

MAY 2018

Below are a number of popular questions we are getting in regards to GDPR. If you have any further questions please email us at [GDPR@7im.co.uk](mailto:GDPR@7im.co.uk)

Please note that the answers below represent 7IM's interpretation of requirements. We have taken all reasonable care to assess the regulation and put the requirements in the appropriate context for the business which we handle. However, these interpretations should not be considered to be advice and we are not in a position to take responsibility for them and the way in which they relate to your business. Your own compliance functions and support providers, where appropriate, should remain your primary source of assurance on how relevant regulations apply to your business.

## GDPR & 7IM

### 1. What is our relationship under GDPR?

7IM and financial intermediaries each independently control the processing of mutual clients' personal data. That is, we each independently determine as data controllers how, why and in what manner client personal data is processed, without having to request permission from or agree this jointly with the other party.

### 2. What processing activities do 7IM undertake?

We have listed our key processing activities in our Privacy Policy, which can be found on our website <https://www.7im.co.uk/7IM-Privacy-Policy>.

### 3. Do 7IM know all of their data processors? Have the relevant contracts been updated for GDPR?

We have undertaken a review of all of our third party relationships, including those that process data of our behalf. GDPR amendments to relevant contracts have been completed or are in the process of being completed.

### 4. Will there be any GDPR updates to Intermediary Terms of Business before the GDPR effective date?

Our most recent update to our Intermediary Terms of Business included changes required for GDPR. These updates were notified to intermediaries in November 2017.

### 5. Will there be any GDPR updates to Client Terms & Conditions before the GDPR effective date?

Our most recent update to our Client Terms & Conditions included changes required for GDPR. These updates were sent out to clients in December 2017.

For further information, see section 8 of the General Terms and Conditions.

<https://www.7im.co.uk/financial-intermediary/regulatory-and-legal/terms-and-conditions>

## Data Security (including Cyber Security) & Integrity

### 6. What are the security measures that 7IM have in place to protect personal data?

We utilise a variety of hardware, software and procedural measures to ensure that personal data is protected. These include but are not limited to, enterprise firewalls, endpoint protection, two factor authentication, 24/7 cyber monitoring service, staff cyber training, strict access controls and a penetration testing program.

### 7. Have 7IM completed any integrity checks on the personal data?

We are in the process of completing integrity checks of personal data held. We are taking a risk based approach to this exercise by prioritising key personal data items such as name, address, bank details and National Insurance number.

### 8. What about sending personal data via email?

We are aware of the risks of sending personal data via email. We have defined internal rules which help to improve the security of emails and attachments, including encrypting the transmission of the message.

### 9. Are there any further security measures that can be implemented for communicating personal data?

We can automatically encrypt emails from us to your domain – if you need any assistance in getting this configured, please email us at [information@7im.co.uk](mailto:information@7im.co.uk).

Email attachments should be password protected and the password distributed via a separate email.

## Privacy Policy

### 10. Have 7IM made any updates to their Privacy Policy as a result of GDPR?

Whilst we have made some updates to our Privacy Policy, we have not changed the way in which we handle the personal data we process.

### 11. Where can I find a copy of the privacy policy?

Our updated Privacy Policy can be found on our website <https://www.7im.co.uk/7IM-Privacy-Policy>

## Data Retention

### 12. How long does 7IM retain personal data for?

We will continue to abide by legal and regulatory requirements, including FCA rules, relating to the retention of data, as defined in our data retention policy.

## Deleting Personal Data

### 13. How do I request the deletion of personal data (the right to erasure)?

Requests for the deletion of data should be addressed to our Chief Operating Officer. They should be made by via letter to our registered address or via email to [information@7im.co.uk](mailto:information@7im.co.uk)

Each request will be reviewed against GDPR requirements and our data retention policy, and we will comply unless there is a lawful reason for not doing so. The data subject will be notified if we can delete the data or if we have to retain it.

## Data outside the EEA

### 14. Do 7IM send any personal data outside of the EEA?

Our main office and data centres are located in the UK and the majority of our processing activities take place here. We or our third party suppliers may in some circumstances transfer personal data outside the EEA. If this occurs, we will take steps to ensure that such a transfer is in accordance with applicable data protection laws.

## Data Breaches

### 15. Do 7IM have a GDPR compliant data breach policy?

We have updated our data breach policy to be GDPR compliant. In summary:

- it re-confirms the process for reporting a breach and outlines some scenarios we would expect to be reported;
- it has been distributed internally to all staff members; and,
- it enhances an existing breach process which has been established for a number of years and will continue to be reviewed by our Cyber Security Committee.

### 16. Would 7IM notify the financial adviser of a personal data breach involving mutual clients?

Yes - where the breach is reportable to the ICO, we would provide relevant information and work with the financial adviser to try to minimise client detriment and, for example, protect clients from any fraudulent attempts that may arise in connection with the breach.

### 17. Should the financial adviser notify 7IM of a personal data breach involving mutual clients?

Yes - where the breach is reported to the ICO, so that we can work together to try to minimise client detriment and, for example, protect clients from any fraudulent attempts that may arise in connection with the breach.

## Data Protection Officer

### 18. Have 7IM appointed a Data Protection Officer (“DPO”)?

No. We have considered the criteria under GDPR which make the appointment of a DPO mandatory within an organisation, and have determined that this is not required for 7IM.

Our Chief Operating Officer will continue to hold responsibility for all data protection and privacy matters.

### 19. Who should I contact?

Please refer to our Privacy Policy for details of how to contact our Chief Operating Officer <https://www.7im.co.uk/7IM-Privacy-Policy>.