



Government
Actuary's
Department

Government Actuary's Department (GAD) Privacy Notice

GAD collects and processes some personal information for the purposes described in this Privacy Notice. Personal information means any information describing or relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

GAD (collectively referred to as "GAD", "we", "us") takes its data protection and privacy responsibilities seriously. This privacy notice explains *how* we receive, use and share personal information in the course of our business activities, including:

- [What categories of personal data we hold, what types of personal information we receive and when and why we use it.](#)
- [How we share personal information within GAD and with our service providers, regulators and other third parties](#)
- [Explaining more about subscriptions](#)
- [How we receive data](#)
- [Transferring personal information globally](#)
- [How we protect and store personal information](#)
- [Legal rights available to help manage your privacy](#)
- [How you can contact us for more support](#)

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this notice. If we make significant changes to this privacy notice, we will seek to inform you by notice on our website or email ("Notice of Change").

You might find external links to third party websites on our website. This privacy notice does not apply to your use of a third-party site.

The Government Actuary's Department is proud to be accredited under the Institute and Faculty of Actuaries' [Quality Assurance Scheme](#). Our website describes [the standards we apply](#).



A separate notice covers our policy on data relating to GAD employees and former employees.

What personal information we receive and when and why we use it

In this section you can find out more about

- the categories of data we receive

and within each of those categories of data

- the types of personal information we receive when we receive personal information
- how we use personal information
- the legal basis for using personal information

The categories of data we receive

We may receive information about you if you:

1. are a member of a pension scheme we provide actuarial advice to;
2. are involved in a compulsory transfer of employment and/or pension arrangements, and we advise any party involved;
3. have an outstanding debt relating to funding of higher education or professional and career development, or have made repayments in relation to such debts in the past;
4. have made a claim in relation to any public sector risk pooling arrangements which we advise on;
5. are a member of the UK contributory social security system (we only receive data for a sample of the relevant population/membership so may not receive data for an individual);
6. are a claimant in an existing or contemplated legal case in which GAD has been commissioned to act as a witness or to advise on the implications of the legal case;
7. have signed up to receive updates / newsletters from GAD;
8. have contacted GAD in relation to some of our activities or published information and have provided us with your personal information;
9. are a member of a national insurance scheme or programme (including, but not limited to, national or government pension scheme, social security or insurance scheme, health service or insurance scheme, long-term care scheme, employment injuries or workers' compensation scheme, provident scheme) in a country or overseas territory for which GAD has been commissioned to carry out actuarial services in relation to that scheme or programme;

10. work with us as a business partner¹; or

11. apply for a post at GAD.

We additionally collect and retain data about GAD employees. The way in which we deal with this data is covered in a separate document.

The types of personal data we receive, when we receive it, how we use it and the legal basis for using that data

1. Members of a pension scheme

The data we receive is limited to the information required to carry out each particular task we are required to undertake. This may include a unique identifier, date of birth, gender, pension and salary details. It also generally includes the reason for any change in membership status. The vast majority of the data we receive is used to accurately value the cost of providing pension benefits within the pension scheme, which can vary depending on membership status and reason for change in status. In order to protect your personal information, we will encrypt unique identifiers on receipt and remove unneeded information from our valuation datasets.

Occasionally we are required to carry out an individual calculation to assist with the administration of a member's benefits, in such cases we will retain the unique identifier supplied by the administrator. In addition, where we have been commissioned to provide pension accounting disclosures in relation to individuals we typically receive and retain the unique identifier supplied and name if needed to support the necessary disclosures.

Personal data is received from pension scheme administrators as and when it is needed for a particular task. For example, data used for actuarial valuations is received soon after the effective date of the valuation.

We receive personal data in order to carry out statutory, contractual, or regulatory obligations we hold in relation to your pension scheme. This can include actuarial valuations, statistical analysis and financial modelling.

In some circumstances we share certain elements of data received for pension valuation purposes with other parties. This includes other government departments and industry bodies for research purposes. In this event all personal data is removed prior to onwards transmission.

¹A "business partner" is someone who has been sent our terms of business

2. Individuals involved in a compulsory transfer of employment and/or pension arrangements

The data we receive is limited to the information required to:

- assess the value of the existing and receiving pension arrangements
- assist in determining any pay uplifts to be awarded to transferring staff
- assist in determining any credits that are to be awarded in the receiving scheme
- advice on the associated financial implications of awarding those credits
- assist in the preparation of communication material for transferring staff
- facilitate the administration processes necessary to complete the pensions aspects of the transfer
- assist with other ad hoc work connected with a transfer or employment and/or transfer of pension arrangements

The data will generally include a unique identifier, date of birth, gender, service and salary details but may include other pension scheme membership information relevant to determining the value of transferees' current or expected future pension entitlements.

Our work requires us to be able to identify individuals within the transfer and communicate details of data held for that individual with other parties involved in the transfer. As such we will retain the unique identifiers we receive. Such data as is shared with other parties is provided to enable them to discharge a statutory, contractual, or regulatory obligation. GAD expects such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security.

We receive personal data in order to carry out a statutory, contractual, or regulatory obligation in relation to pensions in compulsory transfers of employment. This includes the items and processes listed above. This data is usually received from the administrators of the paying pension scheme but may also be received from other sources who may hold the relevant information, such as the receiving pension scheme or employers. GAD may also send data to relevant parties in connection with the items and processes listed above (also see Section below entitled "SHARING PERSONAL INFORMATION WITHIN GAD, WITH OUR SERVICE PROVIDERS").

Individuals with an outstanding debt relating to funding of higher education or professional and career development, or have made repayments in relation to such debts in the past

3. The data we receive is limited to the information required to carry out each particular task we are required to undertake. This may include an anonymised unique identifier, age, month and year of birth, and the first part (but not all) of the individual's postcode. We receive information on individuals' taxable earnings, relevant debt repayments and balances, and the academic study related to the loan (including the place of education, field of study and the course length and level).

This information is needed in order to model projected future debt repayments to support the relevant department on any sales of tranches of those debt repayments. We receive this data when we are required to support the Department by updating our modelling or carrying out any other analysis which they request based on latest data. This work falls within the Public Task basis for processing in Article 6 of the GDPR.

In order to protect your personal information and because it is not necessary for our work, we do not receive any information that would enable us to identify individuals (other than the data set out above). For example, we do not receive any individuals' names, full dates of birth, National Insurance numbers, full addresses, tax records or Unique Tax Reference numbers.

4. Individuals having made a claim in relation to any public sector risk pooling arrangements which we advise on

The data we receive is limited to the information required to carry out each particular task we are required to undertake. This may include a claim reference number, the age and gender of the claimant and information relating to the claim (for example the location of the claim and relevant circumstances of the claim that are likely to affect the determination of the amounts paid in respect of that claim).

This information is needed in order to model projected future claim payments to support the relevant parties in their administration of these schemes in accordance with the relevant legislation, and on their compliance with public finance requirements. We receive this data when we are required to update our modelling or carry out any other analysis requested in support of our clients' responsibilities. This work falls within the Public Task basis for processing in Article 6 of the GDPR.

In order to protect your personal information and because it is not necessary for our work, we do not receive any information that would enable us to identify individuals (other than the data set out above). For example, we do not receive any individuals' names, National Insurance numbers, addresses or postcodes.

5. Members of the UK contributory social security system

The data we receive is limited to the information required to carry out each particular task we are required to undertake. This will typically include a unique identifier, date of birth or age, gender, marital status, geographic location, and details of social security membership including employment, earnings, contributions, pension or other benefit. It also generally includes information about changes of status leading to different benefit entitlements. In order to protect your personal information, unique identifiers are encrypted before transfer to GAD.

This information is needed to access the expected benefit expenditure from the system and to accurately value the cost of providing benefits within the scheme, which can vary depending on membership status and reason for change in status.

We receive personal data in order to carry out statutory, contractual, or regulatory obligations we hold in relation to the Great Britain and Northern Ireland National Insurance Funds. This includes undertaking actuarial valuations, statistical analysis and financial modelling. This work falls within the Compliance with a Legal Obligation basis for processing in Article 6 of the GDPR. Processing of special category personal data (limited to data concerning health, for the purpose of accurately valuing the cost of providing benefits within the scheme) is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.

Personal data is received from other government departments or public bodies at regular intervals or when it is needed for a particular task. We only receive data for a sample of the relevant population/membership. Different types of data we receive cover different samples.

6. A claimant in an existing or contemplated legal case in which GAD has been commissioned to act as a witness or to advise on the implications of the legal case

The data we receive is limited to the information required to fulfil our duties as a witness or advisor. This will generally include a unique identifier, name, date of birth or age, gender, marital status, and details of relevant scheme membership including for example service, salary and pension. It might also include information on the reason for any change in membership status. This information is needed to accurately value the cost of providing benefits within a scheme, which can vary depending on membership status and reason for change in status.

Our work requires us to be able to identify individuals in scope of the legal proceedings and communicate details of data held for that individual with other parties involved in the legal proceeding. As such we do not encrypt the unique identifiers we receive. Where GAD shares the data with third parties GAD expects such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security.

We receive personal data in order to fulfil our duties as a witness or advisor in legal proceedings in relation to actuarial matters for example about the costs of different levels of pension provision. This data is received from the courts / legal advisers during the legal proceeding.

7. Subscribers to GAD newsletters / articles

The data we receive is determined by the individual providing such data.

This data is used for the purpose of conducting regular business activities such as distributing articles and publications. This data is collected with the explicit consent of the individual and they are free to unsubscribe at any time, at which point their data will be deleted.

8. A private individual contacting GAD (other than under category 7)

The data we receive is determined by the individual providing such data.

That data is used to discharge any statutory, contractual, or regulatory obligations associated with the communication.

The data is deleted 2 years after responding to the request made.

9. Members of an overseas national insurance scheme or programme

The data we receive is limited to the information required to carry out each particular task we are required to undertake. This may include a unique identifier, date of birth or age, gender, marital status, and details of scheme membership, with equivalent information for spouses or dependents if relevant. It also generally includes information on the reason for any change in membership status. This information is needed to accurately value the cost of providing benefits within the scheme, which can vary depending on membership status and reason for change in status.

Personal data is received from the relevant holding entity as and when it is needed for a particular task.

In order to protect your personal information, we encrypt unique identifiers on receipt.

We receive personal data in order to carry out contractual or regulatory obligations we hold in relation to the national insurance scheme or program. This can include actuarial valuations, statistical analysis and financial modelling. This work falls within the Public Task basis for processing in Article 6 of the GDPR. Processing of special category personal data (limited to data concerning health, for the purpose of accurately valuing the cost of providing benefits within the scheme) is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.

10. Anyone working with us as a business partner

We collect your name and business contact details so that we can communicate to you as a business partner. We may contact you over the course fulfilling our responsibilities to you as a client, or we may send you material on GAD and other information we deem relevant to your interests.

11. Anyone Applying for a Post

We collect your personal details in order to process your job application.

This processing is necessary to take steps at the applicant's request to enter a contract of employment.

GAD also considers that it has a legitimate interest in fully assessing applications for employment to ensure that only suitable and appropriate candidates are both assessed and selected. GAD considers that this is important to ensure that GAD identifies the right people for its business who will be able to contribute to its operations and culture.

Such data is retained for 1 year.

If you would like to find out more about the legal basis for which we process personal information please [contact us](#).

Sharing personal information within GAD, with our service providers

In this section you can find out more about how we share personal information:

- within GAD
- with third parties that help us provide our products and services; and
- our regulators

We share your information in the manner and for the purposes described below:

- i. within GAD, where such disclosure is necessary to provide you with our services or to manage our business. We have operational policies to manage how personal information is shared within GAD and in most cases, sharing is by means of providing staff with access to secure network areas.
- ii. with third parties who help manage our business and deliver services. GAD expects such third parties to process any data disclosed to them in accordance with applicable law, including with respect to data confidentiality and security. Such parties include IT service providers who help manage our IT and back office systems;
- iii. with our regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.

Where GAD shares data with other bodies (for example for research purposes) we ensure that no individual can be identified in such data.

How we use personal information to keep you up to date

In this section you can find out more about

- how we use personal information to keep you up to date
- how you can manage your subscription preferences

If you are a business partner, we may use personal information to let you know about GAD services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to communicate with you.

Non-business partner contacts are invited to opt-in to subscribe to our communications.

How you can manage your preferences

To protect privacy rights and to ensure you have control over how we manage communications with you:

- we will take steps to limit communications to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;
- you can ask us to stop at any time - you can ask us to stop sending communications, by contacting us at [contact us](#).

How we receive or send data

Most of the personal data we use in our work is transmitted from or to clients, or service providers, using an Egress Switch Secure Workspace. All data transmitted with Egress Switch is encrypted in transit and at rest using AES256-bit encryption, in fully accredited data centres. Data receipt at GAD is managed by a single team who check, and if appropriate redact or encrypt data items before the data is released to our actuarial teams.

Other transmission routes are used in the following circumstances.

[Data categories 1 \(pension scheme members\), 2 \(data relating to compulsory staff transfers\), 6 \(where GAD is acting as a witness, or advising, in legal proceedings\)](#)

Where necessary, generally in relation to clarifying aspects of a single member or small group of members' details or entitlement, Outlook may be used for transmission of relevant details between GAD and a third party. The GAD recipient of such information is responsible for ensuring any resultant data received is removed from within Outlook and securely stored on the network.

[Data category 8 \(individual contacting GAD\)](#)

Where an enquirer to GAD provides personal information to enable GAD to respond that data will be received by whatever means are chosen by the individual.

[Data category 10 \(business partner\)](#)

GAD receives data by whatever means are chosen by the business partner.

[Data category 11 \(Job applicant\)](#)

GAD receives data by whatever means are chosen by the job applicant.

Transferring personal information globally

We use the same secure platforms for receiving data from our international clients as we do for UK and other European clients.

How we protect and store your information

Security

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to reduce the risk of accidental destruction or loss, or the

unauthorised disclosure or access to such information as appropriate to the nature of the information concerned.

Measures we take include placing confidentiality requirements on our staff members and Service Providers; destroying personal information if there is no longer a business need for its retention; establishing a controlled mechanism for the receipt of personal data; encrypting record identifiers; ensuring that personal data is limited to information needed for the purpose it was requested.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was received, as explained in this notice. In some circumstances we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements. Other than circumstances discussed below, all personal data is destroyed 7 years following receipt.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

Exceptions

Data categories 1 (pension scheme members), 2 (data relating to compulsory staff transfers), 6 (where GAD is acting as a witness, or advising, in legal proceedings)

Data provided for individual calculations including for staff transfer cases will, except in exceptional circumstances, be retained for up to 20 years from the date the individual calculations and any associated work is complete.

Data category 7 (subscriber) and 10 (business partner)

GAD will retain contact details unless in receipt of a permanent failed delivery notification. GAD will unsubscribe business partners from any or all publications if requested.

Data category 8 (individual contacting GAD)

Where an enquirer to GAD provides personal information to enable GAD to respond that data will be securely retained for 2 years.

Data category 11 (Job applicant)

GAD will retain personal data relating to a job application for 1 years. This is to allow time for any possible disputes to be resolved.

Legal rights available to help manage your privacy

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information.

- To access personal information
- To rectify / erase personal information
- To restrict the processing of your personal information
- To transfer your personal information
- To object to the processing of personal information
- To object to how we use your personal information for subscription purposes
- To obtain a copy of personal information safeguards used for transfers outside your jurisdiction
- To lodge a complaint with your local supervisory authority

If you ask us what personal information we hold about you we may request you provide additional information to confirm your identity and for security purposes, before disclosing the personal information requested. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by [contacting us](#). Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold. This notice provides the information we are required to disclose to meet your right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was received; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or

- it has been processed unlawfully; or
- to comply with a legal obligation to which GAD is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation (as is the case for most data envisaged in this Notice); or
- for the establishment, exercise or defence of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was received, but we still need it to establish, exercise or defend legal claims; or
 - you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your [local supervisory authority](#) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

Contact us

The primary point of contact for all issues arising from this privacy notice, is our Data Protection Officer. GAD's Data Protection Officer is Jim Conway who can be contacted in the following ways:

Email: Data.Privacy@gad.gov.uk

Telephone: 020 72112601

Jim Conway
Data Protection Officer
Government Actuary's Department
Finlaison House
15-17 Furnival Street
London
EC4A 1AB

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact our Data Protection Officer (above). We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

July 2022