

Sovereign Pensions Limited

Privacy Notice for provision of International Pensions, Bespoke Pensions and ROPS Pensions (“the Services”)

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 the Services 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.

This Privacy Notice may be updated and/ or re-issued at any time, and we will provide you with notice of any such updates via either email and/ or Website.

2. What Personal Data is

‘Personal Data’ means any information relating to an identified or identifiable natural person (data subject).

An ‘identifiable living/natural person’ is further defined to mean one who can be identified, directly or indirectly, in particular by reference to:

- an identifier such as a name, an identification number, location data, or an online identifier; or
- one or more factors specific to the physical, psychological, genetic, mental, economic, cultural, or social identity of the natural person.

‘Special Category Personal Data’ are set out in Article 9(1) of the GDPR Order and relates to processing of personal 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.

‘Criminal Offence Personal Data’ are set out in Article 10 of the GDPR Order covers processing in relation to criminal convictions and offences or related security measures. Personal data relating to criminal convictions and offences or related security measures are not included in the special categories.

3. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide the Services. The type of Personal Data we collect is outlined in the table below in the section entitled ‘Purposes, lawful bases and retention periods’.



We will also collect information about criminal convictions or allegations of criminal behaviour where it is appropriate and only where we are legally obligated to do so. This will be achieved by utilizing screening platforms such as World-Check and the internet. We do not collect anything you would not expect us to collect, and we will not collect any personal data we do not need.

4. How we collect your Personal Data

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

However, we may also need to collect Personal Data from third parties such as:

- Introducers
- Intermediaries

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. [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
Client	Name, address, email address and contact details	To provide the requested service	Contract – as our client we have a contractual arrangement with you and to fulfil our obligations we need to process your personal data.	From 6 to 18 years after the relationship has ceased, depending on the status and country of registration of the underlying company
Client	Name, address, email address and contact details	To provide marketing material if you have not opted out	Legitimate interests of the data controller	Until the relationship ends or if the client objects.



Client	Role, gender, marital status, transactions data, bank data and tax data	To provide the requested service	Legal obligation	From 6 to 18 years after the relationship has ceased, depending on the status and country of registration of the underlying company
Client	Source of funds, source of wealth, passport and proof of residential address, bank reference letters business interests,]	To provide the requested service	Legal obligation	From 6 to 18 years after the relationship has ceased, depending on the status and country of registration of the underlying company
Clients	Any Criminal convictions and offences	To provide the requested service	Legal obligation	From 6 to 18 years after the relationship has ceased, depending on the status and country of registration of the underlying company
Client	Health reports from professional doctors or specialises, if claiming pension before due date	To provide the requested service	Legal obligation	From 6 to 18 years after the relationship has ceased, depending on the status and country of registration of the underlying company



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, telephone or social media.

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.

9. 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:

Tax Agents (If necessary)
Regulated Authorities
Any third parties (where necessary)

10. Retention

We will retain your personal data for as long as is necessary to provide the services which you have requested from us.

However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations.

We may also need to retain your personal data for a longer period where this is required in relation to legal claims, although this is rare.

Your personal data is securely stored on our company secretarial database and on paper. We retain your personal data in accordance with the retention periods set out in the table above. We will then dispose of your information by deleting the information on our company secretarial database and paper records will be shredded.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

11. 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 European Commission, which contractually oblige the entities in those countries to operate to the data protection standards expected within the EU/EEA.

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.

12. 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 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 the Isle of Man is The Commissioner who can be contacted online at:

Isle of Man Information Commissioner email: ask@inforights.im or

Isle of Man Information Commissioner,
PO Box 69, Douglas,
Isle of Man,
IM99 1EQ

or by telephone on +44 1624 693260

or in person at

First Floor,
Prospect House,
Prospect Hill,
Douglas,
Isle of Man,
IM1 1ET.

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.

13. 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 House, 4 Christian Road, Douglas, Isle of Man, IM1 2SD

iomdataprotection@sovereigngroup.com

Phone number +1624 699 800

14. 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 August 2024.