



Brunel Privacy Notice (March 2020)

At Brunel Pension Partnership Ltd (**Brunel**), we are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect will be processed by us. Please read this privacy policy carefully to understand our views and practices and your rights regarding your personal data.

By visiting www.brunelpensionpartnership.org (our public site) your personal information will be processed as described in this policy.

For the purpose of data protection legislation, the data controller is Brunel Pension Partnership Ltd whose registered office is at 101 Victoria Street, Bristol, BS1 6PU.

This policy is overseen by Kevin Jones, who is our Data Protection Officer (**DPO**). If you have any queries, complaints or requests please contact him at kevin.jones@brunelpp.org or 07458 144638.

What information do we collect from you?

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by corresponding with us by phone, email or otherwise. The information you give us may include your name, address, email address and phone number, and professional role;
- **Information we collect from your use of our site.** With regard to each of your visits to our site we will automatically collect technical information, such as what type of device you are using to access our service, the browser, and the time accessed;
- **Information we collect when you call us.** If you call us we will automatically record the following information:
 - the phone number used to call us;
 - a recording of all inbound and outbound calls;
- **Providing us with your details online to sign up for our newsletter.** This is information you may choose to provide us with using the www.brunelpensionpartnership.org/signup page on our site. It includes your name and email address. Please let us know if any of this information changes so we can keep our records up to date. You can unsubscribe at any time.

Why do we collect this information?

We process your personal information for the following reasons:

- Pursuant to a **contract** in order to:
 - process information to take steps to enter into a contract with you or the organisation you represent;
 - exercise our rights and perform our obligations under the contract;
 - process payments;
 - maintain business and service continuity.
- On the basis of your **consent**:
 - where we rely on your consent for processing this will be brought to your attention when the information is collected from you;
 - we will only email you with news alerts if you consent to us doing so and you have the right to withdraw consent at any time. See the **What are your rights?** section below for more information.
- In our **legitimate interests** of providing the best service and improving our business we will process information in order to:
 - improve our products and services;
 - collaborate on industry matters with representatives from other organisations to improve the opportunities and outcomes for our clients;
 - keep our site and systems safe and secure;
 - defend against or exercise legal claims and investigate complaints;

You have the right to object to processing carried out for our legitimate interests. See the **What are your rights?** section below for more information.

- To comply with **legal requirements** relating to:
 - our obligations as a business regulated by the Financial Conduct Authority;
 - anti-money laundering;
 - fraud investigations;
 - any other legal obligations placed on us from time to time.

How long do we keep hold of your information?

We will keep information about you for a maximum of 6 years after the end of our relationship with you, except for the following records which we will keep for 7 years:

- telephone records;
- tax related information;
- information we are required to keep by the Financial Conduct Authority.

Who might we share your information with?

For the purposes set out in the 'Why do we collect this information?' section above, we will share your personal information with the following categories of third parties, some of whom we appoint to provide services, including:

- business partners, subsidiaries, suppliers and sub-contractors for the performance of any contract we enter into with you;
- third parties who assist us with managing the Brunel website.

Additionally, we will disclose your personal information to the relevant third party, if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention of money laundering and credit risk reduction.

How is your data stored and kept secure?

At Brunel, we take your safety and security very seriously and we are committed to protecting your personal and financial information. All information kept by us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We do not transfer your data outside the European Economic Area ("EEA"). If in future we do need to transfer your data outside the EEA, we will only do so if adequate protection measures are in place in compliance with data protection legislation.

What are your rights?

Where processing of your personal data is based on consent, you can withdraw that consent at any time.

You have the following rights. You can exercise these rights at any time by contacting us at info@brunelpp.org. You have the right:

- To ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing;
- to request from us access to personal information held about you;
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask for data to be erased provided that:
 - the personal data is no longer necessary for the purposes for which it was collected;
 - you withdraw consent (if the legal basis for processing is consent);
 - you exercise your right to object, set out below, and there are no overriding legitimate ground for processing;
 - the data is unlawfully processed; or
 - the data needs to be erased to comply with a legal obligation;
- to ask for the processing of that information to be restricted if the accuracy of that data is contested, the processing is unlawful, the personal data is no longer necessary for the purposes for which it was collected, or you exercise your right to object (unless there are legitimate grounds for processing);
- to ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us using the contact details above. In the event that you are not satisfied with our processing of your personal data, you have the right to lodge a complaint with the relevant supervisory authority, which is the Information Commissioner's Office



(ICO) in the UK, at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>.

Changes to our privacy policy

This policy may be updated from time to time. Please check back frequently to see any updates or changes to our privacy policy.

Cookies

We use cookies and similar technology to distinguish you from other users of our site. This helps us to provide you with a good experience when you use our site and also allows us to improve our site.

We use **analytical cookies**. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies.

Contact us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Brunel Pension Partnership Ltd, 101 Victoria St, Bristol, BS1 6PU or email us at info@brunelpp.org.