

Momentum Investment Solutions & Consulting (MISC) a division of Momentum Global Investment Management ('MGIM') has issued this Privacy Policy in accordance with the provisions of the Data Protection Act 1998, as may be amended, and the European General Data Protection Regulation 2016/679 (GDPR) which became effective from 25 May 2018, relating to your personal information ('Personal Data').

This Policy explains how we use the personal information we may collect from you, or is provided to us about you or you provide to us when you use our website, visit our offices, enter into a legal contract with us, make use of our services or receive marketing information from us.

We process personal data that we obtain in the context of our business relationship. We also process personal data insofar as necessary to provide our services to you.

We take the privacy of your information seriously and we ask that you read this Privacy Policy carefully as it contains important information on:

- » the personal information we collect about you
- » what we do with your information,
- » who your information might be shared with,
- » how long we retain this information, and
- » what your legal rights are regarding your personal information.

In this document, 'we', 'us' and 'our' refer to MGIM, its subsidiaries, associated and affiliated companies and is addressed to pension managers, pension trustees, investment managers, actuaries, lawyers, independent trustees and other individuals connected with or otherwise acting on behalf of pension schemes or other undertakings (hereafter 'you') with whom we have contracted terms of engagement for the provision of investment consultancy services (hereafter 'Terms of Engagement'), or with whom we interact in the course of delivering and marketing our investment services and solutions.

### Changes to this privacy policy

This Policy deals with how we manage Personal Data which we receive in respect of our relationship with you and may be amended from time to time to reflect changes in our practices regarding the Processing of Personal Data, or changes in applicable law. We reserve the right to amend this Policy at any time without having to obtain your prior consent to such changes. For your assistance we have provided an entry on the Policy of the latest date that it was revised. We urge you to read this Policy carefully, and to review it periodically for changes.

### Information about us

MISC provide advisory services across all aspects of investment policy management, including:

- » Investment strategy
- » Risk management
- » Liability hedging
- » Manager structuring, selection and monitoring
- » Operations management
- » Governance

**Data Controller:** MISC a division of Momentum Global Investment Management is the data controller of Personal Data that you or the entity that you represent provides to us about you.

Company Registration No	03733094
Registered office:	The Rex Building, 62 Queen Street, London EC4R 1EB
Telephone:	+44 (0)1753 342302
Email:	margaret.miles@momentum.co.uk
Websites:	<a href="https://www.momentumgim.co.uk/en/investment-consulting">https://www.momentumgim.co.uk/en/investment-consulting</a>

---

---

## 1. Personal data we collect

We process personal data that we obtain from you in the context of our business relationship or from parties with whom we have entered into Terms of Engagement. We also process – insofar as necessary to provide our service – personal data that we obtain from publicly accessible sources (e.g. FCA registers or Companies House or third party providers of such information). Relevant data is personal information, e.g. name, company name, work and/or home address, work and/or home telephone and/or mobile number, email address, job function and other contact details, and may also include more personal information such as a passport and/or driving licence details.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

## 2. Purposes of data collection

We use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities and services we are engaged to provide to you. In particular, we may collect your personal information for the following purposes:

- » to contact you in response to your enquiry about the services we offer;
- » to provide you with and /or administer the services you request;
- » to provide you with investment updates and information about our forthcoming events and to impart our intellectual capital;
- » to fulfil our contractual, regulatory and compliance obligations, including ‘Due Diligence’ checks; and
- » to facilitate the transfer of your personal information from the party to whom we are contracted to provide consultancy services to other scheme participants as may be required pursuant to our Terms of Engagement or through any other permission given to us.

We may also create Personal Data about you, such as records of your interactions with us in order to monitor and improve our relationship with you.

We will take reasonable steps to ensure that your Personal Data that we process is limited to what is reasonably required for the purposes set out in this Policy.

## 3. Legal bases for using your information

- » Where you make an enquiry, ask a question or request information on a service, agree to receiving marketing communications or report a problem we will rely on lawful bases of processing such as legitimate interest, performance of a contract or compliance with legal obligations, before we use your information.
- » Where you have requested a service or product, the use of your information may be necessary for the performance of the Terms of Engagement we have entered into with you in order to provide those services;
- » Where we have previously collected your information and have used it to send marketing information to you, we may continue to use your information for our legitimate business interests, unless you request us not to do so.

## 4. Disclosure of personal data to third parties

Because of the international nature of our business, we may need to transfer your Personal Data outside the EU to companies within the MMI Holdings Limited group of companies and to third parties. In these cases we will ensure that such transfers take place in accordance with applicable data protection laws and regulations.

## 5. Personal data security

We are committed to keeping the data you provide us secure and have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

All MISC employees and data processors (i.e. those who process your personal data on our behalf, for the purposes listed in Section 2), who have access to, and are associated with the processing of your personal data, are obliged to comply with safeguards to ensure the continued confidentiality and security of your information, and not to use it for any other purpose than to carry out the services that are being performed for you.

You are responsible for ensuring that any Personal Data that you send to us is sent securely.

---

## 6. Keeping your information

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, as set out in this Privacy Policy, and for as long as we are required to keep it by law and in order to fulfil our obligations and exercise our rights.

When determining the relevant retention periods, we will take into account factors including:

- » our contractual and business relationships with you;
- » legal obligations under applicable law to retain data for a certain period of time;
- » statute of limitations under applicable law(s);
- » the likelihood of disputes arising;
- » guidelines issued by relevant supervisory authorities; and
- » additional internal safeguards we have established to restrict access to your Personal Data.

## 7. Information for wider communications

You have choices when it comes to receiving communications from us. We will send you relevant updates about our products and services in a number of ways including by email. You can change your marketing choices at any time:

- » by replying directly to the message; and
- » at any time by contacting us. Refer to the 'Information about us' section.

## 8. Links to other websites

Our website(s) may provide links to other third party websites. These links are provided for your convenience only and you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. MGIM is not responsible for the privacy policies or practices or the content of such external links.

## 9. Your privacy rights

You have several rights with respect to your information which are summarised below. More information on these rights can be found on the Information Commissioner's website: [www.ico.org.uk](http://www.ico.org.uk).

1. The right to access the personal data that we hold about you.
  2. The right to make us correct any inaccurate personal data we hold about you
  3. The right to make us erase any personal data we hold about you. This right will only apply where for example:
    - » We no longer need to use the personal data to achieve the purpose we collected it for.
    - » You withdraw your consent if we're using your personal data based on that consent.
    - » Where you object to the way we use your data, and there is no overriding legitimate interest.
  4. The right to restrict our processing of the personal data we hold about you. This right will only apply where for example:
    - » You dispute the accuracy of the personal data we hold.
    - » You would like your data erased, but we need to hold it in order to stop its processing.
    - » You have the right to require us to erase the personal data but would prefer that our processing is restricted instead.
    - » Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
  5. The right to object to our processing of personal data we hold about you (including for the purposes of sending marketing materials to you).
  6. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to make us transfer this personal data to another organisation
  7. The right to withdraw your consent, where we're relying on it to use your personal data (for example, to provide you with marketing information about our services or products).
-

If you would like to exercise any of your rights mentioned above, you can do so by contacting the investment consulting team by using the details in the 'Information about us' section.

If you have any concerns about the way we process your personal data, or are not happy with the way we've handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

First Contact Team  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF Telephone: 0303 123 1113 or 01625 545745  
Fax: 01625 524510

Issue 1 - May 2018

---