

# VOYA INVESTMENT MANAGEMENT (UK) LIMITED

## Personal Information Notice

Voya Investment Management (UK) Limited wants you to be familiar with how we collect, use and disclose personal information. This Notice describes our practices in connection with personal information that we collect in the course of providing services to you.

### PERSONAL INFORMATION

**"Personal Information"** is information that identifies you as an individual or relates to an identifiable individual. Personal Information we may collect includes:

- Name
- Postal address
- Telephone number
- Email address
- Financial account information

### Collection of Personal Information

We may collect Personal Information in a variety of ways, including: From you, when you visit or call our offices, when you send us an email message, when you sign on as a client, when you use our services, or when you fill out an agreement with us.

- From other sources, such as publicly available databases or our affiliates, when they share the information with us;

We need to collect Personal Information in order to provide the requested services to you. If you do not provide the information requested, we may not be able to provide the services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Notice.

### Use of Personal Information

We may use Personal Information for legitimate business purposes including: **Providing the functionality of the services and fulfilling your requests.**

- To provide the services' functionality to you, such as arranging access to your registered account, and providing you with related customer service.
- To respond to your inquiries and fulfill your requests, for example, when you contact us with questions, suggestions, compliments or complaints, or when you request other information about our services.
- To complete your transactions, and provide you with related customer service.
- To send administrative information to you, such as changes to our terms, conditions and policies.

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- **Aggregating and/or anonymizing Personal Information.**
  - We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.
- **Accomplishing our business purposes.**
  - For data analysis, for example, to improve the efficiency of our services;
  - For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements;
  - For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
  - For developing new products and services;
  - For enhancing, improving, or modifying our current products and services;
  - For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our clients; and
  - For operating and expanding our business activities, for example, understanding which parts of our services are of most interest to our clients so we can focus our energies on meeting our clients' interests.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

## **Disclosure of Personal Information**

We may disclose Personal Information as follows:

- To the following affiliates for the purposes described in this Notice: Voya Investment Management LLC in the United States.
- To our third party service providers, to facilitate services they provide to us. These can include providers of services such as data analysis, transaction processing, information technology and related infrastructure provision, customer service, auditing, and other services.

## **Other Uses and Disclosures**

We may also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law and regulations, which may include laws outside your country of residence.
- To cooperate with public and government authorities, including law enforcement, in order to respond to a request or to provide information we believe is important. These can include authorities outside your country of residence.
- To enforce our terms and conditions and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

## **SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization.

## **How you can access, change or delete your Personal Information**

If you would like to request to review, correct, update, suppress, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us at: [VoyaIMGDPR@voya.com](mailto:VoyaIMGDPR@voya.com). We will respond to your request consistent with applicable law. You also may lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you initiate a transaction, you may not be able to change or delete the Personal Information provided until after the completion of such transaction).

## **RETENTION PERIOD**

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using the services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

## **JURISDICTION AND CROSS-BORDER TRANSFER**

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your Personal Information. You may obtain a copy of these measures by contacting us as described in the 'Contacting Us' section below.

## **SENSITIVE INFORMATION**

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health,

biometrics or genetic characteristics, criminal background or trade union membership) on or through our services or otherwise to us.

## **CONTACTING US**

Voya Investment Management (UK) Limited, located at 35 King Street, London EC2V 8EH, is the company responsible for collection, use and disclosure of your Personal Information under this Notice.

If you have any questions about this Notice, please contact us at [VoyaIMGDPR@voya.com](mailto:VoyaIMGDPR@voya.com), or 35 King Street, London EC2V 8EH.