

## Fair processing notice for direct marketing purposes

### Scope of this data protection update

This information is addressed to any person with whom Buck communicates by post, email or telephone and relates to the marketing activities of the companies (together “**Buck**” or “**We**”) below:

- 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.

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)

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

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

We will use information about you in the following ways:

- to provide you with information on our products, services, offers and events that you may have requested or which we feel may interest you or where you have consented to be contacted for such purposes
- to perform surveys and analysis with the aim of improving the services we provide.

### Categories of data subjects

For marketing purposes we hold data for the following categories of data subjects:

- client contacts
- prospective clients
- corporate contact details provided to us directly by individuals
- corporate contact details of persons we have identified as being interested in receiving details of services we provide.

### Sources of and types of personal data collected

Personal data may be provided to Buck directly by individuals or in the form of bought-in lists. We may hold any or all of the following personal information:

- identity data that includes first name, last name, and gender
- contact data that includes billing address, delivery address, email address and telephone numbers
- marketing and communications data that includes marketing channel and communication preferences.

## **Lawfulness of processing**

We will rely either on legitimate interest or consent 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 it is useful and necessary for marketing activities. We will destroy any data that we believe to be out of date or no longer accurate.

## **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. 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 or 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 their marketing purposes.

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

While our email servers are located outside of the EEA, our systems and applications that hold personal data are based in the UK. To the extent that 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.

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 we hold is protected from unauthorised access or disclosure. Our information security management programme is a comprehensive set of controls, policies and procedures that address all aspects of IT security and privacy.