

PRIVACY NOTICE

Our privacy notice explains how we look after your personal data.

WHO ARE WE?

Excel Pensions Ltd is a private limited company incorporated in England and Wales with company number 08924433 and is a 'controller' under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

WHAT INFORMATION DO WE COLLECT?

We may hold data about the following people:

- Employees
- Customers & Clients
- Suppliers and Service Providers
- Advisers, Consultants and other Professional Experts
- Complainants and Enquiries

We will only collect both the personal and business information that is relevant to the matter that we are dealing with. In particular we may collect the following information from you which is defined as 'personal data'

- Personal details
- Financial details
- Business activities of the person whose details we are processing
- and information relating to the company that will be acting as the sponsoring employer to the pension scheme

Most of the information will have been provided by you, but we may also collect information from professional advisers connected to you, such as your accountant, but this will always be with your approval. We will also ask you to provide identification to comply with anti -money laundering requirements.

BASIS FOR PROCESSING

The basis on which we process your personal data is one or more of the following:

- It is necessary for the performance of our contract with you
- It is necessary for us to comply with a legal obligation
- It is in our legitimate interests to do so
- You have given us your consent (this can be withdrawn at any time by advising our data protection office)

WHAT DO WE DO WITH THE INFORMATION WE COLLECT?

Primarily, we use the information to process and establish the company pension scheme for the benefit of the members who will be admitted to the scheme. We will use this information to provide you with annual updates on your company pension scheme, and to communicate with you with regards to any on-going aspects of the running of your company pension scheme.

We may also need to provide this information to the regulators if requested to do so, the current regulators of company pension schemes being The Pensions Regulator and HMRC.

HOW DO I CONTROL MY PERSONAL INFORMATION

You can control your personal information in a number of ways, including asking us to correct or update your or the company information that we hold on file at any time. Where we have provided you information to one of our associated companies or trusted partners which will have been provided to help support various aspects of establishing your company pension and planning needs, you may object to this at any time and request that we do not provide this to these companies and trusted partners in the future.

If you wish to withdraw any consent you have previously given, or give consent where you have previously denied it, please just contact us. You can contact us at any time by writing to us Stone House, Stone Road Business Park, Stoke-on-Trent, Staffordshire, ST4 6SR. Or you may contact the Data Protection Officer, by email: shirley@excelpensions.uk

SHARING YOUR INFORMATION WITH THIRD PARTIES

We will not share your information with anyone outside the Excel Group except:

- Where we have your permission
- Where required to establish your company pension scheme
- With third party companies that provide your pension scheme with benefits or services, such as investment companies that you have instructed us to deal with
- Where we are required to by law, and with regulatory bodies
- Where required for a proposed sale of any pension scheme asset, reorganisation, transfer, asset disposal or other transaction relating to the running of your company pension scheme.
- In the event that an additional member is added to the scheme, then we will share with them all information related to the scheme

HOW LONG DO WE HOLD YOUR INFORMATION?

We will hold your information for as long as you continue to maintain a pension scheme with us, as we would be unable to maintain your account without it.

In the event that you close/transfer your pension to another provider, then will maintain a record of your scheme for at least 6 years or as directed by the regulators and legal requirements.

Where you have provided personal information in relation to an enquiry about a company pension with Excel Pensions then we will hold this information no longer than 3 months from the date of the initial enquiry. If you have not proceeded with a full application at this point, then this information will be permanently deleted from our records.

TRANSFERRING INFORMATION OVERSEAS

Most of the information we hold will be used and stored in the UK. However, we may transfer information to an overseas jurisdiction as part of our standard back up procedures, or where you have requested us to deal with an overseas third party. We will make sure that any transfer to another country is legal and that your information is always kept safe.

SECURITY ARRANGEMENTS

- We shall ensure that all information that you provide to us is kept secure using appropriate technical and organisational measures
- In the event of a personal data breach we have in place procedures to ensure the effects of such a breach are minimised and shall liaise with the ICO and with you where appropriate
- More information is available from our data protection officer

COMPLIANCE WITH THE DATA PROTECTION ACT

We comply with the principles of the GDPR and the Data Protection Act 2018 by taking all reasonable steps to ensure that:

- Personal data is only used when it is fair and lawful to do so.
- Personal data that is obtained is for a lawful reason only and not processed for any incompatible purpose.
- Only necessary personal and company data will be gathered.
- Personal data held will be accurate and kept up to date.
- Personal data will not be held longer than necessary.
- Individuals can access their data in accordance with their rights.
- Personal data will be held safely and securely
- Personal data will only be transferred overseas providing proper protections are in place.

YOUR RIGHTS

You have the following rights under the GDPR:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object
- Rights concerning automated decision-making and profiling

RIGHTS OF ACCESS

You have a right to see the information we hold about you.



You can ask for a copy of the data that we hold on you by making a “subsequent access request” and providing us with proof of identity. If you wish to make such a request please write to:

The Data Protection Office
Stone House
Stone Road Business Park
Stoke-on-Trent
Staffordshire
ST4 6SR

We will usually process your request free of charge and within 30 days however we reserve the right to charge a reasonable administration fee and to extend the period of time by a further two months if the request is manifestly unfounded or vexatious and/or is very complex.

More information is available from our Data Protection Officer.

RIGHT TO ERASURE

You have the right to ask us to erase your personal data in certain cases (details may be found in Article 17 of the GDPR).

We will deal with your request free of charge and within 30 days but reserve the right to refuse to erase information that we are required to retain by law or regulation, or that is required to exercise or defend legal claims.

To exercise your right to erasure please contact our Data Protection officer.

WHO CAN YOU COMPLAIN TO?

If you are unhappy about how we are using your information or how we have responded to your request then initially you should contact the Data Protection Office, Shirley Jepson (shirley@excelpensions.uk)

If your complaint remains unresolved then you can contact the Information Commissioner’s Office, details available at www.ico.org.uk