

## Fair processing notice for third parties

### Scope of this data protection update

This information is intended to be used by clients with a services agreement, any supplier, or any other third party who interacts with any of the companies below (together **Buck** or **“We”**) where such a contract or relationship involves processing of personal data:

- Buck Consultants Limited (company number 1615055), registered office 160 Queen Victoria Street, London EC4V 4AN;
- Buck Consultants (Administration & Investment) Limited (company number 1034719), registered office 160 Queen Victoria Street, London EC4V 4AN;
- Buck Consultants (Healthcare) Limited (company number 172919) registered office 160 Queen Victoria Street, London EC4V 4AN;
- Buck Consultants Shareplan Trustees Limited (company number 926625) registered office 160 Queen Victoria Street, London EC4V 4AN;

### Who this information is addressed to

Any person where Buck, or a Buck Scheme Actuary, processes personal data in its capacity as a data controller, joint data controller or data controller in common.

### Contact details

If you have any questions please contact [HRS-UKCompliance@buck.com](mailto:HRS-UKCompliance@buck.com).

### Changes

This document may be updated at any time without notice.

### Who we are

Buck is an integrated HR and benefits consulting, administration and technology services provider. Headquartered in New York City, with global operations, Buck is focussed on helping its clients realise the best organisational performance for their business while driving positive health, wealth, and career outcomes for their people. For additional information, visit [www.buck.com](http://www.buck.com).

Buck is generally a data processor when providing administration services, actuarial services, pension consultancy services, investment consultancy services, insurance intermediary services, insurance consultancy services and technology services.

Where a pension scheme has appointed a Buck Scheme Actuary or Buck provides actuarial advice, Buck and the Scheme Actuary act as a joint data controller with the pension scheme trustees (only in relation to those actuarial and scheme actuary services).

Where Buck acts a trustee of a share plan it acts as a Data Controller.

Buck may from time to time act as a Data Controller when providing some consultancy services (i.e., advising on appropriate insurance arrangements or some insurance consultancy advice) and when complying with its own legal and regulatory obligations (e.g. tax obligations, telephone recording).

## **Purposes for which the data is collected and processed**

We will process data for the purposes of:

- carrying out our contractual obligations and services to our clients;
- advising clients and potential clients about our services;
- instructing our suppliers and service providers for the purpose of providing services to our clients;
- corresponding with our client, supplier and other third party contacts,
- complying with legal and regulation obligations (e.g. telephone recording, Institute and Faculty of Actuaries, tax obligations);
- providing information required by regulatory, government or law enforcement authorities; and
- processing complaints, defending potential and/or actual legal claims.

## **Categories of data subjects**

We hold data for the following categories of data subjects:

- employees of clients;
- members of employee benefit plans such as pension schemes and share plans;
- spouses, partners, beneficiaries and potential beneficiaries of employees and members of employee benefit plans;
- pension scheme trustee individuals;
- client contacts; and
- contact details of scheme advisors.

## **Sources of personal data collected**

Personal data is provided to Buck by clients, corporate pension scheme sponsors, trustees, advisors, insurers, fund managers, tracing agencies, data subjects and their family members. Information may also be obtained from the HMRC, the DWP and other third party bodies.

## **Types of personal data collected**

We may hold any or all of the following personal information:

- personal details such as name, title, gender, age, date of birth, postal address, email address, contact number and National Insurance number;
- family information such as any relationships, family members and dependents;
- employment details such as pensionable pay, length of service, employment history, attendance record, job title and job responsibilities;
- financial details such as income, salary, tax and allowances, assets and investments, bank account details, benefits, grants and insurance details.
- medical and other details about the health of data subjects
- copies of documents such as birth certificates, marriage certificates, death certificates, pension sharing orders, insurance underwriting forms, insurance claim forms, medical claims forms, passport, utility bills, bank statements, expression of wishes, spouse birth certificates, spouse marriage certificates, child birth certificates, driving licences, powers of attorney, education confirmation letters, wills, divorce decrees

- details of employees of professional entities such as the scheme actuary, auditor, accountant, payroll provider, medical adviser, investment adviser, risk broker, independent trustee and legal adviser.

We may also process special categories of personal data relating to health status, physical or mental health, and sexual orientation.

### **Lawfulness of processing**

We will rely either on legitimate interest or legal obligation for processing personal data. There may be other bases that from time to time will apply.

### **Data retention and necessity for holding data**

Buck will:

- hold information for as long as is necessary for the provision of services. Processing of information that is necessary, may continue after the termination of services;
- destroy any special categories of personal data held in respect of data subjects if we receive written notice of revocation from the data controller or data subject and that notice must be acted up on in accordance with the law;
- hold personal data to comply with legal obligations and for legal defence purposes.

### **The rights of a data subject**

Data subjects are entitled to know what personal data of theirs is held, to access that personal data and request that it be corrected where it is inaccurate. We will update and amend records under instruction from the data controller and in some instances directly from a data subject. Any non-standard record change requests will be referred to the data controller.

You may change your marketing channel preferences, or request that you stop receiving all communications from us, at any time by contacting us or using an opt-out facility provided in our emails on our website.

You are able to instruct us to correct, update, or delete data that we are holding for marketing purposes. Please note that it is not possible to change or delete each and every instance of the data we hold on our systems.

If you believe that we have not resolved your concerns, you can complain to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

### **Personal data disclosed to third parties**

We may disclose personal data to third parties who may process your personal data on our behalf and such processing will be pursuant to a contract containing suitable data protection clauses. We do not disclose data to third parties for marketing purposes. Personal data, however, may be disclosed to any or all of the following parties:

- corporate sponsors, actuaries, auditors, accountants, treasurers, payroll operators, legal advisers, scheme members and receiving schemes;
- industry bodies such as insurance companies, healthcare providers, voluntary benefit providers, annuity brokers, fund managers and independent financial advisers;

- regulatory and government organisations such as the FCA, HMRC, the DWP, the Pensions Regulator, and Ombudsmen; and
- vendors such as data scanners, IT providers, software developers, mortality screeners, address tracers, printers, archivers and paper shredders,
- any insurer, adviser, auditor, bank or other financial institution, debt collection agency, marketing or public relations consultant, advertiser, management consultant or other provider of services to Buck (or any person working for any of them);
- any actual or potential purchaser of Buck, or the whole or a part of their operations, and any actual or potential seller to Buck of any company or business.

### **Data processed outside of the EEA**

Our email servers and some back office activities (like invoicing) are located outside of the EEA and otherwise our systems and applications that hold personal data are based in the UK. To the extent any personal data from the EEA is transferred to an affiliate, processor, or sub-processor located outside the EEA we utilise all reasonable and approved methods for legitimising that transfer and protecting that personal data, as required by applicable data protection legislation.

These methods may include assessing whether the receiving entity is Privacy Shield Certified, whether the entity adheres to any approved certification programs, using European Standard Contractual (Model) Clauses, and Binding Corporate Rules. In all instances we will seek to have the appropriate contracts and assessments in place designed to protect the data.

### **Technical and organisational security measures**

We are committed to ensuring that all the information that we hold is protected from unauthorised access or disclosure. Our information security management program is a comprehensive set of controls, policies and procedures that address all aspects of IT security and privacy.