Boal & Co

Retirement Benefit Solutions | Pension Trustee Services, Pension Administration, Actuarial Services

Privacy Policy

Introduction

This Privacy Notice sets out how Boal & Co deals with your personal information which we collect in the course of you and people and entities connected with you interacting with Boal & Co entities or using our website. We take privacy and security of your personal information seriously and will only use such personal information as set out in this Privacy Notice and in ways which are reasonably ancillary to what is set out below.

References to "**Boal & Co**", "**We**", "**us**" are to any or all of Boal & Co (Pensions) Limited, Boal & Co Limited and/or its group entities or affiliates acting in its capacity as a Data Controller or Data Processor (where the Data Controller is a non-Boal & Co group entity).

References to "**you**" include all individuals whose personal information we collect, hold and process in the course of operating our businesses and our website.

Contact Details

You can contact the Boal & Co Data Protection Officer in relation to data protection and your rights by email **dpo@boalco.com** or in writing to: **The Data Protection Officer** Boal & Co, Marquis House, Isle of Man Business Park, Douglas, Isle of Man, IM2 2QZ, British Isles

1. Where we obtain your personal information

1.1 We collect your personal information from the following sources:

1.1.1 personal information which you give to us, including but not limited to:

1.1.1.1 such other forms and documents as we may request that are completed in relation to the administration/ management of any of our services;

1.1.1.2 information gathered through client due diligence carried out as part of our compliance with regulatory requirements; or

1.1.1.3 any personal information provided by way of correspondence with us by phone, e-mail or otherwise;

1.1.2 personal information we receive from third party sources, such as:

1.1.2.1 your legal and/or financial advisors;

1.1.2.2 other financial institutions who hold and process your personal information; and

1.1.2.3 credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements; and

1.1.3 for corporate pension schemes we will also collect personal information from your employer and the scheme's appointed agents such as their Trustee, broker, intermediary, financial adviser, or plan administrator. This information is required to enable us to provide the services we have been engaged to carry out.

2. What personal information will we collect?

We will collect and process personal information given to us by form filling, phone, email and our websites. We may also collect information from properly appointed agents and information that is in the public domain and other industry-wide sources.

For corporate pension schemes we will also collect personal information from employers and the scheme's appointed agents such as their Trustee, broker, intermediary, financial adviser, or plan administrator. This information is required to enable us to provide the services we have been engaged to carry out.

2.1 The types of personal information we may collect includes:

2.1.1 Your identification information (which may include your name, ID card and passport numbers, nationality, place and date of birth, gender, photograph and/or IP address and personal information relating to claims, court cases and convictions, politically exposed person (PEP) status, personal information available in the public domain and such other information as may be necessary for Boal & Co to provide its services and to complete its client due diligence process and discharge its AML/CFT obligations);

2.1.2 Your tax status information (which may include your tax residency, tax ID and tax status);

2.1.3 Your contact information (which may include postal residential and business addresses, personal and business e-mail address and your home, business and mobile telephone numbers);

2.1.4 Your family relationships (which may include your marital status, the identity of your spouse and the number of children that you have);

2.1.5 Your professional and employment information (which may include your level of education and professional qualifications, your employment, employer's name and details of directorships and other offices which you may hold);

2.1.6 Where required, we may also collect sensitive information such as medical and health details to allow us to consider any benefit claims or calculate benefits.

2.1.7 Financial information, sources of wealth and your assets (which may include details of your salary, assets, sources of wealth, shareholdings and your beneficial interest in assets, your bank details and your credit history); and

2.2 We may also collect and process personal information regarding people connected to you, either by way of professional (or other) association or by way of family relationship.

If we are provided with personal information on other individuals, it is understood that in doing so all necessary permissions and consents have been received, and, where necessary, all affected persons have been informed about the content of our Privacy Policy.

3. How do we use your personal information?

3.1 We will collect and use your personal information on the following lawful grounds:

3.1.1 the processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests;

3.1.2 the processing is necessary to comply with our contractual duties and service obligations;

3.1.3 the processing is necessary to comply with our legal and regulatory obligations;

3.1.4 (on exceptional occasions) where we have obtained your consent to processing your personal information for a specific purpose; and

3.1.5 on rare occasions, where it is needed in the public interest.

3.2 Pursuant to paragraph 3.1 above, your personal information may be processed for the contractual and legal purposes set out below:

3.2.1 to provide trustee, administration, actuarial and / or consulting services to a pension scheme of which you are a member of

3.2.2 to identify individuals that contact us

3.2.3 to communicate with members, employer and advisors as necessary in respect of a pension scheme

3.2.4 to make and receive payments

3.2.5 for fraud prevention and detection purposes

3.2.6 to comply with legal and regulatory requirements and international/economic or financial sanctions laws

3.2.7 monitoring and recording telephone and electronic communications and transactions:

3.2.7.1 for quality, business analysis, training and related purposes in order to improve service delivery; and

3.2.7.2 for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act);

3.2.8 disclosing your personal information to any bank or financial institution in providing our services;

3.2.9 to enforce or defend our legal and contractual rights or those of third party service providers;

3.2.10 collecting, processing, transferring and storing customer due diligence, source of funds information and verification data under applicable anti-money laundering and terrorist financing laws and regulations; and

3.2.11 liaising with or reporting to any regulatory authority (including tax authorities) with whom we are either required to cooperate or report to, or with whom we decide or deem it is appropriate to cooperate;

this list is non-exhaustive.

4. Sharing personal information

4.1 Where necessary we will share your personal information provided for the purposes of providing our services with the types of recipients described below:

4.1.1 group companies

4.1.2 appointed advisors and providers, including scheme trustee and administrators, banks, financial institutions, brokers, intermediaries, financial advisers, auditors and legal professionals

4.1.3 regulatory and legal bodies

4.1.4 government or tax authorities

4.1.5 law enforcement

4.2 Where we share your personal information with a group company and/or third party service provider outside the Isle of Man and European Economic Area, we require the recipients of that personal information to put in place adequate measures to protect it, including by entering into appropriate data transfer agreements such as the EU standard contractual clauses. If you would like further information about the safeguards we have in place to protect your personal information, please contact dpo@boalco.com.

5. How long do we keep personal information?

5.1 Your personal information will be retained for as long as required:

5.1.1 for the purposes for which the personal information was collected;

5.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or

5.1.3 as required by data protection laws and any other applicable laws or regulatory requirements.

6. What happens if you fail to provide personal information to us?

6.1 If we are not provided with required personal information for the services that have been requested or provide you with benefits from the scheme to which you may be entitled.

7. What rights of access and control of personal information do I have?

7.1 You have the following rights in respect of the personal information about you that we hold and / or process:

7.1.1 the right to access personal information (by way of a subject access request);

7.1.2 the right to rectify personal information if inaccurate;

7.1.3 the right to restrict the use processing of personal information;

7.1.4 the right to request that personal information is erased;

7.1.5 if we are processing personal information with consent, consent may be withdrawn at any time (the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal); and

7.1.6 the right to object to processing of personal information.

7.2 You also have the right to lodge a complaint about the processing of your personal information either with us or by contacting the Isle of Man Information Commissioner (https://www.inforights.im/).

7.3 If you wish to exercise any of the rights set out in this paragraph 7, please contact dpo@boalco.com

8. How do I correct inaccuracies or amend information?

Please let us know as soon as possible if any of your personal information changes (including your correspondence details). Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to provide services.

9. Social Networking

The views and opinions of Boal & Co Directors and employees published on social networking websites such as, but not limited to; linkedin.com twitter.com and facebook.com do not necessarily reflect those of Boal & Co. Social networking website posts are not intended as legal or financial advice and should not be relied on as such.

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12. Questions

If you have any questions about this Disclaimer or Privacy Notice or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact dpo@boalco.com.

Boal & Co

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Our focus; your financial future.

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For further information on the regulatory status of our businesses please visit boalco.com/regulatory