



THE SOCIETY OF PENSION
PROFESSIONALS

making pensions work

Data Sharing Protocol for Member Firms

About us: The Society of Pensions Professionals (**SPP, us, our, we**) is the representative body for a wide range of pension advisors and service providers. Our member organisations include actuaries; lawyers; consultants; administrators; investment managers; professional trustees and covenant assessors.

Why is this data sharing protocol needed? This data sharing protocol is aimed at our members and prospective members. Membership of SPP confers certain benefits on members and their employees. When an organisation (**you, your**) applies to become an SPP member, you might provide SPP with contact and professional details of employees in your organisation you think would be interested in receiving information from SPP. Once you are a member, you might also provide SPP with updated employee information from time to time. This protocol explains the steps you and SPP should take in respect of employee personal data that you share with SPP in connection with your membership.

Not legally binding: This protocol is not legally binding.

Categories of personal data: The types of employee personal data that you might share with SPP (**Shared Data**) are Identity Data, Contact Data, and Professional Data as described in our [Privacy Policy](#). Please do not share any special categories of personal data with SPP.

Controllers: You and SPP are separate controllers of Shared Data.

SPP's lawful basis for receiving Shared Data is that this is necessary for our legitimate interests in running the SPP. SPP may use Shared Data in accordance with our [Privacy Policy](#), as updated from time to time.

Your lawful basis and accuracy: Before providing SPP with Shared Data you should ensure that (a) you have a lawful basis for providing that Shared Data to SPP and (b) you have provided each data subject with clear, transparent information in accordance with UK GDPR that their personal data will be shared with SPP for the purpose of your SPP membership. You should also tell us if any of the individuals to whom Shared Data relates are located outside the UK.

Accuracy of Shared Data: You should ensure that Shared Data you provide to SPP is accurate at the time it is provided. If a person who you have registered with SPP as one of your employees, ceases to be employed by you, you should notify us within a reasonable time.

Security of Shared Data: You and SPP should each implement appropriate technical and organisational measures to safeguard Shared Data against a personal data breach (as defined in UK GDPR). These measures should be proportionate to the harm which might result from a personal data breach having regard to the type of Shared Data.

Data subject requests and complaints: If SPP receives a request from a data subject to exercise their rights over Shared Data or a complaint from a data subject or the Information Commissioner that relates to Shared Data (a **Request or Complaint**), SPP is responsible for responding to that Request or Complaint. If you receive a Request or Complaint, you are responsible for responding. At one party's request, the other will provide reasonable cooperation and assistance (at the requesting party's cost) in respect of Requests or Complaints.

Personal data breaches: If you or SPP suffer a personal data breach affecting Shared Personal Data, the affected party should notify the other without undue delay after becoming aware of the personal data breach, including details of the nature of the affected Shared Data, the likely consequences and the measures taken or proposed to be taken to address the personal data breach. A personal data breach has the meaning given in UK GDPR.

Retention and Deletion of Shared Data: You and SPP should each process Shared Data only for as long as reasonably necessary for your or SPP's purpose.

Compliance with UK GDPR: You and SPP shall each comply with their respective obligations under UK GDPR in so far as they apply to Shared Data.

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The Society of Pension Professionals

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