Explicit Consent	6 years following date of member leaving scheme.
Member	Bank details	To make payment of pension benefits.	Contract. The processing is necessary to perform the agreement(s) to provide services to the Member.	6 years following date of member leaving scheme
Member	Name, job title, work email address, work phone number, company you work for	To send you newsletters and other promotional material.	Consent	2 years following last meaningful contact
Member	Date of birth, place of birth, passport number, names of beneficiaries, residential address, tax ID number, policy number, source of funds, current financial advisor (5 of these will be requested)	To conduct and record security calls with members in specified circumstances (relating to payments and dealing instructions) for security purposes and to prevent fraud.	Consent	6 years following date of member leaving scheme



Member	Name, address, date of birth, passport, ID card	To conduct due diligence (background checks) which may reveal information about criminal convictions or offences. This ensures that we can comply with our legal and regulatory obligations.	The processing is necessary for reasons of substantial public interest, on the basis of applicable law (including laws designed to combat money laundering, bribery and corruption and avoidance of sanctions.	6 years after last meaningful contact
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Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

7. Marketing

We would like to send you information about our products and services, events and news, which may be of interest to you. Where we have your consent or it is in our legitimate interest to do so, we may do this by email.

You can unsubscribe at any time by:

- contacting us at marketing@sovereigngroup.com
- using the 'unsubscribe' link in emails.

You also have the right to object to your personal data being used for direct marketing purposes at any time.

For more information on how we use your personal data for marketing purpose, please see our [Marketing Privacy Notice](#).

8. Sharing your Personal Data

In the course of providing you with this product/service – we may need to share your Personal Data with the following third parties:

Actuaries
Employers
Independent Financial Advisors
Investment Houses
Outsourced Partners (including Sovereign's Mauritius Shared Service Centre & Baker Tilly Isle of Man)
Sovereign Wealth (where agreement in place with the Principal Employer)
Regulatory Authorities (Commissioner of Income Tax and Gibraltar Financial Services Commission, HMRC)

9. Retention

We will retain your personal data whilst it is required for the relevant purposes or to meet legal requirements.

10. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

We may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

These standards include Standard Contractual Clauses ("SCCs") approved by the Information Commissioner. In Gibraltar, they are the International Data Transfer Agreement and the International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers which can be relied upon to comply with Gibraltar's data protection regime.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

11. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.
- **Right to portability**
You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint**
You have the right to lodge a complaint with the relevant supervisory authority if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in Gibraltar is the Gibraltar Regulatory Authority who can be contacted online at:
Gibraltar Regulatory Authority
2nd floor

Eurotowers 4
1 Europort Road
Gibraltar GX11 1AA
Tel: (+350) 200 74636
Email: info@gra.gi

How to exercise your rights

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

12. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Data Protection Officer as follows:

Sovereign Pension Services (Gibraltar) Limited, Sovereign Place, 117 Main Street, Gibraltar

Email: dpo@sovereigngroup.com

Phone number +350 200 76173

13. Changes to this privacy notice

We keep our privacy notice under regular review to make sure it is up to date and accurate. We will update this notice accordingly on our website.

This Privacy Notice was last updated in May 2024.