

Data Protection Policy and Privacy Notification

Momentum Pensions (Gibraltar) Limited ("Momentum" / "we" / "us", "our") collects information from our applicants and Members predominantly through our Application form but also through any subsequent interactions with you, whether by email, post, face-to-face meetings, phone or through your Professional Adviser.

The below sets out the way Momentum collects, stores and otherwise uses data relating to you (your personal data) and the reasons for doing that. By providing information through our Application form, by email, post, phone, in person, through your Professional Adviser and/or through any other medium, you are accepting and consenting to Momentum's use of your personal data in the manner described below.

Personal Data Collected

Personal information is collected in accordance with the Momentum Application form. This information includes your name, address, email address, contact phone number(s) and national insurance number, as well as details of your spouse / partner, employment and earnings details, other pension arrangements (if you intend to transfer any scheme), details of your Professional Adviser and Investment Management Strategy, and details of nominated beneficiaries linked to any death benefits.

In addition to the above, Momentum requests the provision of certain identification documents that are listed within the Application form and which include your passport, driving licence, a utility bill and/or salary slip, in support of your Application (for verification and regulatory purposes). You may also provide further information (either on request or voluntarily) by email, post, in face-to-face meetings or by phone. Finally, your Professional Adviser may pass on information which you have provided to them and which relates to the administration of our services.

Momentum will not intentionally or systematically seek to collect, store or otherwise use information about you classed as 'sensitive personal data' (for example, information relating to any trade union membership, ethnic origin or medical conditions). We cannot prevent you or your Professional Adviser from disclosing the same to Momentum as part of your correspondence with us but you should ensure that such information is only provided where it is absolutely necessary and in circumstances where you would be content for us to use it in the manner described below.

Using Your Information

Momentum predominantly uses the information referred to above:

- in connection with the provision of services to you in order to administer and run your pension scheme. This may involve seeking, receiving and processing instructions from you and/or your Professional Adviser, fulfilling our obligations to you, responding to any request made by you and/or your Professional Adviser and/or communicating changes to the scheme/services in question;
- in order to adequately audit and risk assess the services provided;
- in order to contact you either directly or through your Professional Adviser, including updating you in relation to our services;
- in order to carry out full customer due diligence;
- in order to comply with relevant regulations and obligations including obligations relating to money laundering, fraud and crime prevention. This includes performing screening checks at application stage and on a periodic basis thereafter.

Sharing Your Information

Momentum might share your information with others, in limited circumstances. Predominantly that sharing is carried out in order to ensure that our services are provided and administered successfully and in compliance with our regulatory and professional obligations. Your information may be shared by Momentum as follows:

- We will share information with your Professional Adviser, relevant system, scheme and product providers and Investment Managers where necessary in connection with our services and services intrinsically linked to the same. Where necessary, Momentum sends a copy of the Application form to the Investment provider and if the transferring scheme asks for details, Momentum will provide them with such information as detailed in the Application form
- We will share your information amongst Momentum's group companies (including companies which partially own, or are owned by, Momentum and/or which share the Momentum brand and includes Momentum Pensions Limited (UK Registration Number 3686070), Momentum Pensions Malta Limited (Malta Registration Number C52627), Momentum Pensions Limited (Isle of Man Registration Number RA102) and Momentum Pensions (Gibraltar) Limited (Gibraltar Registration Number 109892) (collectively the Momentum Group), as they will be involved in connection with the purposes identified above.
- We will share information with the Momentum Group's regulators and professional advisers including, for example, HM Revenue and Customs (and/or other relevant tax authorities) and the Financial Conduct Authority (and/or other relevant regulators), our auditors and legal advisers in order to comply with relevant obligations, regulations and other legal requirements.
- We may need to disclose your information if required by law, if we believe that disclosure is necessary to comply with a current judicial proceeding, or a court order or legal process served on us, in order to enforce our terms and other agreements or to protect the property, rights or safety of Momentum, our members or others.
- In the event the Momentum Group goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, your information will, in most instances, be part of the assets transferred.
- Momentum Pensions Limited works with a third party in Malta and in the United Kingdom which provides physical storage space for records and other documents. Certain of your information may be included within those records and documents. Storage of electronic information will be on Momentum Group servers which is located within the territories which Momentum operates.
- We may share information with analytics and search engine providers that assist us in the improvement and optimisation of our website.
- We will not seek to share your information other than in the way set out above without taking steps to gain your consent to the same. However, if we are unable to obtain instructions, we may share information where, in our view, it is in your legitimate interests for us to do so.

We will seek at all times to ensure that your information is shared in a secure manner. Unfortunately, the transmission of information (in particular, via the internet) is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of data transmitted either through the Website or by post, email or phone. However, we have and will continue to put in place strict procedures to uphold the security of your information.

Transferring Your Information Internationally

As set out above, we will share your information amongst the Momentum Group and with third parties (including Investment Managers and your Financial Advisor). As such, this will involve transferring your information internationally, including transfers outside the European Economic Area (EEA).

Whilst we may transfer your information to Momentum Pensions Limited in the Isle of Man, we note that the European Commission has decided that there is an "adequate level of protection" afforded to individuals' personal data within that state and we therefore rely on that decision.

Momentum takes steps to ensure that the transfers outside EEA are legitimate and in these circumstances, agreements which include the EU standard model clauses will be put in place between Momentum entities which are transferring the data and those entities operating outside the EEA who are receiving the data. The receiving entities will be mainly your Investment Providers and Financial Advisors.

Changes to this Policy

Momentum will occasionally update this Policy / Notification to reflect company and customer feedback. We will contact you to inform you of the same.

Your Rights and Contacting Us

Momentum is registered with the Data Protection Commissioner as a Data Controller under the applicable data protection legislation in each territory in which Momentum is registered.

You have the right to access information held about you. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

Any request or other questions or comments relating to your information should be addressed to the following address:

Momentum Pensions (Gibraltar) Limited

19A Town Range
PO Box 872
GX11 1AA
Gibraltar

Email: gibraltar@momentumpensions.com