

# Data Protection Statement



## Who controls my personal information?

Zurich Assurance Ltd (“**Zurich**”) has appointed Capita Life & Pensions Regulated Services Limited (“**Capita**”) as Scheme Administrator and Operator of the Scheme. Curtis Banks have been sub-contracted by Capita to administer the Scheme.

Zurich and Capita each operate as a data controller in their own right in respect of personal information that is collected and processed in connection with the Scheme.

This data protection statement explains how both Zurich and Capita (referred to throughout as “**we**”, “**us**” and “**our**”) use your personal information to administer the Scheme.



## What personal information will you collect about me?

We will collect personal information that you give us by (phone, letter, email or filling in forms, including on our website). We also collect personal information from your adviser or any investment manager, scheme practitioner, administrator, pension scheme trustees, insurance company or any other pension provider of any scheme, arrangement or contract of which you have ever had any benefit entitlement.

The types of personal information we will collect include: basic personal information (i.e. name, address and date of birth), occupation and financial details and, where you have requested other individuals be included in the arrangement, limited personal information about those individuals. We may process health information in limited circumstances (processing ill health or serious ill health claim), but will always seek your consent prior to receiving any of this information).

If you give us personal information on other individuals, this information will be used to administer your SIPP. You confirm that you have their permission to do so. Except where you are managing the contract on another's behalf, please ensure that the individual knows how their personal information will be used by us. More information about this can be found in the ‘How do you use my personal information’ section.



## How do you use my personal information?

We will only collect and use your personal information:

- where the processing is necessary in connection with providing you with a quotation and/or contract of insurance and/or provision of financial services that you have requested
- to meet our legal or regulatory obligations
- for our “legitimate interests”; or
- insurance purpose.

It is in our legitimate interests to collect your personal information as it provides us with the information that we need to provide our services to you more effectively including providing you with information about our products and services. We will always ensure that we keep the amount of information collected and the extent of any processing to the absolute minimum to meet this legitimate interest.

Examples of the purposes for which we will collect and use your personal information are:

- to administer your SIPP and assess claims
- to obtain feedback on the service we provide to you
- for business analysis purposes; and
- for fraud prevention and detection purposes.

We will contact you to obtain consent prior to processing your personal information for any other purpose, including for the purposes of targeted marketing unless we already have consent to do so.



## Who do you share my personal information with?

In order to provide you with the goods and services you have requested, we will share your personal information with the types of organisations described below:

- your adviser or discretionary fund manager, pension scheme trustees, administrators, practitioners, insurers or pension providers when required to do so
- any necessary third party in connection with administering the Scheme (including Zurich's, the Trustee's or Capita's professional advisers)
- affiliated companies to whom we have subcontracted or delegated the carrying out of functions related to the Scheme administration, including such affiliated companies that are outside the EEA in countries that do not have similar protections in place regarding your personal information and its use.

In order to meet our legal or regulatory requirements, we will share your personal information with the types of organisations described below:

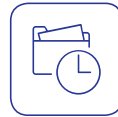
- regulatory and legal bodies
- central government or local councils
- law enforcement bodies, including investigators
- credit reference agencies; and
- other insurance companies.



## How do you transfer my personal information to other countries?

In order to administer the Scheme, Capita may share your information with members of Capita plc, including group members outside the EEA, in countries that may not have the same level of protection for personal data. Capita will make sure that any such group member uses adequate security measures to provide at least the level of protection for personal data that is required under EU data protection legislation.

A copy of our security measures for personal information transfers can be obtained from our Data Protection Officer at: Zurich Insurance Group, Unity Place, 1 Carfax Close, Swindon, SN1 1AP, or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).



## How long do you keep my personal information for?

We will keep and process your personal information for as long as necessary to meet the purposes for which it was originally collected.

There are a number of factors influencing how long we will keep your personal information, and these are shown below:

- to comply with applicable laws and regulations or set out in codes issued by regulatory authorities or professional bodies
- our business processes, associated with the type of product or service that we have provided to you
- the type of data that we hold about you
- if your data relates to any ongoing, pending, threatened, imminent or likely dispute, litigation or investigation
- to enable us to respond to any questions, complaints, claims or potential claims
- if you or a regulatory authority require us to keep your data for a legitimate purpose.



## What are my data protection rights?

You have a number of rights under the data protection laws, namely:

- to access your data (by way of a subject access request)
- to have your data rectified if it is inaccurate or incomplete
- in certain circumstances, to have your data deleted or removed
- in certain circumstances, to restrict the processing of your data
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services
- to object to direct marketing
- not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you
- to claim compensation for damages caused by a breach of the data protection legislation
- if we are processing your personal information with your consent, you have the right to withdraw your consent at any time.

Should you wish to exercise any of your rights please contact us by email on [zurich@curtisbanks.co.uk](mailto:zurich@curtisbanks.co.uk), or write to: 3 Temple Quay, Bristol, BS1 6DZ. You can also contact us by phone on 01382 768030.

You can ask for further information about the use of your personal information or complain about its use in the first instance, by contacting the Data Privacy Officer by email at [privacy@capita.co.uk](mailto:privacy@capita.co.uk), or the Zurich Data Privacy Officer at Zurich Insurance Group, Unity Place, 1 Carfax Close, Swindon, SN1 1AP, or by emailing the Data Protection Officer at [GBZ.General.Data.Protection@uk.zurich.com](mailto:GBZ.General.Data.Protection@uk.zurich.com).

If you have any concerns regarding our processing of your personal information or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is: First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

Capita Life & Pensions Regulated Services Limited is authorised and regulated by the Financial Conduct Authority. Registered in England No. 2424853. Registered Office: First Floor, 2 Kingdom Street, Paddington, London, W2 6BD.

Zurich Assurance Ltd, authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Registered in England and Wales under company number 02456671. Registered Office: Unity Place, 1 Carfax Close, Swindon, SN1 1AP.

