

## **DM Cager privacy notice DM Cager Workplace Pensions – Privacy Notice**

### **Introduction**

This Privacy Notice sets out how DM Cager Workplace Pensions (trading name of DM Cager Auto Enrolment Limited), a company registered in England and Wales with company number 09150145, having its registered office at Prince Albert House, 20 King Street, Maidenhead, Berkshire, SL6 1DT ("DM Cager Workplace Pensions", "We"), use and protect any personal data provided to it. For full details of our Privacy Policy, including how We may collect personal data through use of our website, please see our Privacy Policy at [www.dmcwp.co.uk](http://www.dmcwp.co.uk).

### **Why am I receiving this Privacy Notice?**

You are receiving this Privacy Notice because DM Cager Workplace Pensions has been engaged by your employer, to provide various services to your employer in connection with the administration of Auto Enrolment ("Services"). Through providing Services to your employer, DM Cager Workplace Pensions may collect and process personal data about you on behalf of DM Cager Workplace Pensions' client (your employer), in respect of the administration of Auto Enrolment.

DM Cager Workplace Pensions are firmly committed to respecting and protecting the privacy of all personal data received or collected by it, in adherence to Data Protection Legislation (defined below) and best business practice. DM Cager Workplace Pensions has established this Privacy Notice so that you can understand the care with which we intend to treat your personal data.

### **Terminology used**

DM Cager Workplace Pensions' data protection and privacy measures are governed by the (i) the General Data Protection Regulation ((EU) 2016/679) ("GDPR") and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998 ("Data Protection Legislation").

For the purpose of Data Protection Legislation, where DM Cager Workplace Pensions is provided personal data by you or your employer to DM Cager Workplace Pensions for the administration of Auto Enrolment when providing Services to its clients (your employer), then DM Cager Workplace Pensions will only process that personal data in accordance with the instructions of your employer and DM Cager Workplace Pensions will therefore act as a data processor in respect of such personal data. Your employer will be the data controller of that personal data for that purpose and would have collected that personal data from you in accordance with their own privacy notices issued to you. You should therefore check your employer's own privacy notices, to ensure you understand how your personal data may be processed.

### **How is your personal data collected?**

DM Cager Workplace Pensions may collect personal data about you from your employer, or through your direct interactions with us (either over the phone, by post, email or otherwise).

### **How DM Cager Workplace Pensions uses your personal data**

DM Cager Workplace Pensions will only use your personal data as instructed by our clients (your employer), in accordance with their instructions or in order to comply with a legal or regulatory obligation.

### **Personal data and Basis for Collection**

Personal data means any data or 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 process your personal data in respect of Auto Enrolment, at the request of your employer.

DM Cager Workplace Pensions does not process any Special Categories (as defined by Data Protection Legislation) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) unless required for providing our Services in connection with the administration of Auto Enrolment and as may be required for regulatory purposes.

#### **How your personal data may be shared**

We may need to share your personal data with other third parties for the administration of Auto Enrolment and your membership of the Creative Pension Trust (the pension scheme your Employer has chosen to meet their Auto Enrolment obligations), including:

- with permitted third party contractors of DM Cager Workplace Pensions for the purposes of performing its Services;
- The Creative Pension Trust Scheme Administrators and the Scheme Trustees
- where DM Cager Workplace Pensions is under a duty to disclose your personal data to comply with any legal obligation, or to enforce or apply DM Cager Workplace Pensions' or terms and conditions and other agreements;
- to protect the rights, property, or safety of DM Cager Workplace Pensions, DM Cager Workplace Pensions' client, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and for compliance with laws; and
- with the Pensions Regulator and/or Financial Conduct Authority, as may be appropriate for regulatory purposes.

#### **How DM Cager Workplace Pensions stores personal data**

For secure storage, DM Cager Workplace Pensions does not transfer your personal data outside the European Economic Area (EEA).

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.

#### **Personal Data Retention**

We will only retain personal data for the period notified to DM Cager Workplace Pensions by your employer, which will usually be for 6 years after the termination of the Services (unless otherwise required by a regulator or by law).

#### **Your Rights**

You have certain rights under Data Protection Legislation in relation to your personal data. As we act as the data processor for your employer, we will assist your employer in any exercise of your rights with them, however any requests for exercising your rights should be directed to your employer in the first instance.

**How to contact us**

If you have any questions regarding your personal data and how we may use it, including any queries relating to this Notice, please contact us at enquiries@mlwp.co.uk or writing to 'Privacy Notice Request' at the registered office address noted above.

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.

**Changes to this Privacy Notice and your duty to inform us of changes**

As and when necessary, changes to this Privacy Notice will be posted here. Where changes are significant, we may also email all our registered users with the new details, and where required by law, we will obtain your consent to these changes.

This Privacy Notice was last updated on 25 April 2018.

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