

## Frequently Asked Questions



Smart is committed to its obligation to ensure compliance with the General Data Protection Regulation (“GDPR”), which came into effect on 25th May 2018. This FAQ document is intended to answer any queries you may have in relation to Smart’s compliance with GDPR.

### 1. Who should I contact with any queries in relation to GDPR?

If you have any queries that are not addressed in this FAQ document, please email [privacy@smartpension.co.uk](mailto:privacy@smartpension.co.uk).

### 2. Do you have a data protection officer and, if so, who is it?

Smart does not currently have a data protection officer. Smart has a team of individuals who are responsible for data protection compliance and ensuring that all information you provide to us is kept safe and secure.

### 3. In what capacity does Smart process personal data?

Smart is a data controller in respect of the data it holds and processes.

### 4. What personal data does Smart hold?

Smart holds data provided to it by employers that have used the Scheme as their workplace pension scheme. As a result, Smart also holds personal data belonging to the employees of that business. This will include personal information including; name, home address, date of birth, national insurance number, email address(es), details of beneficiaries and certain financial information (e.g. salaries). Smart also holds personal data in respect of its own employees.

### 5. When I share personal data with Smart is it by secure connection?

Personal data that is submitted to Smart is sent via HTTPS which is a secure connection that encrypts data during the connection.

### 6. Is the data that Smart collects from us encrypted in transit and at rest?

Yes, data is encrypted in transit. Some data such as passwords are encrypted at rest. Although, not all data is encrypted at rest.

### 7. Where does Smart store personal data?

Smart stores customer data in its cloud-based hosting environment provided by Amazon Web Services.

### 8. Will personal data be disclosed to third parties?

Information will only be disclosed to other third parties where this is expressly authorised. For example, it may be disclosed to advisers who use the Smart Pension Adviser platform and who have a direct relationship with the employer. The employer is in full control of this relationship and can revoke access at any time.

Smart may also share data where required or permitted by law (for example, with The Pensions Regulator to ensure continued compliance of the pension scheme). Please also see the answer to question 9.

### 9. Does Smart sub-contract to any other organisations?

Smart sub-contracts to a number of organisations, usually limited to the following areas of the business:

- Cloud hosting
- Sending automated application emails (e.g. “account created”, “contribution percentage changed”, “forgotten password” etc.)

- Live chat
- Standard notifications (e.g. reminding customers of upcoming changes to the Scheme or legislation)
- Internal email and document storage

## 10. What technical and organisational security measures does Smart have in place?

Smart has contracts and/or terms of business in place with all of its sub-contractors to ensure that all internal, customer and third-party data is secure at all times. These contracts reflect the new requirements of the GDPR. In addition, all employees of Smart are committed to ensuring the confidentiality of all data and receive ongoing training in this regard.

Smart ensures that its purpose-built services and those of its sub-contractors (where available) have two-factor authentication enabled by default. This requires a six-digit code to be added in addition to the user credentials in order to access the system(s). The Smart Pension API uses OAuth 2 to manage secure access to all Smart's customer-facing applications. Customers can add two factor authentication to their account via OAuth 2. As an example, members of Smart's customer service team are required to have an active Smart Pension email address to access the back office which then requests a six-digit code to verify the user. That user is subject to a set of roles that defines which data sets they can access. If that user leaves Smart Pension their email address is deactivated which in turn prevents access to this and many other applications.

## 11. Is any of the data transferred to, or accessed from, outside the EEA?

Smart will not itself transfer personal data outside the EEA. Where any of Smart's sub-contractors transfer personal data outside the EEA it will ensure that adequate safeguards are in place.

## 12. Does Smart offer a Data Processing Agreement?

No, Smart is a data controller and is not required under the GDPR to have data processing agreements with employers.

## 13. What policy does Smart have in place regarding the deletion of data?

The length of time Smart holds data will vary depending on the type and content of that data. Smart will only hold personal data for the minimum time required in order to fulfil its functions. Please contact [privacy@smartpension.co.uk](mailto:privacy@smartpension.co.uk) with any particular queries in this regard.

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