

## GDPR Website Privacy Notice

We are committed to ensuring that your privacy is protected. This Privacy Notice explains how we use information about you:

- which your employer or pension scheme trustee has provided to us, and
- any additional information you provide via the [www.eapf.org.uk](http://www.eapf.org.uk) website.

Depending on the services we are providing to your employer or administering authority you may be able to limit the use of that information, and where that is possible this is explained below.

This notice also explains the procedures that we have in place to safeguard your privacy.

This Privacy Notice is supplemental to our Website Terms, and which, by continuing to access [www.eapf.org.uk](http://www.eapf.org.uk) (the 'Website') you are deemed to accept and agree to be bound by.

### Who is providing this website?

Capita People Solutions Limited and Capita Employee Benefits (Consulting) Limited (trading as Capita Employee Solutions) ("we"). We are registered in England and Wales under company numbers 02260524 and 01860772 respectively and have our registered office situated at 17 Rochester Row, Westminster, London, SW1P 1QT.

We are authorised and regulated by the Financial Conduct Authority under registration numbers 142484 and 115051 respectively.

We provide employee benefits and administration services to your employer or administering authority (including communication services). As part of these services, they provide us with information about you to enable us to administer your pension benefits and to allow you to apply for any additional optional benefits your employer ask us to make available to you.

Your employer is the 'Controller' of this information and Capita is a 'Processor'.

This Privacy Notice is therefore supplemental to the Privacy Notice provided by your employer or administering authority and only relates to our services as outlined above.

We reserve the right, at our discretion, to change, modify, add, or remove portions from this policy at any time. Please read this Privacy Policy carefully and re-visit this page from time to time to review any changes that may have been made.

### Keeping your information safe

Our Website has security installed to ensure that any personal data entered onto the site is protected against loss, misuse or alteration.

We take appropriate steps to maintain the security of your data; however, you should understand that the open nature of the Internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended.

Whilst we use all reasonable endeavours to protect your security, we consider that it is only appropriate to advise users that data transmission over the Internet and the World Wide Web cannot be guaranteed as 100% secure, and therefore that you use the Website at your own risk.

## Cookies used by this website

To remain compliant with GDPR our website must obtain the consent of the user. Declining cookies should not be a barrier to using the website.

There will be no impact on the experience of the site should a user decline cookies (other than those marked strictly necessary).

We've provided more in-depth information detailing all cookies used on our website below.

### Necessary first party cookies:

Cookie key	Domain	Path	Cookie type	Expiration	Description
CookieScriptConsent	www.eapf.org.uk	/	First-party	28 days	This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.
ASP.NET_SessionId	www.eapf.org.uk	/	First-party	Session	General purpose platform session cookie, used by sites written with Microsoft.NET based technologies. Usually used to maintain an anonymised user session by the server.
visid_incap_2612788	.eapf.org.uk	/	First-party	12 months 4 days	Preserves users states across page requests.
incap_ses_763_2612788	.eapf.org.uk	/	First-party	Session	Preserves users states across page requests.

### Performance first party cookies:

Cookie key	Domain	Path	Cookie type	Expiration	Description
SC_ANALYTICS_GLOBAL_COOKIE	.eapf.org.uk	/	First-party	10 years	This cookie name is associated with the Sitecore Content Management System as is used for web analytics to identify repeat visits by unique users.
_gid	.eapf.org.uk	/	First-party	1 day	This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used

					to count and track pageviews.
_gat_UA-33589792-3	.eapf.org.uk	/	First-party	1 minute	This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to. It is a variation of the _gat cookie which is used to limit the amount of data recorded by Google on high traffic volume websites.
_ga	.eapf.org.uk	/	First-party	2 years	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.

**Functionality first party cookies:**

Cookie key	Domain	Path	Cookie type	Expiration	Description
_gat_clientTracker	.eapf.org.uk	/	First-party	1 minute	Google Universal Analytics technical cookie used to throttle request rate
__utmvc	www.eapf.org.uk	/	First-party	29 seconds	This cookie enables the function of Google Analytics.

### Third party cookies

These cookies are set through our website by trusted external sources. They do not directly store personal information but are based on uniquely identifying your browser and internet device.

Details of the third party cookie set by this website and what it does is explained below:

Name	Domain	Description	Expiry
1P_JAR, CONSENT, NID	.google.com	Set by Google. This group sets a unique ID to remember your preferences and other information such as website statistics and track conversion rates. Google's policies can be viewed at <a href="https://policies.google.com/technologies/types">https://policies.google.com/technologies/types</a>	Various

You can control this cookie by following the guidance below.

### More information about cookies

To learn more about cookies, including how to manage them and how they affect your online activities, please visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

You can also learn how to control cookies on different browsers at [www.aboutcookies.org/how-to-control-cookies/](http://www.aboutcookies.org/how-to-control-cookies/), or if you want to know how to delete cookies, visit [www.aboutcookies.org/how-to-delete-cookies/](http://www.aboutcookies.org/how-to-delete-cookies/)

To opt out of being tracked by Google Analytics across all websites, you can visit <http://tools.google.com/dlpage/gaoptout>

The Internet Advertising Bureau website (Your Online Choices) which you can visit at [www.youronlinechoices.com/uk/](http://www.youronlinechoices.com/uk/) allows you to install opt-out cookies across different advertising networks.

New technologies such as Mozilla's Do Not Track ([www.mozilla.org/en-GB/firefox/dnt/](http://www.mozilla.org/en-GB/firefox/dnt/)) allow you to tell websites not to track you.

It is noted however that blocking cookies may, on occasion, reduce the functionality of a website or prevent access, depending on the browser options which are selected.

## What information are you collecting about me?

The data we collect and that are provided to us are necessary to provide you with the benefits and services that are being provided or offered to you. The exact details may vary depending on the employee benefits options being provided. Listed are some examples of when we collect data that is provided directly by yourself, but not be limited to:

- Information you provide by completing forms on the Website. We may also ask you for information when you report a problem with our Website.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our site including but not limited to, traffic data, location data, weblogs, and other communication data.
- Details such as your name, company name, telephone number, email address and password.

We may need this information to provide you with access to the Website and to ensure we can identify you.

## How are you using my personal data?

Information that you, or your employer, or administering authority, provide to us (which may include personal data and/or sensitive personal data) will be used only for the following purposes (and subject to any preferences you have notified us of):

- We may retain and disclose your personal data to comply with any statutory, legal, or regulatory obligations.
- We may disclose your personal data to third parties if we are under a duty to disclose or share such information to comply with any legal obligation, or to enforce or apply our Website Terms of use, or other agreements; or to protect the rights, property or safety of Capita, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We intend to continue improving the content and function of our Website. For this reason, we may monitor customer traffic patterns and site usage to help us improve the design and layout of our site and provide content of interest to you.

We shall keep your information for a reasonable period for the purposes outlined above.

## Why are you collecting this information?

We gather this information to allow us to provide you with updated details of your employee benefits, assist you in applying for further benefits or products, and processing those applications (where applicable), and generally ensure the smooth running of your employee benefits.

The information is also used by us to communicate with you on any matter relating to your employee benefits and the provision of the services in general – we have a legal obligation to send you these types of communications as they contain important Scheme related information and therefore, you're unable to opt out. This will ensure you're kept up to date on EAPF information relating to your pension. We may also use your data to provide you with information that may be of interest, however, you will always have the right to unsubscribe from receiving this type of communication. Your employer may have provided your email address details to Capita for the purpose of providing our services. Email messages sent over the internet cannot be guaranteed to be completely secure as they may be subject to possible interception or loss. If you do not want Capita to contact you on your email address, please contact your employer.

We may also wish to provide you with information about special features of our Site or other services. This may be by email or by SMS text messaging if you have registered for this service. If you do not want to receive this information, please contact your employer.

We never use or share any personally identifiable information provided to us online in ways unrelated to the ones described on our Site, this Privacy Notice or our Cookie Policy.

## What is your legal basis for processing my information?

The controller will have a legal basis for providing us with your information to process and they should provide you with details of this in their privacy notice to you.

As a processor your information is processed by us on the basis of instructions from and a contract with the controller e.g., your employer or administering authority to provide pension administration services.

## Who might you share my information with?

Where we provide pension administration or benefits services and you apply for any additional products or services offered through our Site, we will pass your personal details as necessary to the provider of those products and services to the extent necessary for you to receive those products or services. Thereafter, the provider may correspond with you directly to provide those services.

Once a provider has received your personal information, they will usually have a direct relationship with you and use your personal data in accordance with their terms and conditions and privacy policy.

Examples of the types of providers used are:

- Insurance Companies - for the provision of medical insurance or Life assurance

To provide our services to your employer and or administering authority we sometimes use third parties such as IT systems and software providers or print and document management companies.

In addition, your details may be disclosed to your employer or administering authority for Capita to provide the services to you.

If Capita is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchasers' advisers and will be passed on to the new owners of the business.

## **Where might you transfer my information outside of the EEA?**

Your personal data will not be transferred by us outside of the European Economic Area (EEA) unless specifically agreed with the controller. Where that is the case, you will be separately notified.

## **How long do you keep hold of my information?**

Our standard policy is to hold your data for a maximum of 7 years after the end of our agreement to provide services to your employer or administering authority after which it will be securely destroyed.

## **What if I choose not to give you my personal information?**

If you do not wish us to process your personal data to use our Site, please use the contact details on the Site homepage. However, in certain circumstances the controller e.g., your employer may be under a legal obligation to process your personal data e.g., for automatic enrolment into a pension scheme and to manage opt-outs in which case we may have to continue to process your personal data.

## **Will you process my information for purposes I may not be aware of?**

Where agreed with your employer or administering authority we may anonymise your personal information and use it for data analytical purposes.

We may also use aggregate information and statistics for the purposes of monitoring website usage and to help us develop our Site and our services and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify any individual.

From time to time, we may provide your information that we collect and store during normal use of our Site to our customer service agencies for research and analysis purposes so that we can monitor and improve the services we provide. Such use does not result in any personally identifiable data, other than contact details, being collected, stored or transferred to such agencies. We, or our agents and sub-contractors, may contact you by post, email or telephone to ask you for your feedback and comments on our services.

One way in which we gather this information is by using cookies. Please see our Cookie Policy for more information.

## **What rights do I have?**

Under Data Protection regulations you have a number of rights. These can be exercised by contacting your employer or administering authority as the Controller of your information.

### **The right to be informed**

This includes an obligation to explain to you how your information is used. This Privacy Notice provides you with this explanation in relation to the information processed by us when providing pension scheme administration services to your employer or administering authority.

### **The right of access**

You have the right to obtain confirmation that your information is being processed and to obtain access to your information (e.g., by receiving a copy of it).

### **The right to rectification**

You have the right to have your information corrected if it is inaccurate or incomplete.

### **The right to erasure** (also known as the 'right to be forgotten')

You have the right to request the deletion or removal of your information in certain circumstances. Please note that there may be circumstances where you ask for your information to be deleted but both us and your employer or administering authority are legally entitled to retain it.

### **The right to restrict processing**

You have the right to request the processing of your information is restricted in certain circumstances. Again, there may be circumstances where you ask your employer administering authority to restrict the processing of your information, but they are legally entitled to refuse that request.

### **The right to data portability**

You have the right to receive the information you have provided in a usable electronic format and or request it is transmitted to a third party where this is technically feasible.

### **The right to complain to the Supervisory Authority**

You have the right to make a complaint with the Information Commissioner's Office (ICO) if you think that any of your rights have been infringed. You can visit the ICO website at [www.ico.org.uk](http://www.ico.org.uk)