

# Our Privacy Policy / GDPR Statement

## Introduction

This notice applies across all websites that we own and operate and all services we provide.

## Background

Workplace Pensions Direct Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon when you first start using Our services.

## Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“personal data”</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us directly or that is provided to us via your employer. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
------------------------	--

<b>“We/Us/Our”</b>	means Workplace Pensions Direct Ltd, a limited company registered in England under company number 08595563, registered address: Century Office, Thorpe Park, Leeds, LS15 8ZB. Telephone 0113 4574574
--------------------	--

## Information About Us

Our Site is owned and operated by Workplace Pensions Direct Ltd, a limited company registered in England under company number 08595563, whose registered address is Century Office, Thorpe Park, Leeds, LS15 8ZB and whose main trading address is Century Office, Thorpe Park, Leeds, LS15 8ZB

Our VAT number is 199734934.

Our Data Protection Officer is Drew Donaldson, and can be contacted by email at [drew.donaldson@wpd.email](mailto:drew.donaldson@wpd.email), by telephone on 0113 4574574, or by post at is Century Office, Thorpe Park, Leeds, LS15 8ZB

## What Does This Policy Cover?

This Privacy Policy applies to how we use your data.

## Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data We hold about you;

- The right to rectification if any personal data We hold about you is inaccurate or incomplete;
- The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in this policy if you would like Us to delete it sooner, please contact Us using the details in below);
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office.

For further information about your rights, please contact the Information Commissioner’s Office or your local Citizens Advice Bureau.

### How and Why do we collect data?

When you visit our website or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

1. Information you provide to us directly
  - a. When you visit or use some parts of our website and/or services we might ask you to provide us with personal data. For example, when you ask for a quote or request support.
2. Information we collect automatically
  - a. We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you’re using our websites and services so that we can continue to provide the best experience possible.
  - b. Some of this information is collected using cookies and similar tracking technologies.
    - i. A cookie is a small text file that’s placed on your computer or mobile device when you visit one of our websites. We, and some of our affiliates and third-party service providers, may use a few different types of cookies. Some are persistent cookies (cookies that remain on your hard drive for an extended period of time) and some are session ID cookies (cookies that expire when you close your browser).
  - c. *Why do we use cookies/tracking technologies?*
    - i. To enhance and customise your experience across our websites and services, perform analytics and deliver advertising and marketing that’s relevant to you.
    - ii. There are also cookies set by third parties across our websites and services. Third party cookies enable third party features or functionality to be provided on or through our websites and services, such as advertising,

interactive content and analytics. They also enable us to use advertising networks to manage our advertising on other websites.

*iii.* You can accept or reject cookies by amending your web browser controls. Because they're important, our websites and services might not work like they're supposed to, and in some cases, might not work at all, if you decide to reject our cookies.

3. Information we collect from third parties

- a. Sometimes we collect personal data about you from other sources, such as publicly available materials, trusted third parties like our marketing and research partners or from your employer. Where we collect personal data, we'll only process it:
  - i. to perform a contract with you, or
  - ii. where we have legitimate interests to process the personal data and they're not overridden by your rights, or
  - iii. in accordance with a legal obligation, or
  - iv. where we have your consent.
  - v. If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you.

We collect data for three reasons:

1. To provide an ongoing service for employers who have contracted with us to provide automatic enrolment support and/or payroll support
2. To provide ongoing guidance in connection with automatic enrolment to third party providers, such as financial adviser, accountants and other professional advisers
3. To provide marketing information relevant to the services provided by Us.

## What Data Do We Collect?

### Employees

To enable employers to comply with automatic enrolment legislation we may collect some or all of the following personal and non-personal data from them in connection with their employees:

- name
- business/company name
- job title
- contact information such as home address, email addresses and telephone numbers
- personal information such as date of birth, national insurance number, earnings, employment start date

### Business Advisers

- name
- business/company name
- job title
- contact information such as home address, email addresses and telephone numbers

## How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under GDPR at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with your employer, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- *As an employee of a client:*
  - Assessing your eligibility status for automatic enrolment
  - Calculating a minimum level of pension contributions
  - Producing statutory communications in accordance with the legislation
- *As a pension scheme member:*
  - Providing your pension scheme with personal information, necessary to set you up as a member
  - Providing your pension scheme with details of your pension contributions and earnings, on an ongoing basis
- Personalising and tailoring your experience on Our Site;
- Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you)
- Replying to emails from you
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by either clicking on an unsubscribe option in Our emails or by contacting [info@workplacepensionsdirect.co.uk](mailto:info@workplacepensionsdirect.co.uk))

With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email and/or telephone and/or post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

## How and Where Do We Store Your Data?

We only keep your personal data for as long as We need to in order to use it as described, and/or for as long as We have your permission to keep it.

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

Your data will only be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein).

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site or directly from our clients.

### Do We Share Your Data?

We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

### What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

### How Can You Control Your Data?

In addition to your rights under the GDPR, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

### Your Right to Withhold Information

You may restrict Our use of Cookies.

### How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable, and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [hello@purplehr.co.uk](mailto:hello@purplehr.co.uk).

### Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [info@workplacepensionsdirect.co.uk](mailto:info@workplacepensionsdirect.co.uk), by telephone on 0113 4574574, or by post at Century Office, Thorpe Park, Leeds, LS15 8ZB. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

### Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.