



Privacy Notice

The Pensions Platform

Privacy Notice

We are dedicated to protecting the confidentiality and privacy of information entrusted to us in accordance with the UK General Data Protection Regulation (GDPR), the UK Data Protection Act 2018 and those laws relating to Data Protection and privacy in the UK. This Privacy Notice (together with our [cookies policy](#) and [terms of use](#)) sets out how we obtain, use, store and dispose of your personal data as well as explaining your rights.

This Privacy Notice sets out how we will use your personal data when we are acting as a data controller (someone who determines what data to collect and how to use it). We may also use your personal data when acting as a data processor (acting on instructions given by the data controller – our clients (e.g. your employer or pension scheme)). You should therefore also read the Privacy Notice of your employer and/or pension scheme as this will also govern the use of your Personal Data.

Any updates to how we use your data will be explained on this page.

1. Who are we?

This Privacy Notice applies to Isio Group Ltd, Premier Pensions Management Limited and any entity controlled by it and any entity under common control with Isio Group Ltd as well as any of our employees acting in their individual capacity as Scheme Actuary (“we” or “us”).

“You” and “user” means the person about whom we hold the data.

2. How do we collect personal data?

- **Directly** - We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who provide us with their business card(s), complete our online forms, subscribe to our newsletters, sign up for marketing, register for events/meetings, visit our offices or for recruitment purposes. We may also obtain personal data directly when, for example we are establishing a business relationship, performing professional services through a contract, or through hosted software applications. If you are a Premier Wealth Planning customer you can find out more about how we use your data [here](#).
- **Indirectly** - We obtain personal data indirectly about individuals from a variety of sources including recruitment services, your employer/former employer and pension scheme trustees.
- **Public Sources** – Personal data may be obtained from public registers, news articles, sanctions lists and internet searches.
- **Social and Professional Networking Sites** – If you register or login to our websites using social media (e.g. LinkedIn or Twitter) to authenticate your identity and connect your social media login information with us, we will collect information or content needed for the registration or login that you permitted your social media provider to share with us. That information may include your name and email address and depending on your privacy settings, additional

details about you, so please review the privacy controls on the applicable service to set how much information you want shared with us.

- **Recruitment Services** – We may obtain personal data about candidates from an employment agency and other parties include former employers and credit reference agencies. You can find out more about how we process your data on our recruitment website [here](#).

3. What categories of personal data do we collect?

We may obtain the following categories of personal data about you through direct interactions with us, or from information provided by your employer.

- **Personal data.** Here is a list of some of the personal data we commonly collect to conduct our business activities.
 - Contact details (e.g., name, company name, job title, work and mobile telephone numbers, work and personal email and postal address)
 - Other unique identifiers (e.g., date of birth, national insurance number)
 - Identification information such as driving licence, birth/marriage certificates and utility bills
 - Professional details (e.g., job and career history, educational background and professional memberships, published articles).
 - Family and beneficiary details (e.g., names and dates of birth).
 - Financial information (e.g., remuneration, pension amounts, taxes, payroll, investment interests, assets, bank details).
 - CCTV at our sites may collect images of visitors. Our policy is to automatically overwrite CCTV footage within 30 days.
- **Sensitive personal data.** We limit collecting sensitive or special categories of personal data about individuals other than our own employees. When we do need to process sensitive personal data from individuals who are not our employees we do so with the express consent of the individuals or as required by law. Examples of sensitive personal data we may obtain, or otherwise hold, include:
 - Personal identification documents that may reveal race, sexuality, religion or ethnic origin, biometric data of private individuals, beneficial owners of corporate entities, or applicants.
 - Adverse information about potential or existing clients and applicants that may reveal criminal convictions or offences information.

- Information provided to us by our clients in the course of a professional engagement for example ill-health data in order for us to determine benefits due to you from a pension scheme which we advise or as part of our insurance advisory work.
- Diversity and equal opportunity information volunteered by participants in certain professional programmes and recruitment processes.
- **Child data.** Although we do not intentionally collect information from individuals under 13 years of age, we may occasionally receive details about children attending events we host with their parents or guardians or as beneficiaries of pension scheme members or policies.

4. What lawful reasons do we have for processing personal data?

We may rely on the following lawful reasons when we collect and use personal data:

- **Contract** – We may process personal data in order to perform our contractual obligations owed to (or to enter into a contract with) the relevant individuals.
- **Consent** – We may rely on your freely given consent at the time you provided personal data to us.
- **Legitimate interests** – We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. These may include delivering the professional services our clients have engaged us to provide or to deliver timely marketing insights and speciality knowledge we believe is welcomed by our business contacts.
- **Legal obligations** – We may process personal data in order to meet our legal and regulatory obligations or mandates.
- **Substantial public interest** – We may process personal data for reasons of substantial public interest.

Your employer and/or pension scheme trustees may rely on other lawful reasons as laid out in their Privacy Notice.

5. Why do we need personal data?

- We collect and process your personal data for the following purposes: Providing actuarial services to our clients.
- Providing a quality and professional service. We may process personal data when reviewing client files for quality assurance purposes.
- Promoting our services, products and capabilities to existing and prospective business clients.

- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- Personalising online landing pages and communications we think would be of interest.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Authenticating registered users to certain areas of our sites.
- Seeking qualified candidates and forwarding candidate career enquiries to our human resources team, you can find out more [here](#).
- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.
- Contacting journalists regarding company press releases, invitations to annual press parties, highlighting messages that may be of interest on specific industry topics.
- Complying with legal and regulatory obligations including maintaining appropriate audit trails, anti-money laundering, terrorist financing, fraud and other forms of financial crime.
- Compiling health and safety data following an incident or accident.

6. Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. These recipients are contractually bound to safeguard the data we entrust to them. We may engage with several or all of the following categories of recipients:

- Parties that support us as we provide our services (e.g., providers of telecommunication systems, mailroom support, IT system support, archiving services, document production services and cloud-based software services).
- Our professional advisers (including but not limited to lawyers, auditors and insurers) and other advisors appointed by the pension scheme trustees and/or your employer.
- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of our business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it.
- Payment services providers.

- Price comparison websites and similar companies that offer ways to research and apply for financial products and services where we are engaged to provide this service to our clients
- Marketing service providers.
- Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation.
- Recruitment service providers.

7. Do we transfer your personal data outside the UK?

We store most of our data in the UK. We may transfer personal data to reputable third-party organisations situated inside or outside the UK when we have a business reason to engage these organisations.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Further details on this are available on request using the contact details set out in section 13 below.

8. What about personal data security?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data.

You remain responsible for keeping your user ID and password confidential. Please be aware that the transmission of data via the internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

9. How long do we retain personal data?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. Any personal data processed as part of a client engagement will be retained for as long as instructed by our client. At the end of any engagement with our clients we will retain one copy for our legal and compliance purposes including to demonstrate compliance with regulatory rules, to demonstrate that we have met our contractual and legal obligations and to establish, exercise or defend legal claims.

We may also retain your data to comply with applicable laws, regulations and professional obligations that we are subject to.

We retain such personal data for seven years, unless a different time frame applies as a result of business need or specific legal, regulatory or contractual requirements. Further details on this are available on request using the contact details set out in section 13 below.

10. Do we link to other websites?

Our websites may contain links to other sites. Please review the destination websites' privacy notices before submitting personal data on those sites. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

11. Do we use cookies?

Our websites may use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. To learn more, please refer to our [Cookies Notice](#).

12. What are your data protection rights?

- **Access** – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- **Correction** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- **Erasure** – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it and no longer have the right to hold it.
- **Processing restrictions** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.

- **Data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.
- **Automated Individual Decision-making** – You can ask us to review any decisions made about you which we made solely based on automated processing, including profiling, that produced legal effects concerning you or similarly significantly affected you.
- **Right to Object to Direct Marketing including Profiling** – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.
- **Right to Withdraw Consent** – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

13. Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Notice, how we handle personal data, please direct your correspondence to: Isio Group Ltd, Data Privacy Office, c/o SPS, PO Box 721, Salford, M5 0QT or email dataprivacy@isio.com.

We aim to respond within 30 days from the date we receive privacy-related communications.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

You may contact the UK Information Commissioner's Office at <https://ico.org.uk/concerns/handling/> to report any concerns you may have about our data handling practices. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance using the contact details set out in this section.

14. Do we change this Privacy Notice?

We regularly review this Privacy Notice and will post any updates to it on this website.

