PRIVACY NOTICE

The Embark Pensions Privacy Notice applies to customers and prospective customers of Embark Pensions (a trading style of EBS Pensions Limited and Embark Services Limited. EBS Pensions Limited and Embark Services Limited are wholly owned subsidiaries of Embark Group Limited. This details how we will collect and process the personal data that we hold about you and your rights under the Data Protection Act in respect of the data held.

As defined under UK Data Protection legislation and regulations:

. EBS Pensions Limited will be the Data Controller of the Embark Pensions Option SIPP, Embark Pensions Full SIPP, EBS SIPP, EBS SAPPP, Liberty SIPP and the Liberty One SIPP.

. Embark Services Limited will be the Data Controller for the Hornbuckle Mitchell SIPP; the Hornbuckle Mitchell FIPP; the Private Pension; the Hornbuckle Mitchell Private Pension; and the Freedom SIPP.

The lawful basis and purpose for the processing of your data

Embark Group Limited and its subsidiaries will only process your personal data where we have a lawful basis for doing so. This includes:

- where you have provided positive consent to us;
- where processing is necessary for the performance of a contract between you and us or to take steps to enter into a contract;
- where processing is necessary for compliance with a legal or regulatory obligation; and
- where we have a legitimate interest upon which the data may be processed. Any decision to process data on the basis of legitimate interest will be made on a case by case basis and in line with the guidance set out in UK Data Protection legislation.

The information that we collect

We will collect personal data from you at the outset of your relationship with us, from your application as well as from other third parties such as your financial adviser and any providers that are transferring money or assets to us on your instruction. We will also collect personal data from you and other third parties you instruct on your behalf throughout the course of your relationship with us.

This personal data will include:

- contact information such as name and address, telephone numbers and email addresses;
- information from your contact with us – voice recordings from telephone calls, letters and emails;
- socio-demographic information – age, employment status, profession, earnings, gender, other sources of wealth;
- family circumstances information – marital status, beneficiary information;
- transactional information – account transactions, access to our online client portals;
- legal – national identifiers, copy documents relating to your identity, nationality and citizenship such as birth certificate, passport, proof of address documents, marriage certificates; and
- special category data if necessary, such as information relating to your health, such as medical conditions and disabilities.

Sharing your personal data

We may disclose your personal data to other companies within the Embark Group of companies and third parties which provide services in connection with the administration of your account.

We may also share your personal data for legitimate business reasons or as may be required by applicable law and regulations with your Financial Adviser, third parties appointed by your Financial Adviser, third party investment managers, and product providers with whom you or your Financial Adviser instructs us to invest.

We may disclose your personal data to a credit reference agency in order to verify your details both during the application process and the ongoing administration of your account. This data will be used to prevent fraud and money laundering and to check your identity. Any checks performed may be recorded on your credit history.

We will disclose your personal data to any governmental, legal or regulatory body if required to do so by applicable law and regulation.

We may need to disclose sensitive personal data about you to third parties, such as information relating to your health where required to do so to give effect to an instruction from you or your Financial Adviser in respect of your account.

We may need to transfer your personal data to another country, in which case we will ensure that your personal data is afforded the same level of protection as is required under UK Data Protection legislation and regulations prior to sending your personal data.

We will otherwise keep your personal data confidential and never use it for any other purpose or pass your details to any third parties without your consent.

Retention of your personal data

We will retain your personal data for no longer than is necessary to provide the services under the Terms and Conditions applicable to the account and to meet any legal or regulatory obligations that may apply.

Your Data Protection rights

You have a number of rights under the Data Protection laws, including:

1. the right to request a copy of the personal information we hold on you. When you request this information, this is known as making a Subject Access Request (SAR). In most cases, this will be free of charge, however in some limited circumstances, for example, repeated requests for further copies, we may apply an administration fee;
2. the right to have personal information we hold about you transferred securely to another service provider in electronic form;
3. the right to have any inaccurate personal information corrected;
4. the right to have any out of date personal information deleted once there's no business need or legal requirement for us to hold it;
5. the right to object or restrict some processing, in limited circumstances and only when we don't have legitimate grounds for processing your personal information; and
6. the right to object to your personal information being used to send you marketing material. We will only send you marketing material where you've given us your consent to do so. You can remove your consent at any time.

Important information

If you have any questions regarding how we use the data that we collect please contact:

The Group Data Protection Officer
The Embark Group
33 Old Broad Street
London, EC2N 1HZ

If you are not satisfied with any aspect of how we have managed your data you have the right to complain to the Information Commissioner's Office. For further details of your rights under the UK's data protection legislation and regulation please contact the Information Commissioner's Office at **https://ico.org.uk/for-the-public**.

By signing one of our product application forms, you consent to the use of your Personal information for the purposes and on the terms set out above. You have the right to withdraw consent at any time.

Changes to our Privacy Notice

Any changes we make to our Privacy Notice are posted on our website at **embarkpensions.co.uk/privacy-notice**. Please check back frequently to see any updates or changes.

Contact

Questions, comments and requests regarding this Privacy Notice are welcomed and should be addressed to **customerservices@embarkpensions.co.uk**. Alternatively, please telephone **0344 544 0566** or write to us, Embark Pensions, Provincial House, 37 New Walk, Leicester, LE1 6TU.

Embark Pensions
Provincial House, 37 New Walk, Leicester, LE1 6TU
T: 0344 544 0566 **E:** customerservices@embarkpensions.co.uk **W:** embarkpensions.co.uk

EBS Pensions Limited act as operator for the Option SIPP, Full SIPP, Liberty SIPP, EBS SIPP and EBS SAPPP. Embark Services Limited act as operator for the Hornbuckle Mitchell SIPP, Hornbuckle Mitchell Private Pension, Hornbuckle Mitchell FIPP, The Private Pension and the Freedom SIPP.

Embark Pensions is a trading name of EBS Pensions Limited and Embark Services Limited. EBS Pensions Limited is a company incorporated in England and Wales (company number 00998606) with its registered office at 33 Old Broad Street, London, EC2N 1HZ. EBS Pensions Limited is authorised and regulated by the Financial Conduct Authority (Financial Services Register number 134908).

Embark Services Limited is a company incorporated in England and Wales (company number 02089815) with its registered office at 33 Old Broad Street, London, EC2N 1HZ. Embark Services Limited is authorised and regulated by the Financial Conduct Authority (Financial Services Register number 120820).

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