



Privacy Policy

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Privacy Policy

Policy brief & purpose

JSS Pensions Administration understands the importance of protecting personal information and is committed to complying with the General Data Protection Regulation 2016/679 (GDPR). It is committed to fostering a culture of transparency and accountability by demonstrating compliance with the principles set out in the Regulation.

GDPR sets out the rules for how organisations must process personal data and sensitive personal data about living individuals. It gives individuals the right to find out what personal data is held about them by organisations and to request to see, correct or erase personal data held.

Scope

This policy applies to all personal data and special category data collected and processed by JSS Pensions Administration in the conduct of its business and applies to both automated personal data and to manual filing systems.

Responsibilities

- JSS Pensions Administration needs to collect and process personal data about individuals for the administration of their pension benefits.
- JSS Pensions Administration have the responsibility for ensuring data is processed in line with the GDPR requirements.
- JSS Pensions Administration will have access to personal data only where it is required as part of their functional remit.
- Personal data will not to be disclosed to unauthorised people, either within the company or externally.

Personal data definitions

Personal data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Special categories of personal data relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Overview of the Data Protection Legislation

The General Data Protection Regulation (GDPR) forms part of the data protection regime in the UK, together with the new Data Protection Act 2018 (DPA 2018). The GDPR provides greater rights to 'data subjects' (individuals whose personal data is being collected, held or processed).

GDPR outlines six principles which underpin the handling of personal data. To ensure compliance with the Regulation, JSS Pensions Administration must ensure that personal data is:

- Processed lawfully, fairly and in a transparent manner;

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- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information is processed; and
- Processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

In order to comply with these principles JSS Pensions Administration will:

- Be transparent about how we intend to use personal data and provide privacy notices where appropriate;
- Ensuring that any additional processing of personal data is fair.
- Have a legitimate ground for collecting and using personal data;
- Be clear about why we are collecting personal data and what we will do with it;
- Only processing the personal data that is necessary;
- Taking reasonable steps to ensure the accuracy of any personal data held;
- Considering the purpose you hold the personal data for in deciding whether, and how long, you retain it;
- Take appropriate security measures to safeguard personal information;

Data Access

All data subjects are entitled to make a Subject Access Request to ask JSS Pensions Administration whether it holds any personal data relating to them and, if so, to be given a description of and a copy of that personal data. Exemptions may apply in certain circumstances.

Subject access requests are co-ordinated by the data protection team.

Privacy Notices will include a contact address for data subjects to use should they wish to submit a Subject Access Request, make a comment or complaint about how we are processing their data, or about the handling of a Subject Access Request.

Data sharing

Personal data will not be transferred outside the European Economic Area unless that country or territory can ensure an adequate level of protection for the rights and freedoms of the data subjects in relation to the processing of their personal data.

Personal data in any format will not be shared with a third party organisation without a valid business reason, a contract or Data Sharing Agreement in place, or without the data subject's consent.



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Privacy by design

JSS Pensions Administration is committed to meeting the GDPR requirement to consider data privacy at the point that any new or amended processes are considered.

Data Protection Impact Assessments (DPIA) are a key mechanism for meeting this requirement and will be carried out for all new system and ensure that privacy risks are considered at an early stage. They allow an organisation to demonstrate to data subjects and regulators that the personal data will be handled in a responsible way and that the organisation is compliant with the GDPR.

Compliance

Breaches of this policy will be investigated and appropriate actions taken.

Policy benefits

This policy will benefit JSS Pensions Administration by

- Promoting transparency and accountability, and fostering a data protection culture across the organisation.
- Ensuring compliance with the Regulation.
- Ensuring confidence and compliance in processing of personal data, being fully informed and aware of their responsibilities and obligations.
- Providing confidence to individuals that their personal data is being well managed and ensuring data subjects know how they can access it.

Changes to this privacy policy

We may change this privacy notice and we encourage you to check this privacy notice from time to time.

- Current version: 1.0
- Published on: 23 May 2018
- Last revision: 1.0