



## Privacy Notice

This document replaces section 20. Data protection of the Titan Pensions & Investments Advisory Service terms and conditions.

1. If you open an account with us you will need to provide us with personal information about yourself and (in the context of joint accounts or if you are a corporate customer), about other individuals. In such cases it will be your responsibility to ensure that you have the consent of the people concerned to pass their information on to us.
2. Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information. We will use your information collected from the website to personalise your repeat visits to the site. Full details of how cookies work is provided on our website [www.titanpi.co.uk](http://www.titanpi.co.uk)
3. The primary legal basis that we intend to use for the processing of your data is for the performance of our contract with you. The information that we collect about you is essential for us to be able to carry out the services that you require from us effectively. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations.
4. To fulfil our obligations in respect of anti-money laundering and other financial crime we will send your details to credit referencing agencies for identity verification purposes.
5. During the course of our relationship with you we will retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship.
6. We are also subject to regulatory requirements to retain your data for specified minimum periods. These are generally:
  - Five years for investment business
  - Indefinitely for pension transfers and opt-out business

These are **minimum** periods, during which we have a legal obligation to retain your records.

We reserve the right to retain data for longer where we believe it is in our legitimate interests to do so.

7. Transfers of personal data outside the European Economic Area

SEI may transfer your personal data outside of the European Economic Area.

Where your personal data is transferred outside the European Economic Area ("EEA"), SEI will ensure that it is protected in a manner that is consistent with how your personal data will be protected in the EEA and that all transfers of personal data outside the EEA are done lawfully. This can be done in a number of ways, for instance, under an agreement which covers the EU requirements for the transfer of personal data outside the EEA, such as the European Commission approved standard contractual clauses.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us using the contact details below.

Please also refer to the Privacy Notice on the SEI website at [www.seic.com/privacy-policy](http://www.seic.com/privacy-policy)

8. You have the right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.
9. You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us using the contact details noted below. We have an obligation to ensure that your personal information is accurate and up to date. Please ask us to correct or remove any information that you think is incorrect.
10. If you have any questions about our privacy policy or information we hold about you please contact us by email at [dataprotection.tpi@titanwh.com](mailto:dataprotection.tpi@titanwh.com) or write to us at Ironstone Place, Kettering, NN14 1FN.