

Pension Insurance Corporation Plc Marketing Privacy Notice

Introduction

Welcome to the Pension Insurance Corporation Plc's privacy notice.

Pension Insurance Corporation respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you are signed up to receive marketing communications from us and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Pension Insurance Corporation collects and processes your personal data when you are signed up to receive marketing communications from us.

We do not market to children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

Pension Insurance Corporation plc is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Pension Insurance Corporation plc

Name or title of DPO: Louise Inward

Email address: dataprotection@pensioncorporation.com

Postal address: 14 Cornhill, London, EC3V 3ND

Telephone number: 0207 105 2000

You have the right to make a complaint at any time 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 notice and your duty to inform us of changes

This version was last updated on 23 July 2019 and historic versions can be obtained by contacting us.

The data protection law in the UK changed on 25 May 2018; this privacy notice sets out most of your rights under the new laws.

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.

2. The data we collect about 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:

- **Contact Data**, such as name, title, Company name, email address, address and telephone numbers. Where these are provided to us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Event and Meeting Attendance** including details of the meetings and events that you have attended.
- **Special Categories of personal data.** In connection with your registration for or attendance at an event, we may ask for information regarding any special dietary requirements or for information about your health to consider for access to an event.

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.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your Contact Data, Marketing and Communications Data or Special Categories of personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - attend an event or meeting;
 - subscribe to our updates and publications;
 - request marketing to be sent to you;
 - enter a survey; or
 - give us some feedback.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Contact Data from the following parties:
 - (a) **Event Hosts and Suppliers**, including venues, caterers, creative agencies and mailing houses;
 - (b) **Media Databases**, such as Roxhill Media Limited based inside the EU;
 - (c) **Public Affairs agencies**, such as Cicero Consulting Limited based inside the EU;
 - (d) **Public Relations agencies**, such as Teneo Blue Rubicon (UK) Limited based outside the EU.
 - (e) **Research Companies**, such as ICS Services Ltd trading as Deliberata, based inside the EU; and
 - (f) **Media Companies**, such as Incisive Business Media Limited, based inside the EU.

4. How we use your personal data

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 comply with a legal or regulatory obligation.
- 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 you have expressly given us your consent, we may use your personal data to communicate with you using your approved methods in the following circumstances:

- To keep you up to date on developments and announcements at Pension Insurance Corporation, including press releases, market briefings, annual reports and white papers;
- To let you know about Pension Insurance Corporation events, seminars and promotional activities; and
- For marketing campaigns, including but not limited to case studies and / or customer testimonials where we have sought and received your express permission.

Otherwise, we generally do not rely on consent as a legal basis for processing your personal data other than in relation to 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 manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Contact (b) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated)
To enable you to complete a survey	(a) Contact (b) Marketing and Communications	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

Promotional offers from us

We may use your Contact Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services, updates and events may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you attended an event or signed up to receive updates from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Pension Insurance Corporation group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

If consent to marketing is withdrawn, we will stop using your contact details for marketing purposes and will inform the 3rd parties to also cease marketing to you on our behalf. It will not affect any other use of your personal data we rely on to fulfil business obligations to you or our legal obligations.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change

happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We want to make sure that we store your personal information securely. So we will only transfer it outside of the UK if it meets data-protection legislation and can be transferred in a way that protects it adequately. This could be done, for example:

- by a data-transfer agreement with a third party, including the current standard contract clauses used by the European Commission for transferring personal information by controllers in the EEA to controllers and processors in countries or states without adequate data-protection laws;
- by transferring it to an organisation who has signed up to the EU-US Privacy Shield Framework for transferring personal information from organisations in the EU or UK to those in the United States of America, or any equivalent agreement for other countries or states;
- by transferring it to a country where the UK Information Commissioner's Office has found that levels of data protection are adequate;
- if it is necessary to carry out or end a contract between us and a third party and the transfer is in your interests for the purposes of that contract; or
- if you have agreed that it can be transferred.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of

your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our Record Retention Schedule which you can request from us by [contacting us](#).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [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](#)

No fee usually required

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.

What we may need from you

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.

Time limit to respond

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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#)

THIRD PARTIES

External Third Parties

- **Event Hosts and Suppliers**, including venues, caterers and creative agencies;
- **Public Affairs agencies**, such as Cicero Consulting Limited, based inside the EU;
- **Public Relations agencies**, such as Teneo Strategy (UK) Limited, based inside the EU;
- **Customer Relationship Management systems**, such as Salesforce.com EMEA Limited, based inside the EU; and
- **Mailing Houses**, such as The Pyramid Angle Limited, trading as Wild West Design, based inside the EU; and
- **Research companies**, such as ICS Services Ltd trading as Deliberata, based inside the EU.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.