**CORPORATE PRIVACY NOTICE**

**BLANKSTONE SINGTON LIMITED**

# Introduction

## In this Privacy Notice the terms the **"Company"**, **"we"**, **"us"** and **"our"** are references to Blankstone Sington Limited company number 02378144 having a registered address at Walker House, Exchange Flags, Liverpool, L2 3YL and telephone number 0151 236 8200.

## Blankstone Sington Limited will be the data controller of your personal data.

## We hold and process data for numerous purposes and the means of collection, lawful basis of processing, use, disclosure and retention periods for each purpose will differ depending on our relationship with you.

## We take your data protection rights and our legal obligations seriously. Your personal data will be treated in a secure and confidential manner and only as set out below or otherwise notified to you in writing.

## Please read the following carefully to understand our views and practices regarding your personal data and how we treat it. The following Privacy Notice describes the categories of personal data we may collect and process, how and why your personal data may be processed and how your privacy is safeguarded in the course of our relationship with you. It is intended to comply with our obligations to provide you with information about the Company's processing of your personal data under GDPR and the Data Protection Act. It does not form part of your contract with us.

## If you have any questions about this Privacy Notice or would like to access the information it contains in a different format, or if you believe your privacy rights have been violated or if you are aware of an unauthorised access, use or disclosure of data please contact the Compliance Director on the above contact details.

# What PERSONAL data do we collect, HOW DO WE USE IT AND WHAT LEGAL BASIS DO WE RELY ON

## We collect and use data differently depending on our relationship with you. We set out in the Appendix details of the data we collect, how we collect it, what we use it for and the legal basis we rely on for each different group of data subjects we interact with. Please review the section of the Appendix that relates to our relationship with you for the information that applies to you. Our data subject groups are

* Clients (or contacts at clients where clients are not individuals)
* Potential clients (or contacts at potential clients where clients are not individuals
* Contacts at suppliers
* Shareholders
* Pension members
* Employees, others who work for us and those who used to work for us (please see our separate Employee Privacy Notice)
* Recruitment applicants (please see our separate Recruitment Privacy Notice)
* Visitors to our office
* Visitors to our website

## Whenever the Company processes your personal data we do so on the basis of a legal basis or justification for that processing. Processing of special categories of data is always justified on the basis of an additional lawful condition. In the majority of cases, the processing of your personal data will be justified on one of the following bases:

### The processing is necessary for **compliance with a legal obligation to which the Company is subject**; or

### The processing is necessary for the **performance of a contract** to which you are a party or in order to take **steps at your request prior to entering into such a contract**; or

### We have your informed consent to the particular processing. We will normally rely on this basis for marketing to individuals;

### The processing is necessary for the **legitimate interests pursued by the Company**, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. We will on occasion process your personal data for the purpose of legitimate interests pursued by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

## We have identified a number of purposes for collecting and processing your personal data based on our relationship with you and have set those out below in the relevant section of the Appendix. We have applied the following codes to explain which of the legal bases from section 2.2 above we rely on for each of the purposes we use your data for:

* we use the symbol (LO) to demonstrate reliance by us on **compliance with a legal obligation** (see section 2.2.1 above for more on what this means);
* we use the symbol (C) to demonstrate reliance by us on **performance of your contract** (see section 2.2.2 above for more on what this means); and
* we use the symbol (LI) to demonstrate reliance by us on **legitimate interest** (see section 2.2.3 above for more on what this means).
* We make it clear where we rely on your consent.

In each case in the Appendix we have set out the relevant code or codes next to the purpose below so that you can see which legal basis we rely on. If we rely on more than one basis for all the processing within that area then we have listed all the applicable codes. We only rely on legitimate interest where aspects of the processing go beyond what is necessary for compliance with our legal obligations or what is necessary to perform our contract with you and where we do not have or legally require your consent.

# Retention of personal data

## The Company endeavours to ensure that personal data are kept as current as possible and that irrelevant or excessive data are deleted or de-personalised as soon as reasonably practicable.

## The Company's general approach is to only retain personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you. This will usually be the period of your contract with us plus the length of any applicable statutory limitation period following cessation. We may keep some specific types of data, for example, tax records, for different periods of time, as required by applicable law. However, some personal data may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

## Our retention policy is available from the Compliance Director.

# Disclosures of personal data

## Within the Company, your personal data can be accessed by or may be disclosed internally on a need-to-know basis to:

* management responsible for managing or making decisions in connection with your relationship with the Company or when involved in a process concerning your relationship with the Company (including, without limitation, staff from Compliance, Legal, HR and IT);
* system administrators; and
* where necessary for the performance of specific tasks or system maintenance by staff in the Company.

## In addition, we may share personal data with national, regulatory or public authorities in order to comply with a legal obligation to which we are subject or to make an appropriate disclosure.

# Security of data

## The Company is committed to protecting the security of the personal data you share with us. In support of this commitment, we have implemented appropriate technical, physical and organisational measures to ensure a level of security appropriate to the risk. The Company uses a variety of technical and organisational methods to secure your personal data in accordance with applicable laws.

# INTERNATIONAL Transfer of Personal Data

## From time to time some of your personal data (including special categories of personal data), could be transferred to third parties (e.g. service providers or regulators as set out above), who may have systems or suppliers located outside the European Union. As a result, your personal data would be transferred to countries whose data protection laws may be less stringent than in the UK.

## If this arises the Company will ensure that appropriate or suitable safeguards are in place to protect your personal information and that transfer of your personal information is in compliance with applicable data protection laws. The Company will ensure that any such recipients of your personal data first sign standard contractual clauses as approved by the European Commission or the Information Commissioner's Office (ICO). You can obtain a copy of any standard contractual clauses in place which relate to transfers of your personal data by contacting the Compliance Director.

# Your rights as a data subject

## **Right to access, correct and delete your personal data**

The Company aims to ensure that all personal data are correct. You also have a responsibility to ensure that changes in personal circumstances (for example, change of address and bank accounts) are notified to the Company so that we can ensure that your data is up‑to‑date.

You have the right to request access to any of your personal data that the Company may hold, and to request correction of any inaccurate data relating to you. You furthermore have the right to request deletion of any irrelevant data we hold about you.

## **Data portability**

Where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal data is processed by automatic means, you have the right to receive all such personal data which you have provided to the Company in a structured, commonly used and machine‑readable format, and also to require us to transmit it to another controller where this is technically feasible.

## **Right to restriction of processing**

You have the right to restrict our processing of your personal data where:

* you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
* where the processing is unlawful but you do not want us to erase the data;
* where we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; or
* where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether the Company has compelling legitimate grounds to continue processing.

Where personal data is subjected to restriction in this way we will only process it with your consent or for the establishment, exercise or defence of legal claims.

## **Right to withdraw consent**

Where we have relied on your consent to process particular information you have the right to withdraw such consent at any time. You can do this by (i) in some cases unsubscribing from emails (although note that in this case it may remain in back‑ups and linked systems until it is deleted in accordance with our data retention policy) or (ii) contacting the Compliance Director.

## **Right to object to processing justified on legitimate interest grounds**

Where we are relying upon legitimate interest to process data, then you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where we need to process the data for the establishment, exercise or defence of legal claims. Where we rely upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

## **Right to complain**

You also have the right to lodge a complaint with the ICO if you consider that the processing of your personal data infringes applicable law (https://ico.org.uk).

## For further information regarding your rights, or to exercise any of your rights, please contact the Compliance Director.

# Additional Privacy Notices

We may undertake certain processing of personal data which are subject to additional Privacy Notices and we shall bring these to your attention where they engage.

# Notice of changes

## The Company may change or update this Privacy Notice at any time.

## Should we change our approach to data protection, you will be informed of these changes or made aware that we have updated the Privacy Notice so that you know which information we process and how we use this information.

## This Privacy Notice was last updated and reviewed on 31 January 2020.

**APPENDIX**

**Clients**

# What personal data do we collect and process?

## We will collect various types of personal data about you for the purposes described in this Privacy Notice including:

* **Personal details:** your title, name(s), gender, nationality, civil/marital status, date of birth, age, home contact details (e.g. address, telephone or mobile number, e‑mail), national insurance number, occupation, family, bank account details, risk profile;
* **Financial data:** income and expenditure, assets and liabilities;
* **Proof of identity:** documents containing photographs (e.g. passport or driving licence), bank statements, utility bills;
* Any other personal data which you choose to disclose to Company personnel during the course of our relationship with you;
* Informal opinion data generated in the course of our relationship with you relating to the administration or management of your account;

## Special categories of data may be collected and processed by the Company for the following purposes:

* **Health and medical information** may be used with your consent to tailor our services to ensure that your interests are protected or in the event that we need to make reasonable adjustments to accommodate any needs you have in the event that you have a disability if you choose to provide us with this information.

## Apart from personal data relating to you, you will also provide the Company with personal data of third parties, notably your dependants and other family members, for purposes of management of your investment account. Before you provide such third party personal data to the Company you must first inform these third parties of any such data which you intend to provide to the Company and of the processing to be carried out by the Company, as detailed in this Privacy Notice.

# How does the company collect data?

## You will usually provide this information directly to the Company (for example, through your completion of our account opening questionnaire, our regular requests for updates to the information held, meetings and telephone conversations, letters and emails).

## Where authorised by you we may also obtain some information from third parties: for example, your accountant, solicitor or financial adviser.

# What are the purposes for which data is processed and what is our legal basis for carrying out the processing?

We collect and process your personal data for purposes including:

* **providing investment services** (C), (LI) - to assess your investment requirements and provide investment services that meet those requirements in line with your requirements and our contract with you including, but not limited to, the provision of our online services in accordance with our Client Online Portal Service Terms and Conditions;
* **identifying clients** including for anti-money laundering compliance and security (LO) (C), (LI);
* **administering our contract with clients -** administering all aspects of our contract with you including our charges and client relationship management (C);
* **outsourcing selected functions to third parties** (C), (LI) – for example vendors of hosted software solutions or cloud storage providers;
* **communicating with clients** (LO), (C);
* **legal and regulatory compliance** (LO), (LI) - complying with the Company's regulatory obligations (e.g. if we suspect fraud or money laundering or reporting to HM Revenue and Customs);
* **litigation** (LO), (C), (LI) - to enforce our legal rights and comply with our obligations, and for any necessary purposes in connection with any legal claims made by, against or otherwise involving you;
* **legal or regulatory disclosures** (LO), (LI) to comply with lawful requests by public or regulatory authorities or other third parties, court or discovery orders, or where otherwise required or permitted by applicable laws

## we use your data to tell you about other products and services we offer if you have agreed to this by ticking the relevant boxes in the section of the client agreement headed ‘information about other services and products we offer’.

**POTENTIAL CLIENTS**

# What personal data do we collect and process?

## We will collect various types of personal data about you for the purposes described in this Privacy Notice including:

* **Personal details:** your title, name(s), gender, nationality, civil/marital status, date of birth, age, home contact details (e.g. address, telephone or mobile number, e‑mail), occupation, family;
* **Financial data:** income and expenditure, assets and income;
* Any other personal data which you choose to disclose to Company personnel during the course of our discussions with you;

## Certain additional information will be collected where this is necessary and permitted by local applicable laws and we will let you know if this arises.

## Special categories of data may be collected and processed by the Company for the following purposes:

* **Health and medical information** may be used to tailor our services to ensure that your interests are protected or in the event that we need to make reasonable adjustments to accommodate any needs you have in the event that you have a disability if you choose to provide us with this information.

## Apart from personal data relating to you, you will also provide the Company with personal data of third parties, notably your dependants and other family members, for purposes of management of your investment account. Before you provide such third party personal data to the Company you must first inform these third parties of any such data which you intend to provide to the Company and of the processing to be carried out by the Company, as detailed in this Privacy Notice.

# How does the company collect data?

## You will usually provide this information directly to the Company (for example, through your completion of our account opening questionnaire, meetings and telephone conversations, letters and emails).

## Where authorised by you we may also obtain some information from third parties: for example, your accountant, solicitor or financial adviser.

# What are the purposes for which data is processed and what is our legal basis for carrying out the processing?

We collect and process your personal data for purposes including:

* **providing investment services** (C), (LI) - to assess your investment requirements and determine the investment services that meet those requirements
* **identifying potential clients** (C), (LI);
* **communicating with potential clients** (LO), (C);
* **legal and regulatory compliance** (LO), (LI) - complying with the Company's regulatory and other legal obligations (e.g. if we suspect fraud or money laundering);
* **legal or regulatory disclosures** (LO), (LI) to comply with lawful requests by public or regulatory authorities or other third parties, court or discovery orders, or where otherwise required or permitted by applicable laws

**SUPPLIERS**

# What personal data do we collect and process?

## We will collect various types of personal data about you for the purposes described in this Privacy Notice including:

* **Personal details:** your title, name(s), business contact details (e.g. address, telephone or mobile number, e‑mail);
* Any other personal data which you choose to disclose to Company personnel during the course of our relationship with you;

## Certain additional information will be collected where this is necessary and permitted by local applicable laws and we will let you know if this arises.

# How does the company collect data?

## You will usually provide this information directly to the Company at the start of the business relationship and by periodic updates.

# What are the purposes for which data is processed and what is our legal basis for carrying out the processing?

We collect and process your personal data for purposes including:

* **receiving goods and services and operating our contract with you** (C), (LI);
* **identifying suppliers** (C), (LI);
* **communicating with suppliers** (LO), (C);
* **legal and regulatory compliance** (LO), (LI) - complying with the Company's regulatory and other legal obligations;
* **litigation** (LO), (C), (LI) - to enforce our legal rights and comply with our obligations, and for any necessary purposes in connection with any legal claims made by, against or otherwise involving you;
* **legal or regulatory disclosures** (LO), (LI) to comply with lawful requests by public or regulatory authorities or other third parties, court or discovery orders, or where otherwise required or permitted by applicable laws;

**SHAREHOLDERS**

# What personal data do we collect and process?

## We will collect various types of personal data about you for the purposes described in this Privacy Notice including:

* **Personal details:** your title, name(s), gender, nationality, civil/marital status, date of birth, age, home contact details (e.g. address, telephone or mobile number, e‑mail), bank account details, shareholding;
* **Proof of identity:** documents containing photographs (e.g. passport or driving licence), bank statements, utility bills;
* Any other personal data which you choose to disclose to Company personnel during the course of our relationship with you;

## Certain additional information will be collected where this is necessary and permitted by local applicable laws and we will let you know if this arises.

# How does the company collect data?

## You will usually provide this information directly to the Company on becoming a shareholder and updated as required.

# What are the purposes for which data is processed and what is our legal basis for carrying out the processing?

We collect and process your personal data for purposes including:

* **managing your shareholding** (C), (LI)
* **identifying shareholders** (C), (LI);
* **communicating with shareholders** (LO), (C);
* **legal and regulatory compliance** (LO), (LI) - complying with the Company's regulatory obligations;
* **litigation** (LO), (C), (LI) - to enforce our legal rights and comply with our obligations, and for any necessary purposes in connection with any legal claims made by, against or otherwise involving you;
* **legal or regulatory disclosures** (LO), (LI) to comply with lawful requests by public or regulatory authorities or other third parties, court or discovery orders, or where otherwise required or permitted by applicable laws

**PENSION MEMBERS (DEFERRED AND PENSIONERS)**

# What personal data do we collect and process?

## We will collect various types of personal data about you for the purposes described in this Privacy Notice including:

* **Personal details:** your title, name(s), gender, nationality, civil/marital status, date of birth, age, home contact details (e.g. address, telephone or mobile number, e‑mail), national insurance number, next of kin, dates of service;
* **Remuneration, benefits and pension data:** your historic remuneration information (including pay/salary/fees/profit share information as applicable, allowances, overtime, bonus schemes), bank account details, grade, national insurance number, tax information, third party benefit recipient information (e.g. expression of wish and dependants information);
* **Proof of identity:** documents containing photographs (e.g. passport or driving licence), bank statements, utility bills;
* **Communications:** records of communications between you and the Company or the Trustees in relation to your pension and requests or applications you make under the scheme;
* Any other personal data which you choose to disclose to Company personnel during the course of our relationship with you;

Certain additional information will be collected where this is necessary and permitted by local applicable laws and we will let you know if this arises.

## Special categories of data may be collected and processed by the Company for the following purposes:

* **Health and medical information** may be used on the basis of your consent or as required to comply with the Equality Act 2010, in the event that reasonable adjustments are required to accommodate a disability where you choose to disclose this information or in the event that an application for ill health retirement is made.

## Apart from personal data relating to you, you will also provide the Company with personal data of third parties, notably your dependants and other family members, for purposes of management of pension administration. Before you provide such third party personal data to the Company you must first inform these third parties of any such data which you intend to provide to the Company and of the processing to be carried out by the Company, as detailed in this Privacy Notice.

# How does the company collect data?

## The Company collects and records your personal data from a variety of sources, but mainly directly from you. Some information will be provided from Company systems and HR (e.g. remuneration data)

# What are the purposes for which data is processed and what is our legal basis for carrying out the processing?

We collect and process your personal data for purposes including:

* **pension provision and administration** (LO), (C) - providing and administering pension entitlements, managing contributions and making appropriate tax and social security deductions and contributions;
* **identifying pension members** (C), (LI);
* **communicating with pension members** (LO), (C);
* **legal and regulatory compliance** (LO), (LI) - complying with the Company's regulatory obligations (e.g. complying with our duties under the Pensions Act or if we suspect fraud or money laundering or reporting to HM Revenue and Customs);
* **litigation** (LO), (C), (LI) - to enforce our legal rights and comply with our obligations, and for any necessary purposes in connection with any legal claims made by, against or otherwise involving you;
* **legal or regulatory disclosures** (LO), (LI) to comply with lawful requests by public or regulatory authorities or other third parties, court or discovery orders, or where otherwise required or permitted by applicable laws

**EMPLOYEES AND FORMER EMPLOYEES**

We collect personal data concerning our own personnel as part of the administration and management of your contract and your relationship with you.

Please refer to the separate Employee Data Privacy Notice.

**RECRUITMENT APPLICANTS**

We collect personal data as part of the recruitment process.

Applicants should refer to the separate Recruitment Data Privacy Notice.

**VISITORS TO OUR OFFICE**

We have safety and security measures in place at our office including building access controls.

We require visitors to our office to sign in at reception and provide their name and organisation. We keep the record of visitors for 12-18 months unless required longer as a result of an incident occurring on site during the visit. Our visitor records are securely stored and only accessible on a need to know basis (e.g. to look into an incident).

**VISITORS TO OUR WEBSITE**

We receive personal data such as name, title, email address and telephone number when an individual submits an enquiry from our website. We will use the personal data for the purposes for which it was provide to us in the enquiry.