

## Who are we

Forthplus Pensions Limited (Forthplus) will be what is known as the “Controller” of the personal data you provide to us. Forthplus’s company registration number is 07990504 and its registered address is Elma House, Beaconsfield Close, Hatfield, Hertfordshire, AL10 8YG. Its administrative centre and correspondence address is 83 Princes Street, Edinburgh EH2 2ER. Telephone: 0131 718 0686. Email: [enquiries@forthplus.com](mailto:enquiries@forthplus.com).

Forthplus are committed to protecting and respecting your privacy and will comply with all data protection laws in the country you are resident and use the European Economic Area’s General Data Protection Regulations (GDPR), in force 25th May 2018, as the standard.

Additional in the provision of The Forthplus SIPP is Forthplus Trustees Limited, who are the Trustee of the pension scheme and are also a “Controller” of the personal data you provide to us. However, Forthplus Trustees Limited do not administer the pension scheme, that role remains with Forthplus Pensions Limited as the Scheme Administrator. Forthplus Trustees Limited’s registration number is 09459216 and its registered address is also Elma House, Beaconsfield Close, Hatfield, Hertfordshire, AL10 8YG. The correspondence address for Forthplus Trustees Limited is 83 Princes Street, Edinburgh EH2 2ER. Telephone: 0131 718 0686. Email: [compliance@forthplus.com](mailto:compliance@forthplus.com).



## Managing your data

### What we need:

Unless otherwise agreed with you, such as within the Terms and Conditions for application to The Forthplus SIPP, we will normally only collect basic personal data about you, which does not include any special categories of personal information about you (often known as “sensitive personal data”). This information does, however, include your name, gender, addresses, email address, phone number(s), date of birth, National Insurance number, marital status, your spouse/civil partner’s name and date of birth, and details of any pensions you may wish to transfer to The Forthplus SIPP, any intended contributions you may wish to make to the pension scheme, how you may be considering investing and to whom you may wish to leave your pension in the event of your death.

We may also hold Anti-Money Laundering documentation for you such as copy passport and utility bill, copies of benefit statements from other pension providers and evidence of source of funds, such as bank statements or salary statements where contributions are being made.

Although we may come across personal data during the process, the need to collect sensitive personal data will only ever arise when, in processing your application, we discover information and subsequent questions, that will require sensitive personal data to answer. We require your explicit consent to process this sensitive personal data and therefore will contact you directly when collecting and processing the information, and the provision by return will confirm your consent, should this need arise.

### Why we need it:

During initial prospecting of membership of The Forthplus SIPP, we may be provided with this information to provide you and your financial adviser

with application documentation and illustrations, to assist you in considering an application to The Forthplus SIPP and to assist in the application process should you decide to proceed.

Furthermore, should you proceed with the application for membership, we will require the information to be able to provide you with the product you are applying for and to be able to meet our own legal obligations with respect to the provision of the product.

We need to have basic personal data in order to carry out lawful obligations arising from contracts entered into between you and Forthplus and to provide you with the information and services that you have requested from us. We will never collect any personal data from you that we do not need in order to provide and oversee the services we have agreed to provide you with.

### How we obtain it:

As Forthplus only deal with regulated adviser firms, the personal data we receive for you will either be provided to us by your appointed adviser firm, or by you directly. We may occasionally ask you directly to provide us with personal data. The information may be provided to us by post, email, telephone, fax or where available, through our secure online portal.

### What we do with it:

All the personal data we hold about you will be processed by our staff in the United Kingdom. No third parties will have access to your personal data unless there is a legal requirement or it is required to fulfil the processing, maintenance and completion of the contract between you and Forthplus, such as your financial adviser, address & identity verification agencies, the bank holding your funds, current pension

providers as part of the transferring process where necessary or the investment providers holding your investments, or other companies within the Forthplus group protected under this privacy policy to only be used for the purposes you request.

Some of these third parties may require your personal data to be transferred to, processed and stored at, a destination outside the European Economic Area. By submitting your personal data, you agree to this transfer, processing and storing. Please also be aware that your information may be stored on a cloud-based system whose servers are located within the European Union.

As a rule, Forthplus do not send marketing material to our members or share your information with any other organisation for marketing purposes. If this changes in the future we will ask for your express consent before anything is sent to you or provided to third parties about you.

### How long we keep it:

If you have entered into a contract with Forthplus for you to become a member of The Forthplus SIPP, we will keep your personal data for a minimum of 6 years after you cease to be a member, to ensure we meet our legal and regulatory obligations.

If we have received your personal data as a prospective member but you have not entered into a contract with Forthplus to become a member of The Forthplus SIPP, we will destroy all personal data held for you 3 months from the date we first obtained it. Should you still wish to become a member of the Forthplus SIPP thereafter, your personal data will need to be resubmitted.

## Your rights:

Under data protection legislation, you have several rights regarding the use of your personal data, as follows:

- You have the right if, at any point, you wish to either confirm whether your personal data is being processed and/or access the data we hold on you, you can request to see this information, usually free of charge, and we will respond to you within one month
- You have the right for certain data you have provided Forthplus with to be provided to you in a structured and commonly used electronic format (i.e. a Microsoft Excel file), so that you can move, copy or transfer this data easily to another data controller. You may also request that we transmit this data directly to another organisation, where it is practical for us to do so
- You have the right to have data corrected if it is inaccurate or incomplete
- You have the right to have data deleted if it is no longer needed or there is no longer a legitimate reason for the processing, or if the data in question has otherwise unlawfully been processed. You may also request deletion of your personal data if it was only being processed as a result of you consenting to this and you now withdraw your consent
- You have the right to object to the processing of your personal data (please note that this only provides you with the right to raise your objections, not a blanket right to have any and all processing cease)
- You have the right to restrict the processing of your personal data under certain circumstances, including if you have contested its accuracy and while this is being verified by Forthplus, or if you have objected to its processing and while Forthplus is considering whether it has legitimate grounds to continue to do so

### How to complain about the use of your data:

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights outlined above, you can contact our Data Protection Officer, Robert Parker, at [compliance@forthplus.com](mailto:compliance@forthplus.com) or write to him at the Edinburgh address given above and he will investigate your concerns.

If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to the Information Commissioner’s Office (ICO). You can find further information about the ICO and their complaints procedure here: <https://ico.org.uk/concerns>.