

The Office of Financial Sanctions Implementation: Asset Reporting Privacy Policy

This notice sets out how we will use your personal data provided to us under Regulation 70A of The Russian (Sanctions) (EU Exit) Regulations 2019. This notice also explains your relevant rights under the UK General Data Protection Regulation (UK GDPR). For the purposes of the UK GDPR, HM Treasury is the data controller for any personal data you provide.

Data Subjects

Designated persons subject to UK Financial Sanctions.

The type of personal information we collect

Personal data means any information from which a living individual can be identified. The personal data will be provided by you in compliance with your legal obligations to report UK assets owned. The types of personal data collected will include your:

- name
- email address
- residential addresses
- financial information

Other personal data collected will be apparent through your submission of assets.

How we use your personal data

OFSI will use the personal data in the performance of its public task to ensure financial sanctions are understood, implemented and enforced in the UK. This includes:

- maintaining records of assets held by Designated Persons
- issuing licences under sanctions legislation for acts which would otherwise be breaches of sanctions
- investigating and taking enforcement action on suspected breaches of financial sanctions including breaches of “the reporting obligations”

Our Lawful Basis for processing your personal data

The lawful basis we are relying on to process the personal data is Article 6(1)(e) of the UK GDPR; 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.

Who will have access to your data

Your personal data will only be made available to Economic Crime and Sanctions staff within HM Treasury, who have a business need to see it for the purposes of sanctions implementation and enforcement.

Personal data may also be shared with third parties for law enforcement purposes and to assist them in delivering their statutory functions. When we do this, it is with due regard to our obligations under the UK GDPR and Data Protection Act 2018, including ensuring any disclosures are necessary and proportionate with appropriate safeguards in place. This includes sharing data with:

- law enforcement agencies (in the UK and overseas) to support the prevention of crime or for national security purposes
- Foreign, Commonwealth & Development Office (FCDO) and other government departments as necessary for them to deliver their statutory duties and public functions; and
- other bodies or individuals where we are required to do so by law

As the personal data is stored on our IT infrastructure, it will be accessible to our IT service providers. They will only process this personal data for our purposes and in fulfilment with the contractual obligations they have with us.

How long we hold your personal data for

The personal data provided will be kept for no longer than is necessary for the exercise of our functions and will be subject to regular review. Personal data relating to designated persons is retained for the lifetime of the designation to support future decision making and enforce penalties.

Contact us

For more information on how we use your personal data, please contact us at:

Office of Financial Sanctions Implementation HM Treasury 1 Horse Guards Road
London SW1A 2HQ United Kingdom

Email: ofsi@hmtreasury.gov.uk

Web: www.gov.uk/ofsi

Your data protection rights

You have the right to:

- request information about how we process your personal data and request a copy of it
- object to the processing of your personal data
- request that any inaccuracies in your personal data are rectified without delay
- request that your personal data are erased if there is no longer a justification for them to be processed
- complain to the Information Commissioner's Office if you are unhappy with the way in which we have processed your personal data

A full list of your data protection rights appears on the ICO website <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>

How to submit a data subject access request (DSAR)

To request access to your personal data that HM Treasury holds, please email: dsar@hmtreasury.gov.uk

Complaints

If you have concerns about our use of your personal data, please contact Treasury's Data Protection Officer (DPO) in the first instance at: privacy@hmtreasury.gov.uk

If we are unable to address your concerns to your satisfaction, you can make a complaint to the Information Commissioner at casework@ico.org.uk or via this website: <https://ico.org.uk/make-a-complaint>.