LCP INSIGHT CLARITY ADVICE

22 March 2019

LCP's record of processing activities
For use where LCP provide actuarial, risk benefit, employee benefits and investment consultancy services to employers

The General Data Protection Regulation (GDPR) requires all data controllers to keep a record of the processing of personal data for which they are responsible. This is commonly called "data mapping". The written record of processing activities needs to be made available, on request, to the Information Commissioner's Office (ICO).

The information in this note has been provided to capture the processing activities that LCP performs in relation to our clients' data and to assist our clients in maintaining their written record of processing activities.

1. Details of the data controller, data processor and data subjects

- Data controller: our client
- Data processor: Lane Clark & Peacock LLP
- Data subjects:
  - Our clients' former, current and prospective employees
  - Our clients' current owners, directors and shareholders
  - Trustees/Managers of our clients' benefit arrangements
  - Active members of our clients' pension schemes and other employee benefits arrangements
  - Deferred members of our clients' pension schemes and other employee benefits arrangements
  - Pensioners (including those in receipt of dependants' or spouses' benefits) in our clients' pension schemes and other employee benefits arrangements

Lane Clark & Peacock LLP is a limited liability partnership registered in England and Wales with registered number OC301436. LCP is a registered trademark in the UK (Regd. TM No 2315442) and in the EU (Regd. TM No 002935583). All partners are members of Lane Clark & Peacock LLP.
A list of members' names is available for inspection at 95 Wigmore Street, London, W1U 1DQ, the firm's principal place of business and registered office. The firm is regulated by the Institute and Faculty of Actuaries in respect of a range of investment business activities. Locations in London, Winchester, Ireland and - operating under licence - the Netherlands.

  - Prospective employees / scheme members / other beneficiaries who will or may receive benefits from the employer and / or the employer's current or prospective schemes (for example in their own right or on the death or divorce of an employee or member)
  - Former employees or scheme members (for example employees who have died or members who have transferred out of the scheme)
  - Ex-spouses of employees or members (for example following a pension sharing order)
- Third parties with whom data may be shared:
  - Client's other professional advisers (for example legal advisers, administrators, actuaries, investment consultants and insurers)
  - Client's auditors
  - Insurance providers
  - Trustees/Managers of our clients' benefit arrangements and their professional advisers, auditors and insurance providers
  - Regulatory authorities (for example the Pensions Regulator, Competition and Markets Authority and HM Revenue & Customs)
  - Employees / Members' advisers (only with authorisation from the employee / member)
  - Other service providers (for example payroll providers, banks, investment managers, occupational health and other health professionals / providers and tracing agencies)
  - Potential acquirers of our client's business or businesses and their advisers
- Contact details for LCP's Data Protection Officer: Data.Protection@lcp.uk.com

2. Record of data held and purposes of the processing

2.1. Categories of personal data

- Personal details such as name (including former names), date of birth, retirement date/age, sex, contact details (eg home address and former addresses, telephone numbers and e-mail address), identifiers such as National Insurance (NI) number.
- Employment and scheme membership details such as dates of joining and leaving employment (including reason for leaving, where relevant to benefit calculations) and employment history (eg whether part-time or full-time, periods of absence and job title), periods of service in the scheme, earnings and details of other benefits.

- Details of pension contributions and other benefits, such as compulsory and voluntary contributions, actual or potential defined benefits (including any contracted-out benefits), defined contribution account information (eg investment allocation and account balance), risk benefits.
- Other financial details such as other pension arrangements, relevant tax and National Insurance (NI) details (eg bank sort code and account number, tax code, Lifetime Allowance and other protections), deductions from pension payroll.
- Details of family and social circumstances such as current marriage or civil partnership, any previous relationships and dependants, death benefit distribution information (including expression of wish forms).
- Copies of identification and similar documents (eg birth, marriage, civil partnership and death certificates, passport identity pages, decree absolute, pension sharing and earmarking orders).
- Information about historical and current physical or mental health to determine and provide benefits.
- Information about business travel patterns.

2.2. Purposes of processing the data

- To carry out actuarial, statistical and financial modelling calculations in order to advise our clients, in relation to their pension schemes and other employee benefit arrangements, about:
  - scheme funding and investment matters;
  - premium and contribution setting;
  - financial reporting, including liaising with auditors; and
  - other matters in relation to the general running of their scheme.
- To carry out actuarial, statistical and financial modelling calculations in order to advise our clients on an acquisition, disposal or merger of a business or a restructuring of their business.
- To advise our clients on scheme design.
- To advise on the selection of suitable service providers.
- To establish the identity of members and their eligibility for benefits (including following divorce or death of a member and in cases of ill-health early retirement).

- To calculate and pay pension scheme benefits and other benefits, and deal with any queries about these.
- To calculate and reconcile contributions.
- To advise on possible tax charges, monitor whether allowances are exceeded, whether protections may apply and report to HM Revenue & Customs.
- To assist with the client's compliance with legal obligations, such as reporting to relevant authorities and government bodies.
- To assist the client in preparing their accounts and assist the client's auditors (including in respect of our client's pension arrangements and other employee benefits arrangements).
- For risk management purposes, including the insurance or management of longevity and life assurance risks and obtaining quotations for annuities or other insurance products; and liability management exercises including enhanced transfer values and pension increase exercises.
- To communicate with employees and scheme members about their benefits and the scheme in general.
- To trace members and other beneficiaries.