

Mobius Life Limited

Data Privacy Notice



Introduction

This data privacy notice confirms how Mobius Life Limited (referred to hereafter as “our”, “us”, “we” or “MLL”) obtains, manages, uses, retains and destroys personal data which we process as a Data Controller and in compliance with the UK GDPR and other UK data privacy laws.

MLL is a regulated Life Insurance Company. We specialise in providing access to regulated pension products. We provide life insurance policies (“long term contracts of insurance”) and we are processing your personal data during the course of these activities as set out in this data privacy notice.

Personal data is information (hereafter referred to as “data” or “information”), which can identify a living person or living people (known as an individual or individuals), referred to hereafter as either a “data subject”, “you”, “your”, “person”, “persons” “individual” or “individuals”). Examples of the personal data we collect can be your name, your signature, your email address, your address, your phone number, and any other data which will enable us to continue to service the relationship with us.

We have produced this document to explain your rights regarding the data we process and the lawful basis we use to process the data.

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Document Date: 20 March 2021

The topics and information within this document have been referenced to make it easy for you to raise an enquiry should you wish to, or refer to, if you do not understand something.

The contents of this document will be reviewed annually, or more frequently if required due to legislation or regulation.

Contents

Ref.	Topic	Page(s)
1.	Enquiries	3
2.	Complaints	3
3.	Information about our Processing of Personal Data	4
4.	Your Rights and Obligations	6
5.	Further Information	7

1. Enquires

If you have any questions regarding this document or the data we process, our contact details are as follows:

Email: ClientServices@MobiusLife.co.uk

Telephone: +44 (0) 20 7847 3300

Facsimile: +44 (0) 845 268 0200

Address:

Mobius Life Limited

3rd Floor

20 Gresham Street

LONDON EC2V 7JE

2. Complaints

If you have a complaint about the way in which your data is being processed by us, you can contact our Chief Data Officer using the following information:

Email: Compliance@MobiusLife.co.uk

Telephone: +44 (0) 20 7847 3300 and ask to speak to the Chief Data Officer

Address:

Chief Data Officer

Mobius Life Limited

3rd Floor

20 Gresham Street

LONDON EC2V 7JE

You can also complain to the Information Commissioner's Office (ICO):

Website: <https://ico.org.uk/>

Live chat: <https://ico.org.uk/concerns/>

Email: icocasework@ico.org.uk

Telephone Number: 0303 123 1113

Address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

CHESHIRE SK9 5AF

3. Information about our Processing of Personal Data

3.1 Whose personal data does this data privacy notice apply to?

This data privacy notice describes our practices when processing the personal data of individuals who are business contacts, for example consultants and advisers, and trustees of pension schemes.

3.2 How do we obtain your personal data?

We will obtain personal data from the following sources:

- i. **Directly from you:** we collect personal data when you communicate directly with us, such as your name and contact details.
- ii. **From other third parties:** third parties, such as consultants and advisers, may provide personal data about you to us, such as your name, signature and contact details.
- iii. **When personal data is publicly available:** we may collect and combine personal data that is publicly available with information we already hold, for example for verification purposes.

3.3 What personal data do we collect and why?

We will collect, store and use your personal data for the purposes set out in more detail in this section.

Your personal data may be shared with some third parties as set out in more detail below.

- i. **Personal data that we collect:** the categories of personal data that we collect include:
 - Basic identification details, such as your name and signature;
 - Contact details such as your telephone number, email address and postal address;
 - Any correspondence we have with you, including any complaints we receive from you.
- ii. **How we use the personal data we collect:** the purposes for collecting the data include:
 - To provide our services or information to trustees of UK pension schemes and other clients;
 - To facilitate the smooth running of the business through communications, including providing administrative updates to trustees and other third parties;
 - To market our business-to-business contacts / advisory firms;
 - To process and respond to any requests, enquiries or complaints received;
 - To comply with any other contractual, legal and regulatory obligations (including those arising under contracts) and the enforcement of legal claims;
 - For our internal audit purposes and to administer our products and services;
 - To detect or prevent fraud, misuse of services or money laundering;
 - For any other purposes which we will notify you about.

- iii. **Recipients of personal data:** we may disclose the personal data that we collect to third parties, as follows:
- To third parties who are integral to our services, such as representatives, advisory firms and trustees of schemes;
 - To third parties providing services to us, such as our professional advisors (e.g. our external and internal auditors and lawyers);
 - To authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary;
 - To third parties who work on our behalf to service or maintain our IT infrastructure, such as IT suppliers;
 - If we are defending a legal claim your personal data may be transferred as required in connection with a claim;
 - If we discuss selling or transferring part or all of MLL - the personal data may be transferred to prospective purchasers under suitable terms as to confidentiality; and
 - If we are reorganised or sold, personal data may be transferred to a buyer.

3.4 What are our lawful bases for processing your personal data?

The legal options available to us for controlling and processing your data are:

- a) **Consent:** the data subject has given consent to the processing of their personal data for one or more specific purposes, or consent has been given by an authorised person or authorised organisation to provide consent on the data subject's behalf;
- b) **Contract:** processing is necessary for the performance of a contract to which the data subject is party to or in order to take steps at the request of the data subject prior to entering into a contract;
- c) **Compliance with legal obligation:** processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) **Protection of vital interests of the data subject: processing** is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) **Public interest/official authority:** processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and
- f) **Legitimate interest:** processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. The legitimate interests that we would be relying upon as a Controller include the following:
 - providing and improving our services, including understanding and responding to complaints, enquiries and feedback;
 - promoting our business and our brand;
 - developing and maintaining relationships with our business contacts;
 - verifying contact and other details;
 - prevention of fraud and money laundering;
 - network and information security.

3.5 Processing your data

- a) If you are a trustee, or are a business contact, we will generally use option 3.4 (f) ("legitimate interests") to process your data.
- b) In certain circumstances, where an individual does not provide personal data which is required, we will not be able to perform our obligations under the contract with them or may

not be able to provide them with our services. We will make it clear if and when this situation arises and what the consequences of not providing the personal data will be.

3.6 Processing representatives' data ("associates")

- a) If a representative is forwarding your personal data to us, or communicating with us on your behalf, we may use option 3.4 (c) ("Compliance with legal obligation") or 3.4 (f) ("Legitimate interests") depending on the type of personal data.
- b) Representatives have the same rights in respect of their data, providing we can identify them as an individual, so this document is applicable to them as well.

3.7 Marketing

- a) We will only send marketing information to certain representatives or business contacts, such as advisory firms.
- b) We will rely upon option 3.4 (f) ("Legitimate interests") for this marketing activity.
- c) You can opt out of receiving such marketing from us at any time by contacting us at the contact details at page 3.

4. Your Rights and Obligations

You have the following rights and obligations regarding your data which we hold for processing. Some of these rights will only apply in certain circumstances. If you would like to exercise any of these rights, please contact us using the contact details on page 3.

You have the following rights:

- a) **Access:** To ask us if we are processing your personal data and, if we are, request access to the personal data. This entitles you to a copy of the personal data we hold about you and certain other information about it, which will be free of charge;
- b) **Correction:** To request we update/rectify your data if the data we hold is no longer valid or incorrect;
- c) **Erasure:** To request we delete/erase the data we hold on you;
- d) **Restriction:** To request we either stop or restrict the processing of your data;
- e) **Objection:** To object in certain circumstances, such as where your data has been unlawfully processed by us. You can also object to us processing your data, e.g. to sending you marketing material;
- f) **Data portability:** To request us to send your data to another organisation, known as data portability, when it is technically possible for us to do so;
- g) **Automated decision-making:** To understand the logic behind any automated decision-making, including profiling we use, and to object to us using it by automated means;
- h) **Withdraw Consent:** Where we have obtained your consent for a processing activity you have the right to withdraw your consent;
- i) **Complaints to the ICO:** To complain to our data supervisory body, the Information Commissioner's Office. Their contact details are confirmed on page 3.

5. Further Information

The following information may assist you in understanding your rights and the conditions governing your personal data.

5.1 Data Categories:

- a) **Standard Personal Data:** is any information relating to an identified or identifiable natural person, i.e. your data, which is not classified as Special Category Personal Data.
- b) **Special Category Personal Data:** is a type of data deemed to be sensitive to the data subject which include your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning physical or mental health, data concerning a natural person's sex life or sexual orientation.

5.2 Data retention

- a) We will hold your data for the required period permissible by our regulators.
- b) Generally, we will hold/retain your data for six years from the end of the tax year in which our relationship ends unless 5.2(c) or (e) applies, or there is a valid reason to delete/erase it before then.
- c) The Financial Conduct Authority (FCA) prescribes retention periods for holding your data in relation to any pension transfer, pension conversion, pension opt-out or free standing additional voluntary contribution (FSAVC) policies.
- d) The FCA prescribes we hold your data in relation to a pension contract for at least five years, and six years for financial promotions. We classify an application form as a financial promotion.
- e) We may have to hold your data for a longer period for legal or regulatory reasons. We will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

5.3 Where your personal data will be held and outsourcing

- a) Should we decide to transfer ("outsource") the processing of your data, in part or full, to another company either in the UK, the European Economic Area ("EEA"), or a country or territory outside of the UK or EEA which is not subject to an adequacy decision, we review their systems and controls to ensure they can provide a satisfactory level of protection for your rights and freedoms in relation to the processing of your data, and we will ensure that there are safeguards for any data transfers out of the UK in place where these are required, such as Standard Contractual Clauses (SCCs).
- b) If you would like more information on our data transfers and the safeguards we have in place, please contact us using the contact details on page 3 above.

5.4 Data from our website

- a) When you visit our website, we collect personal data during your visit through the use of cookies. We use these cookies for a variety of reasons, most commonly to distinguish you from other users of our website and to help us compile aggregate statistics about the usage of our website.
- b) For more information visit: <https://mobiuslife.co.uk/information/cookies/>