



**SSAS Practitioner.com**  
**The SSAS Specialist**

Lowering Fees, Enhancing Retirement

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# DATA PRIVACY POLICY

## KEY DETAILS

Policy prepared by: SSAS Practitioner.com Limited  
Approved by management on: 9th May 2019

Policy became operational on: 25th May 2019  
Next review date: 25th May 2020



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## 1 INTRODUCTION

SSAS Practitioner.com Limited needs to gather and use certain information about individuals.

We use your email contact details to remind you of issues that arise in the industry through our regular newsletters.

If you are not happy for us to contact you, please email us at [info@ssaspractitioner.com](mailto:info@ssaspractitioner.com). Otherwise we may contact you by email with regular newsletters, and other material directly relevant to the administration of your scheme.

We SSAS Practitioner.com Limited:

- Are going to use the information you provided to us to set-up the scheme with HMRC or take-over the running of the scheme and to set up various investments, including bank accounts.
- Will share the information provided to us with various providers, deposit holders and third parties appointed to act for the scheme, if necessary.

SSAS Practitioner.com Limited take your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us.

We have no intention of sharing data with any third parties for marketing purposes. These include customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards - and to comply with the law.

## 2 WHY THIS POLICY EXISTS

This data privacy policy ensures SSAS Practitioner.com Limited complies with data protection law and follows good practice, protects the rights of staff, customers and partners, is open about how it stores and processes individuals' data and protects itself from the risks of a data breach.



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### **3 DATA PROTECTION LAW**

The Data Protection Act 1998 and the subsequent General Data Protection Regulation 2016, describe how organisations, including SSAS Practitioner.com Limited, must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act 1998 is underpinned by eight important principles and the General Data Protection Regulations 2016 by a further six. These say that personal data must:

#### **DATA PROTECTION ACT 1998**

1. Be processed fairly and lawfully;
2. Be obtained only for specific, lawful purposes;
3. Be adequate, relevant and not excessive;
4. Be accurate and kept up to date;
5. Not be held for any longer than necessary;
6. Be processed in accordance with the rights of data subjects;
7. Be protected in appropriate ways; and
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection.

#### **THE GENERAL DATA PROTECTION REGULATION 2016**

1. Be processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. Be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that *are* inaccurate, having regard to the purposes for which *they are* processed, *are* erased or rectified without delay;
5. Be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data *are* processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research



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purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by GDPR in order to safeguard the rights and freedoms of individuals; and

6. Be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

## **4 PEOPLE, RISKS AND RESPONSIBILITIES**

### **4.1 POLICY SCOPE**

This policy applies to:

- The office of SSAS Practitioner.com Limited.
- 'All staff' of SSAS Practitioner.com Limited.
- 'All other staff' - all contractors, suppliers, volunteers and (including but not limited to) any other person/persons working on behalf of SSAS Practitioner.com Limited.

It does not apply to any organisation outside that of SSAS Practitioner.com Limited.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998 and The General Data Protection Regulation 2016. This can include:

- Names of individuals;
- Postal addresses;
- Email addresses;
- Telephone Numbers; and
- Any other information relating to individuals.

### **4.2 DATA PROTECTION RISKS**

This policy helps to protect SSAS Practitioner.com Limited from some very real data security risks, including:

- **Breaches of Confidentiality** - For instance, information being given out inappropriately.
- **Failing to offer choice** - All individuals should be free to choose how the company uses data relating to them.
- **Reputational damage** - For instance, the company could suffer if 'hackers' successfully gained access to sensitive data.



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## 4.3 RESPONSIBILITIES

Everyone who works for or with SSAS Practitioner.com Limited has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, the following people have **key** areas of responsibility:

**Managing Director | Mr Peter Jones:**

Is responsible for ensuring that SSAS Practitioner.com Limited meets its legal obligations.

**Data Protection Officer | Mr Peter Jones:**

Is responsible for:

- Keeping '*staff*' and '*other staff*' members (all employees, contractors, volunteers and any other person/s working for SSAS Practitioner.com Limited) updated about data protection responsibilities, risks and issues.
- Arranging data protection training and advice for the people covered by this policy.
- Handling data protection questions from *staff* (employees of SSAS Practitioner.com Limited) and '*other staff*' covered by this policy.
- Dealing with requests from individuals to see the data SSAS Practitioner.com Limited holds about them (also called 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.

**IT Manager | Mrs Kerry Smith:**

Is responsible for:

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning *properly* (correctly and efficiently).
- Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.

**Marketing Manager | Mrs Ann Sturman:**

Is responsible for:

- Approving any data protection statements attached to communications such as emails and letters.
- Addressing any data protection queries from journalists or any other media or social media outlets.
- Where necessary, working with other '*staff*' and '*other staff*' members to ensure marketing initiatives abide by data protection principles.



## 5 GENERAL STAFF GUIDELINES

- The only people able to access data covered by this policy should be those that require it **for the purpose of their 'work'**.
- Data **should not be shared informally**. When access to confidential information is required, employees can request it from their line managers.
- **SSAS Practitioner.com Limited will provide training** to all 'staff' to help them understand their responsibilities when handling data.
- 'Staff' should keep all data secure, by taking sensible precautions and following the guidelines below.
- Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
- Data should be **regularly reviewed and updated** if it is found to be out of date. If no longer required, it should be deleted and disposed of immediately and in the correct manner.
- 'Staff' **should request help** from their line manager or the data protection officer if they are unsure about any aspect of data protection.

## 6 DATA COLLECTION

We may collect personal data set out in the table below through one or more of the following channels:

Personal Data Type	Source
First name	Website opt in forms, SSAS Application Forms, Member Questionnaires, anti money laundering documents and HMRC Fit and Proper Declaration.
Last name	Website opt in forms, SSAS Application Forms, Member Questionnaires, anti money laundering documents and HMRC Fit and Proper Declaration.
Postal Address	SSAS Application Forms, Member Questionnaires, anti money laundering documents and HMRC Fit and Proper Declaration.
Email Address	Website opt in forms, SSAS Application Forms, member Questionnaires and HMRC Fit and Proper Declaration.
Telephone	SSAS Application Forms, Member Questionnaires and HMRC Fit and Proper Declaration.
Date of Birth	Member Questionnaires, anti-money laundering documents and HMRC Fit and Proper Declaration.
National Insurance Number	Member Questionnaires and HMRC Fit and Proper Declaration.
Personal Unique Tax Reference Number	HMRC Fit and Proper Declaration

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The personal data that we collect, will be limited to what is necessary for the purposes for which it is collected and will be used as follows:

- To contact you via newsletters about all relevant industry updates and legislation changes.
- Internal administrative purposes.
- To offer data to official third party organisations for legitimate business interests.

## **7 DATA STORAGE**

These rules describe how and where data should be safely stored. Questions about the safe storage of data can be directed to the IT Manager or Data Protection Officer.

### **7.1 PAPER STORAGE**

- Where data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it. This also applies to data usually stored electronically but for work purposes has been printed out onto paper.
- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- 'Staff' or 'other staff' members should ensure that any paper or printouts including data are not left in a place where unauthorised people could see them. An example of this could be documents left on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

### **7.2 ELECTRONIC DATA STORAGE**

- When data is stored electronically, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.
- Data should be protected by strong passwords that are changed on a regular basis and never shared between employees.
- If data is stored on re-moveable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing service.
- Servers containing personal data should be sited in a secure location, away from the general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices - such as smartphones and tablets.
- All servers and computers containing data should be protected by approved security software and a firewall.



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## **8 RETENTION PERIOD**

Subject to your rights as a data subject and applicable data protection law, SSAS Practitioner.com Limited may process your personal data for a period of 6 years and will store the personal data for a minimum of 6 years as long as the subject is actively receiving and acting upon contact from SSAS Practitioner.com Limited will not be kept for longer than it is needed for the purposes for which it was gathered.

## **9 DATA USE**

- Personal data is of no value to SSAS Practitioner.com Limited unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft.
- When working with personal data, 'staff' and 'other staff' members should ensure the screens of their computers are always locked when left unattended.
- Personal data should not be shared informally. Care should be taken when sending information by email, as this form of communication is not secure.
- Personal data should never be transferred outside of the European Economic Area.
- 'Staff' and 'other staff' members should not save copies of personal data to their own computers. Always access and update the central copy of any data.

## **10 DATA ACCURACY**

- The law requires SSAS Practitioner.com Limited to take reasonable steps to ensure data is kept accurate and up to date.
- It is the responsibility of all 'staff' and 'other staff' members who work with data to take reasonable steps to ensure it is kept accurate and up to date.
- Data will be held in as few places as necessary. 'Staff' and 'other staff' members should not create any unnecessary additional data sets.
- 'Staff' and 'other staff members' should take every opportunity to ensure that data is updated. For instance, by confirming a customers details when they call.
- SSAS Practitioner.com Limited will consider at all times making it easier for data subjects to update the information SSAS Practitioner.com Limited holds about them. For instance, via the company website.
- Data should be updated as inaccuracies are discovered. For instance if a client can no longer be reached on their stored telephone number, it should be removed from the database.



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- It is the marketing managers responsibility to ensure marketing databases are checked against industry suppression files every six months.

## **11 YOUR RIGHTS AS A DATA SUBJECT**

### **11.1 SUBJECT ACCESS REQUESTS**

All individuals who are the subject of personal data held by SSAS Practitioner.com Limited are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a **Subject Access Request**.

Subject access requests from individuals should be made by email addressed to the data protection officer at: **peter.jones@ssaspractitioner.com**. The data protection officer can supply a standard request form, although individuals do not have to use this.

Individuals will not be charged nor will be refused access to each subject access request unless the request is deemed to be 'unfounded or excessive'. The data protection officer will aim to provide the relevant data within 14 days although the law stipulates a time period of 1 month to respond.

Should any data request be refused, reasons why refusal was made and information regarding the complaints procedure will be provided to the individual.

The data protection officer will always verify the identity of anyone making a subject access request before handing over the required information.

### **11.2 FURTHER RIGHTS**

At any point whilst we are in possession of or are processing your personal data, you, the data subject, have the following rights (as well as the right to access your data as above (11.1)):

- Right of rectification. You have the right to correct data that we hold about you that is accurate or incomplete. All reasonable steps will then be carried out to ensure that all



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data is updated immediately (refer to section 10.0 above).

- Right to be forgotten. In certain circumstances, you can ask that the data that we hold about you, be erased from our records.
- Right to restriction of processing. Where certain conditions apply you have a right to restrict the processing.
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- Right of portability. You have the right to have the data we hold about you transferred to another organisation.
- Right to object. You have the right to object to certain types of processing such as direct marketing emails and newsletters.
- Right to object to automated processing.

## **12 DISCLOSING DATA FOR OTHER REASONS**

In certain circumstances, The Data Protection Act 1998 and the General Data Protection Regulation 2016 allow personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances SSAS Practitioner.com Limited will disclose requested data.

Prior to this, however, the data control will ensure that the request is legitimate, and will seek assistance from the company's legal advisers where necessary.

## **13 PROVIDING INFORMATION**

SSAS Practitioner.com Limited aims to ensure that individuals are aware that their data is being processed, and that they understand how their data is being used and how to exercise their rights.

## **14 CONSENT**

By consenting to the privacy notice you are giving us (SSAS Practitioner.com Limited) explicit permission to process any of your personal data which we collect in accordance with this policy for the purposes identified in this notice.

You may withdraw your consent given under this section at any time by contacting our Data Officers. The withdrawal of consent shall not affect the lawfulness of processing based on consent before withdrawal.



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## 15 COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by SSAS Practitioner.com Limited, or how your complaint has been handled, please contact our Data Protection Officer in the first instance using the details below and we will endeavour to resolve your complaint. You also have the right to lodge a complaint with the Information Commissioners Office online ([www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)) or by telephone on 0303 123 1113

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Email | [info@ssaspractitioner.com](mailto:info@ssaspractitioner.com)  
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VAT Registration Number | 983834865  
Data Controller Number | Z2068455  
HMRC Practitioner Registration Number (ID) | 00017124

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Member of AMPS (Association of Member-Directed Pension Schemes)