Barnett Waddingham Privacy Notice

This privacy policy applies to Barnett Waddingham LLP and its subsidiaries, Barnett Waddingham Actuaries and Consultants Limited and BW SIPP LLP (together, "Barnett Waddingham"). It explains how we collect, use, and protect personal data in connection with information and services provided through the following websites, digital services, and domains:

- barnett-waddingham.co.uk
- bwsipp.co.uk
- fdpensions.co.uk
- bwebstream.com
- bwllp.co.uk
- drumrollcreative.com
- bw.riskportal.app
- claritybw.co.uk
- 4me.barnett-waddingham.co.uk

Additional privacy notices or terms may apply to specific services or platforms. Where this is the case, these will be made available at the point where the relevant service is accessed.

Controller

This privacy notice applies where Barnett Waddingham determines the purposes and means of processing your personal data and acts as a data controller. Our contact details are set out in the 'How to contact us' section below.

In some circumstances, Barnett Waddingham processes personal data on behalf of employers, pension scheme trustees, insurers, benefit providers, or other organisations that act as data controllers. In those circumstances, Barnett Waddingham acts as a data processor, and the relevant organisation remains responsible for providing information about how your personal data is used and for responding to certain data protection rights requests.

Where appropriate, we may assist the relevant data controller in responding to such requests in accordance with our contractual and legal obligations.

Our approach

Barnett Waddingham processes personal data in accordance with applicable data protection legislation. Personal data will only be collected, used, and disclosed where there is a lawful basis for doing so.

We are committed to ensuring that individuals are provided with clear and transparent information about how their personal data is processed, including the purposes of processing and how their data will be used.

Security

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or disclosure.

Users of our systems and services are responsible for maintaining the confidentiality of their login credentials, including passwords, and should notify us promptly of any suspected unauthorised use.

Data Transfers and Sharing

Personal data may be accessed through our websites and services from locations outside your country of residence.

We use third parties to support the delivery of our services. This includes IT service providers, telecommunications providers, and professional advisers such as accountants, lawyers, and auditors. Where these parties process personal data on our behalf, they do so under contractual arrangements, in accordance with our instructions, and are not permitted to use personal data for their own purposes.

We may also share personal data within Barnett Waddingham and, where relevant, with other organisations within the wider Howden group. This may be necessary to support the provision of services, respond to enquiries, and manage our business operations. All such sharing is carried out in accordance with applicable data protection legislation.

We may disclose personal data to regulators, law enforcement agencies, courts, or other third parties where this is required to comply with legal or regulatory obligations, or to establish, exercise, or defend legal rights.

We may also disclose personal data where necessary in connection with a business transaction, such as a merger, acquisition, or reorganisation.

Where you request it, we may share personal data with third parties to enable them to provide services to you. For example, this may include obtaining information or quotations on your behalf.

International Transfers

Personal data may be transferred to countries outside the United Kingdom or European Economic Area which may not have equivalent data protection laws. Where this occurs, we ensure that appropriate safeguards are in place in accordance with applicable data protection legislation. These safeguards may include adequacy decisions or the use of approved transfer mechanisms such as the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or other recognised mechanisms.

Where required, we carry out transfer risk assessments and implement supplementary safeguards to ensure that transferred personal data receives a level of protection that is essentially equivalent to that provided under UK data protection law.

What information may we hold and how we use it

We process personal data in accordance with applicable data protection law, including the UK General Data Protection Regulation and the Data Protection Act 2018. We also take account of relevant updates to UK data protection law where applicable. The types of personal data we process may include:

- Identifiers (such as name, date of birth, and identification information)
- Contact details (such as email address, telephone number, and address)
- Employment and professional information
- Financial and transactional information (where relevant)
- Technical and usage data (such as website activity and system access data)

Legal basis

The lawful basis for processing will depend on the context, but will typically include:

- Processing necessary to perform a contract with you or to take steps at your request
- Processing necessary to comply with a legal or regulatory obligation
- Processing based on your consent (where this has been obtained)
- Processing necessary for our legitimate interests, provided these are not overridden by your rights and interests

Where we rely on legitimate interests as our lawful basis for processing, these interests may include managing our business, providing and improving our services, maintaining client professional relationships, or ensuring information security. Before relying on legitimate interests, we consider the impact of the processing on individuals and balance our interests against their rights and freedoms.

How we collect information

We may collect personal data from a range of sources, including directly from individuals, automatically through our systems and services, and from third parties, including:

- Information provided directly by you, for example when you register for events, request information or services, apply for a role, or contact us with an enquiry or complaint.
- Information collected automatically through our websites, systems, or services, including through cookies and similar technologies.
- Information provided by third parties acting on your behalf or introducing you to us, such as financial advisers, legal representatives, employers, trustees, and benefits providers.
- Information obtained from third parties and publicly available sources, where this is used to support our business activities or improve the relevance and quality of our services.

Types of data and purpose of use

Professional Services

We process personal data to provide professional services including actuarial consulting, pensions consulting and administration, employee benefits services, insurance and risk consulting, investment consulting, Trustee support services, and related advisory services.

Depending on the services provided, this may include processing contact information, employee information, pension and benefits information, financial information, beneficiary information, identification information, and other information relevant to the services requested.

We will make the purpose of processing clear where personal data is collected and may also use personal data for compatible purposes, such as internal management, reporting, and improving our services.

Special Category Data

Some of the services we provide may require us to process special category data. This may include information concerning health, disability, or other sensitive information where relevant to the services being provided.

For example, we may process health information in connection with pensions administration, ill-health retirement applications, employee benefits, insurance services, recruitment processes, or where such information is required to provide our services.

We will only process special category data where permitted by applicable data protection law, including where necessary for employment, social security, substantial public interest purposes, insurance and pension administration, or where explicit consent has been obtained.

Examples of how we use personal data

Correspondence

We may process personal data such as your name, job title, contact details, and correspondence records where this is necessary to respond to enquiries, provide services, manage our relationship with you, or communicate relevant information.

This processing may be conducted for the performance of a contract, to comply with legal or regulatory obligations, where you have provided consent, or for our legitimate interests in managing communications and relationships.

Account management

We may process personal data to establish and manage contractual relationships with you or the organisation you represent, and to deliver our services. This may include maintaining contact details, records of correspondence, information about services provided or requested, complaints and feedback, and financial information required for billing and payment processing.

Business Records

We may process personal data for the purposes of maintaining accurate internal business records, including reporting, business planning, project management, accounting, and audit activities. This processing is conducted on the basis of our legitimate interests in managing and operating our business effectively.

Automated Decision Making

We do not currently make decisions based solely on automated processing that produce legal effects or similarly significant effects on individuals.

We may use automated tools to assist with administrative purposes, fraud prevention, analytics, and service improvement. However, any significant decisions affecting individuals are subject to appropriate human review.

If we introduce processing that involves solely automated decision making with legal and similarly significant effects, we will provide additional information about the processing and the safeguards available to affected individuals.

IT and Security

We may monitor our IT systems and communications where necessary to maintain the integrity, confidentiality, and security of our systems, and to ensure compliance with internal policies and legal obligations. We also process account credentials and authentication data to control access to our systems and services.

Recruitment

Where you apply for a role or make an enquiry about employment opportunities, we may process personal data such as your CV, employment history, and qualifications to assess your suitability and manage the recruitment process. Where appropriate, a separate privacy notice will be provided setting out how your personal data will be managed in the context of recruitment.

AI and Technology Transparency

We may use technology, analytics tools, and artificial intelligence systems to support the delivery of our services, improve efficiency, enhance information security, and assist with administrative tasks.

Where personal data is processed using such technologies, appropriate safeguards are implemented to protect privacy and ensure compliance with applicable data protection laws. The use of such technologies does not replace human

oversight where decisions may significantly affect individuals.

Visiting our sites and events

We may process personal data where individuals visit our offices or attend events, including recording names, contact details, and entry and exit times. This may be necessary to support security, health and safety, and event management arrangements.

Where appropriate, additional information such as dietary requirements may be collected with your consent for the purpose of providing suitable hospitality.

CCTV may operate at our premises for security purposes, with appropriate signage in place. In some locations or events, CCTV may be operated by a landlord or event organiser acting as a separate controller.

Compliance

We may process personal data to comply with legal and regulatory obligations, and to support our legitimate interests in managing risk, preventing fraud and financial crime, carrying out anti-money laundering checks, complying with sanctions requirements, and investigating potential issues or concerns.

This may involve processing identification and verification information, such as date of birth, place of birth, identification documents, or other supporting evidence where required. Where necessary, personal data may also be retained and disclosed to relevant authorities to meet these obligations.

Information about others

Where you provide personal data relating to another individual, you are responsible for ensuring that you have the appropriate authority to share that information and that the individual understands how their personal data will be used.

Common interests

We may process personal data where we have an existing professional relationship or shared business context, for example where we have clients in common or are working together in a professional capacity. In these circumstances, personal data will be used only for purposes related to those legitimate interests, unless you have provided consent to receive marketing communications.

Cookies

What are cookies?

Cookies are small text files that are stored on a user's device and used by websites to support functionality and improve user experience. Further information about cookies is available from the Information Commissioner's Office (ICO) https://ico.org.uk/.

Use of cookies by Barnett Waddingham

Barnett Waddingham uses cookies and similar technologies across its websites for a range of purposes, including supporting website functionality and, where applicable, analytics and marketing.

Some cookies are set by third parties, including service providers supporting analytics and marketing activities.

Further information about the cookies we use and their purposes is available on our website or through the cookie notice presented when you access our services.

When you visit our websites, you are given the option to accept or manage non-essential cookies. You may also control the use of cookies through your browser settings.

Where required by law, we will ask you for consent before placing non-essential cookies and similar technologies on your device. Essential cookies that are necessary for the operation, security, or functionality of our websites may be used without consent where permitted by law.

Consent for marketing emails

We will only use your contact details to send marketing communications (including emails, texts, or calls) where you have provided your consent to receive them.

You can manage your communication preferences, including selecting the channels and topics you are interested in, through our Preference Management Centre.

You may withdraw your consent or update your preferences at any time, including by using the unsubscribe option included in any marketing communication or through our preference management tools.

Withdrawing consent for marketing communications will not affect other communications that are necessary to provide services to you or to manage your relationship with us.

Links to other websites

This privacy notice does not apply to external websites that may be accessed through links from our services. Where you access such websites, you should review the relevant privacy notices provided by those organisations before using their services.

Your rights

You have a number of rights in relation to your personal data under applicable data protection legislation. These may include:

- The right to obtain confirmation as to whether your personal data is being processed and to request access to that data. Further information is available on our website.
- The right to request that personal data is corrected where it is inaccurate or incomplete.
- The right to request deletion of personal data where there is no valid reason for it to be retained.
- The right to object to the processing of your personal data in certain circumstances, including where processing is based on legitimate interests.
- The right to request restriction of processing in certain circumstances.
- The right to data portability of your personal data to another organisation, where applicable.
- The right to withdraw consent at any time where processing is based on consent.

We will respond to requests concerning your data protection rights without undue delay and, in most cases, within one month of receipt. We may need to verify your identity before responding.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your personal data has been processed in a way that does not comply with applicable data protection law. We encourage you to contact us first so that we can attempt to resolve your concerns.

Further details about UK GDPR and your rights under UK GDPR can be found on the ICO's website at https://ico.org.uk/.

Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory, tax, accounting, or reporting requirements.

Personal data may be retained for longer periods where necessary, for example in connection with complaints, disputes, or where there is a reasonable prospect of litigation.

In determining appropriate retention periods, we consider the nature, sensitivity, and volume of the personal data,

the purposes for which it is processed, the potential risks associated with its use, and applicable legal and regulatory requirements. Many client and service-related records are retained for up to seven years following the end of the relevant relationship, in accordance with legal, regulatory, contractual, and professional obligations, unless a longer retention period is required or justified.

In certain circumstances, you may request the deletion of your personal data. Further information is set out in the "Your rights" section.

Where appropriate, personal data may be anonymised so that it can no longer be associated with an individual. Anonymised data may be retained and used for purposes such as research or statistical analysis.

Different retention periods apply depending on the nature of the personal data, the services provided, and our legal, regulatory, contractual, and professional obligations. Where personal data is no longer required, it will be securely deleted, anonymised, or otherwise disposed of in accordance with our retention policies. Further information about applicable retention periods is available on request.

Children

Our services are not directed at individuals under the age of 16. Where we become aware that personal data has been collected from a child without appropriate safeguards, we will take steps to address this. If you are a parent or guardian and believe that a child has provided personal data to us, please contact us using the details set out below.

Changes to this privacy policy

This privacy policy is kept under regular review and may be updated from time to time. The most recent version will be made available on our website.

How to contact us

Requests for information about our privacy policy, requests to exercise your rights, or complaints can be emailed to:

dataprotection@barnett-waddingham.co.uk or by writing to:
Governance Department
Barnett Waddingham LLP,
One Creechurch Place,
London,
EC3A 5AF