

PRIVACY POLICY

Introduction & Who We Are

Welcome to the privacy policy of Inside Pensions Ltd (trading as Inside Pensions).

Purpose of this privacy policy

In this Policy we describe how Inside Pensions collects and processes personal information in the management and operation of our business, when you use our professional services and/or by your use of our website. In this policy we set out the conditions under which we may process any information that we collect from you or that you provide to us.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

The Data Controller – Who We Are

When providing professional services to our clients, we act on our clients' instructions in our capacity as a processor of client data. We also act as a controller in respect of certain other aspects of our business.

When acting as a controller, Inside Pensions Ltd (trading as Inside Pensions) is responsible for your personal data (collectively referred to as “**Inside Pensions**”, “**we**”, “**our**”, or “**us**”).

Our company registration number is: 06664240, and our registered head office is located at First Floor, Trident House, 42-48 Victoria Street, St Albans, Hertfordshire, England, AL1 3HZ.

Our Contact Details

There are many ways you can contact us, including by phone, email and post:

| Method of Contact | Contact Details |
|-------------------|--|
| E-Mail Address | gdpr@insidepensions.com |
| Phone Number | 01727 733150 |
| Post | Data Protection Queries Inside Pensions First Floor, Trident House 42-48 Victoria Street St Albans Hertfordshire AL1 3HZ |

You have the right to make a complaint at any time about how we process your personal data, to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

[Changes to the privacy policy and your duty to inform us of changes](#)

We keep our privacy policy under regular review. This version was last updated on 26 January 2021.

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

[Third-party links](#)

This website may from time to time contain links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

INSIDE PENSIONS AS A CONTROLLER

The Data We Collect From You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

1. **Identity Data**, which includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
2. **Contact Data**, which includes billing address, delivery address, email address and telephone numbers.
3. **Financial Data**, which includes bank account details.
4. **Transaction Data**, which includes details about payments to and from you and other details of products and services you have purchased from us.
5. **Technical Data**, which includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
6. **Profile Data**, which includes the nature, type and frequency of your use of our services, your interests, preferences, feedback and survey responses.
7. **Marketing and Communications Data**, which includes your preferences in receiving marketing from us and our third parties and your communication preferences.
8. Your correspondence and communications with us including feedback and survey responses.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If You Fail To Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How Your Personal Data Is Collected

We use different methods to collect data from and about you including through the following means:

Direct & indirect interactions.

- You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you and/or the business that you work for do any of the following:
 - enquire about our products or services, and/or engage with us in any related interactions and communications;
 - provide to us your instructions for Inside Pensions services;
 - engage in ongoing communications in respect of services provided / that we provide to you, including any follow-up services and/or post-service communications;
 - subscribe to our service or publications;
 - request marketing to be sent to you; or
 - give us feedback or [contact us](#) for any other reason.

Third parties or publicly available sources

We will receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google based outside the UK.
- Identity and Contact data obtained via the contact us feature on our website.
- Identity and Contact Data from publicly available sources including Companies House, HM Land Registry, local authority planning portals, estate gazettes and/or equivalent services, AML online searches, third party publications, property platforms and the Electoral Register.

How Your Personal Data Is Used

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you to provide professional services, including our provisions of secretariat and project management services to Trustee Boards and Companies, except to the extent that Inside Pensions is acting as a processor only.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by contacting us.

Purposes For Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|---|---|
| To register you as a new client | (a) Identity (b) Contact | (a) Performance of a contract with you (b) Necessary for our legitimate interests |
| To process and deliver your order for our professional services including: (a) Provide our professional services to you; | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|---|--|--|
| (b) Manage payments, fees and charges; and (b) Collect and recover money owed to us | | |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey; (c) protecting you, maintaining your safety, health and welfare; (d) handling client contacts, queries, complaints or disputes; | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services) |
| To comply with our legal and regulatory obligations, including: (a) preventing, investigating and detecting crime, fraud or anti-social behaviour; (b) prosecuting offenders, including working with law enforcement agencies; (c) effectively handling any legal claims or regulatory enforcement actions taken against us; (d) Querying against other publicly available personal data, including public records. | (a) Identity (b) Contact (c) Profile | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests as providers of a regulated service. |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance and security, | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of Trustee Executive services, network security, to prevent fraud and in the |

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|--|---|--|
| support, reporting and hosting of data) | | context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation. |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Technical | Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, client relationships and experiences | (a) Technical (b) Usage | Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about other services that may be of interest to you | (a) Identity (b) Contact (c) Technical (d) Profile (e) Marketing and Communications | Necessary for our legitimate interests (to develop our products/services and grow our business, which, if you are an individual, will include reliance on the soft opt-in principle (in accordance with Regulation 22 of The Privacy & Electronic Communications (EC Directive) Regulations 2003). |

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract, or until you cease visiting our website and subject to our data retention policy.

Information We Process With Your Consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, our products and services, you provide your consent to us to process information that may be personal information.

We aim to obtain your consent to process this information, for example, by asking you to agree to our use of cookies. We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by contacting us using the contact details above.

How We Protect Your Data And Maintain Your Privacy

We are committed to keeping your personal data safe and secure. Our security measures include the following:

- encryption of data via SharePoint;
- implementing risk management and data impact assessment analysis;
- regular cyber security assessments of all service providers who may handle your personal data;
- security controls which protect our IT infrastructure from external attack and unauthorised access, including the use of antivirus and antispyware specialist software, two-factor authentication, password protections and Windows security policies;
- internal policies setting out our data security approach and training for staff;
- a granular approach to information-access; and
- regarding our service providers and suppliers, in order to make certain services available to you, we may need to share your personal data with some of our service partners, these can include, cloud storage and IT providers. We only allow service providers to handle your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security, which mean they can only use your data to provide services to us and to you, and for no other purposes.
- Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to Clients for quality purposes, which may involve processing personal data stored on the relevant Client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to Client engagements.

Aside from our service providers and other legal entities within our group, we will not disclose your personal data to any third party unless we are legally obliged to do so. We will never sell or rent our client data to other organisations for marketing purposes.

We may share your data with Governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers to:

- comply with our legal obligations;
- exercise our legal rights (for example in court cases);
- assist in the prevention, detection, investigation of crime or prosecution of offenders; and
- assist in the protection of our employees and clients.

To deliver a full range of services to you, it may be necessary for us to share your data outside of the UK. This will typically occur when service providers, e.g. cloud services, are located outside the UK or if you are based outside the UK. These transfers are subject to special rules under data protection legislation and regulations. If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure. Our standard practice will be to use 'standard data protection clauses' which have been approved by the European Commission (and/or to the extent applicable, the UK) for such transfers. Those clauses can be accessed from the link below:

http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm

How Long We Hold Your Personal Data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

We have a legal obligation to ensure we do not retain your data for longer than necessary for the purposes set out in this notice. Different retention periods apply for different types of data.

Please contact us if you should require a copy of our data retention policy.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

COOKIES POLICY

What Is A Cookie?

Cookies are small pieces of data, stored in text files, that are stored on your computer or other device when websites are loaded in a browser. They are widely used to remember you and your preferences, whether for a single visit to a website or for multiple repeat visits.

They ensure a consistent and efficient experience for visitors, and perform essential functions such as allowing users to register and remain logged in. Cookies may be set by the site that you are visiting or by third parties, such as those who serve content or provide advertising or analytics services on the website.

Why Are Cookies Used?

Cookies are a convenient way to carry information from one session on a website to another, or between sessions on related websites, without having to burden a server machine with massive amounts of data storage. Storing the data on the server without using cookies would also be problematic because it would be difficult to retrieve a particular user's information without requiring a login on each visit to the website.

If there is a large amount of information to store, then a cookie can simply be used as a means to identify a given user so that further related information can be looked up on a server-side database. For example, the first time a user visits a site they may choose a username which is stored in the cookie, and then provide data such as password, name, address, preferred font size, page layout, etc. – this information would all be stored on the database using the username as a key. Subsequently when the site is revisited the server will read the cookie to find the username, and then retrieve all the user's information from the database without it having to be re-entered.

What Cookies are Used?

| Type of Cookie | Purpose | Length of Time Until Erased |
|----------------|--|--|
| Marketing | Marketing cookies are used to track visitors across our website. We achieve this through the use of Google analytics cookies | The cookie expires after 2 years from the date it was last refreshed. Every time a new hit is sent to google analytics, the cookie is refreshed. |

How Secure are Cookies?

There is a lot of concern about privacy and security on the internet. Cookies do not in themselves present a threat to privacy, since they can only be used to store information that the user has volunteered or that the web server already has. Whilst it is possible that this information could be made available to specific third-party websites, this is no worse than storing it in a central database. If you are concerned that the information you provide to a web server will not be treated as confidential then you should question whether you actually, need to provide that information at all.

How To Manage Cookies

If using Internet Explorer, for example you select Tools then choose Internet Options. On the general tab you will see a section titled Browser History. Click Settings then choose View Files.

If you're using a browser other than Internet Explorer, you can visit the following cookie pages on each browser Web site to find out how to manage your cookies when using Firefox, Opera, or Safari.

- Microsoft Internet Explorer: [Delete and manage cookies](#)
- Microsoft Edge: [Delete cookies](#)
- Mozilla [Firefox: Help: Firefox's Cookie Options](#)
- Opera: [Web preferences](#)
- Apple Safari: [Manage cookies and website data in Safari on Mac](#)
- Google Chrome: [Turn cookies on or off](#)

Disabling Cookies

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

INSIDE PENSIONS AS DATA PROCESSOR

1. This privacy statement applies to personal data provided by our Clients to us in accordance with our provision of the Trustee Executive Services subject to our Consultancy Services Agreement. For the purposes of providing Trustee Executive Services we are acting as a Data Processor only.
2. In our capacity as a processor, we use personal data for the purpose of providing secretariat and project management services to Trustee Boards and Companies. Some of our services require us to process personal data on behalf of our Clients.
3. When collecting and using personal data in our capacity as processor, we will do so in accordance with the instructions of our Client.
4. Our policy is to collect only the personal data necessary for agreed purposes and we ask our Clients to only share personal data where such sharing cannot be avoided and/or is deemed necessary by our Client for a particular purpose.
5. Where we need to process personal data to provide professional services, we ask our Clients to provide the necessary information to the data subjects regarding its use.

Data retention

6. We store and retain the personal data processed by us in accordance with our Client's instructions.
7. We will promptly delete or return (at a Client's election) all personal data when it no longer needs to retain it for the purposes set out in the Consultancy Services Agreement.

Data Subjects' Rights

8. Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. For the purposes of client personal data provided to Inside Pensions in our provision of the Trustee Executive Services, we are not a data controller and therefore we are not responsible for providing access to data subjects of any personal data we process in this capacity and in accordance with Client's instructions.
9. In respect of rights of access, rectification or erasure, to restrict or object to processing of personal data, or to data portability – if a data subject makes a written request to us to exercise any of the rights, we shall not respond to that request, but shall immediately pass the request to the Client.