



ALLTRUSTTM

A UAP Group Company

Alltrust Services Limited

Privacy Notice

Introduction

The Alltrust Privacy Notice applies to customers and prospective customers of Alltrust Services Limited trading as Alltrust. It additionally applies to Alltrust SIPP Limited and Alltrust SSAS Limited, which are wholly owned subsidiaries of Alltrust Limited and act as Trustees. 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.

The Lawful Basis and Purpose For The Processing of your Data

We 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 third parties which provide services in connection with the administration of your account. This may include within the group of undertakings that Alltrust belongs to, for internal controls and reporting purposes.

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:

Data Protection Officer

Alltrust
Suite 201, Warner House
123 Castle Street
Salisbury
SP1 3TB

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 our product application form, 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 alltrust.co.uk. 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 dataprotection@alltrust.co.uk. Alternatively, please telephone 01722 770 450 or write to us, Alltrust, Suite 201 Warner House, 123 Castle Street, Salisbury, SP1 3TB.

Cookie Policy

What is a Cookie?

A cookie is a small piece of data (text file) that a website asks your browser to store on your device in order to remember information about you. This can include remembering information about your visit, such as your country, language preference and other settings.

The cookies set by us are called first-party cookies. We also use third-party cookies which are cookies from a domain different than this website and can be used for user tracking and usability purposes. We don't use cookies to collect information that could identify you personally.

We will use cookies to:

- help us understand how our websites are used on an aggregated basis, so we can improve them for you;
- provide an enhanced user experience for you;
- provide services that are necessary for the running of the website;
- assist you in navigation;
- assist in filling out questionnaires, login, and your ability to provide feedback; and
- analysing your use of our products, services or applications.

We Strictly Necessary Cookies: These cookies are essential, as they ensure your security and privacy when you use our secure sites, as well as enabling you to move around a website and use its features. Without these cookies, services you've asked for (such as access to secure areas) can't be provided. These cookies do not gather information about you that could be used for marketing or remembering where you've been on the internet. This category of cookies cannot be disabled.

Performance Cookies: Information these cookies collect is anonymous and is only used to improve how a website works and to help us identify issues you may have when using our online services.

Functional Cookies: These Cookies are used to provide services or to remember choices you make so we can personalise our content for you. We use this information to customise your experience of our website to meet your preferences for content layout, text size etc.

Targeting Cookies: These cookies and similar technologies gather information about your browsing habits. They remember that you've visited a website and share this information with other organisations, such as advertisers and platforms on which we may advertise. They do this in order to provide you with ads that are more relevant to you and your interests. We do not currently use targeting cookies but may introduce these.

The following page details a list of the cookies we use on our website. A cookie scanning tool regularly scans our websites to maintain a list as accurate as possible:

Accepting/Blocking Cookies

You are able to accept/reject cookies on our website using the banner that first appears at the bottom of our site, even if this has already been accepted. In addition, your website browser will have detailed information on how you can accept, block or delete cookies. Or you can visit the [About Cookies](#) website for more information. Note that deleting or blocking cookies may prevent parts of our websites working correctly.

Our **Privacy Policy** contains more information about how we are committed to protecting and respecting your privacy.

All Cookies in Use

1	cmplz_banner-status : dismissed	5	cmplz_policy_id : 14
2	cmplz_consented_services :	6	cmplz_preferences : allow
3	cmplz_functional : allow	7	cmplz_statistics : allow
4	cmplz_functional : allow		

Alltrust is the trading name of Alltrust Holdings Limited (registered in England number 05643172), Alltrust Services Limited (registered in England number 05365396), and Alltrust SIPP Limited (registered in England number 05398985) with a registered address of Fountain House, Fountain Lane, St Mellons, Cardiff CF3 0FB. Alltrust Services Limited is authorised and regulated by the Financial Conduct Authority (FCA) under FCA registration number 461966. Please note that Trustee services are not regulated by the FCA.