

Privacy and Data Policy - PMI

Introduction

Welcome to The Pensions Management Institute's (PMI) Privacy and Data Policy. PMI is committed to protecting your personal data and respecting your privacy in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable UK laws. This policy outlines how we collect, process, store, share, and protect your personal data when you interact with us, including through our websites at www.pensions-pmi.org.uk, www.pmipinnacleawards.co.uk, and www.pmitap.org. Our services are not intended for children, and we do not knowingly collect data relating to individuals under 16.

Please read this policy alongside any additional privacy or fair processing notices we may provide during specific interactions to ensure you understand how and why we use your data. This policy supplements, but does not override, those notices.

1. Important Information and Who We Are

Purpose of This Policy This policy provides detailed information on how PMI, as the data controller, collects, processes, and shares your personal data. It also informs you of your rights under UK data protection law.

Controller PMI is the data controller responsible for your personal data (referred to as "PMI", "we", "us", or "our" in this policy). PMI is affiliated with eight regional associations, but this policy applies solely to PMI and visitors to our websites, regardless of your location in the UK. For information on regional associations' privacy policies, please contact your regional representative.

We have appointed a Data Privacy Manager to oversee compliance with this policy. For questions or to exercise your legal rights, please contact:

- Full Name of Legal Entity: The Pensions Management Institute
- Data Privacy Manager: Anjan Bose
- Email: info@pensions-pmi.org.uk
- Postal Address: 6th Floor, 9 Appold Street, London, EC2A 2AP
- Telephone: +44 (0) 207 247 1452

Changes to This Policy We regularly review this policy, with this version updated in June 2025. We will notify you of significant changes via email or our websites. Please inform us promptly if your personal data changes to ensure our records remain accurate.

Third-Party Links Our websites may contain links to third-party websites, plug-ins, or applications. We are not responsible for their privacy practices, and we encourage you to review their privacy policies upon visiting.

2. The Data We Collect About You

Personal data refers to any information relating to an identified or identifiable individual. It does not include anonymised data where identity cannot be inferred.

We may collect, use, store, and share the following categories of personal data:

- Identity Data: First name, maiden name, last name, username, marital status, title, date of birth, gender.
- Contact Data: Billing address, delivery address, email address, telephone numbers.
- Financial Data: Bank account and payment card details.
- Transaction Data: Details of payments to/from you, and products/services purchased.
- Technical Data: IP address, login data, browser type/version, time zone, location, operating system, and device technology.
- Profile Data: Username, password, purchases, nomination details, interests, preferences, feedback, survey responses.
- Usage Data: Information on how you use our websites, products, and services.
- Marketing and Communications Data: Preferences for receiving marketing and communication preferences.

We also process Aggregated Data (e.g., statistical or demographic data) for analytical purposes. Aggregated Data is not personal data unless combined with identifiable information, in which case it is treated as personal data under this policy.

We do not collect Special Categories of Personal Data (e.g., race, ethnicity, health, or political opinions) unless required for regulatory purposes (e.g., qualifications). We also do not collect data on criminal convictions or offences unless legally mandated.

If You Fail to Provide Personal Data If we are legally or contractually required to collect personal data and you do not provide it, we may be unable to perform the contract (e.g., provide services). We will notify you if this occurs.

3. How We Collect Your Personal Data We collect data through:

- Direct Interactions: When you provide Identity, Contact Data, Financial Data, or other data by:
 - Applying for services (e.g., membership, qualifications);
 - Accessing your account;
 - Submitting/being nominated for awards;
 - Subscribing to services/publications;
 - Attending events (e.g., seminars, webinars);

- Requesting marketing;
- Entering competitions or surveys;
- Providing feedback.
- Automated Technologies: We collect Technical Data via cookies, server logs, or similar technologies. See our cookie policy at <https://www.pensions-pmi.org.uk/privacy/cookies.html>.
- Third Parties or Public Sources: We receive data from:
 - Analytics providers (e.g., Google Analytics);
 - Advertising networks (e.g., LinkedIn);
 - Payment and delivery services (e.g., SagePay);
 - Email software providers (e.g., Dotmailer);
 - Publicly available sources.

4. How We Use Your Personal Data

We process personal data only where permitted by law, typically under the following bases:

- Performance of a Contract: To fulfil contractual obligations with you.
- Legitimate Interests: To pursue our business interests, provided your rights do not override these.
- Legal Obligation: To comply with legal or regulatory requirements.
- Consent: For specific purposes, such as third-party marketing to non-members.

Below is a summary of purposes, data types, and lawful bases for processing:

Purpose/Activity	Type of Data	Lawful Basis
Register or renew membership	Identity, Contact, Financial, Transaction	Performance of a contract
Process and deliver orders (e.g., manage payments, recover debts)	Identity, Contact, Financial, Transaction, Marketing and Communications	(a) Performance of a contract (b) Legitimate interests (debt recovery)
Manage relationships (e.g., notify changes, request reviews, provide benefits)	Identity, Contact, Profile, Marketing and Communications	(a) Performance of a contract (b) Legal obligation (c) Legitimate interests (record updates, customer insights)

Process nominations, sponsorships, or publicise judges	Identity, Contact, Profile	(a) Legitimate interests (administer awards) (b) Performance of a contract
Enable prize draws, competitions, or surveys	Identity, Contact, Profile, Usage, Marketing and Communications	(a) Performance of a contract (b) Legitimate interests (product development)
Administer and protect business/websites	Identity, Contact, Technical	(a) Legitimate interests (business operations, security) (b) Legal obligation
Deliver relevant content/advertisements	Identity, Contact, Profile, Usage, Marketing and Communications, Technical	Legitimate interests (marketing strategy)
Use data analytics to improve services	Technical, Usage	Legitimate interests (business development)
Make product/service recommendations	Identity, Contact, Technical, Usage, Profile	Legitimate interests (business growth)
Send event information to non-members (with consent)	Identity, Contact	Consent
Provide member benefits	Identity, Contact, Marketing and Communications	Legitimate interests (member obligations)
Share learner data with exam provider	Technical, Usage	Consent
Share learner data with their employer	Technical, Usage	Consent

Promotional Offers We may use Identity, Contact, Technical, Usage, and Profile Data to tailor marketing based on your preferences. You will receive marketing if you have requested information, purchased services, or provided details for nominations/competitions and have not opted out.

Third-Party Marketing We require your explicit opt-in consent before sharing your data with external companies for marketing purposes.

Opting Out You can opt out of marketing at any time by contacting us. This will not affect data processed for contractual or legal obligations.

Cookies You can manage cookie preferences via your browser. Disabling cookies may affect website functionality. See our cookie policy for details.

Change of Purpose We will only use your data for the purposes collected unless a compatible purpose arises. For unrelated purposes, we will notify you and explain the legal basis.

5. Sharing Your Personal Data.

We may share your personal data with the following parties for the purposes outlined above, ensuring compliance with UK GDPR:

- **Internal Teams:** PMI employees or contractors with a business need, bound by confidentiality.
- **Employers:** Organisations who enrol employees onto PMI exams on their behalf, or an employer which requests a learner exam result and where consent has been given. (e.g. PMI number, email address, exam unit, exam results).
- **External Third Parties:**
 - IT and system administration service providers (e.g., hosting services).
 - Exam providers (exam hosting platform).
 - Professional advisers (e.g., examiners, lawyers, auditors) acting as processors or joint controllers.
 - HM Revenue & Customs or other regulators for legal reporting.
 - Publishers or fulfilment companies delivering member benefits (e.g., magazines).
 - Payment processors (e.g., SagePay) for transactions.
 - Analytics or marketing platforms (e.g., Google Analytics, Dotmailer) with appropriate safeguards.
- **Business Transfers:** Third parties in case of business sale, merger, or acquisition, ensuring data is used per this policy.

All third parties are required to process data securely, solely for specified purposes, and in accordance with our instructions. We conduct due diligence and use data processing agreements to ensure GDPR compliance.

International Transfers We do not transfer personal data outside the UK. If this changes, we will implement appropriate safeguards (e.g., UK International Data Transfer Agreements) and notify you.

6. Data Security

We have implemented robust security measures to prevent unauthorised access, loss, alteration, or disclosure of your personal data, including:

- Encryption and access controls.
- Regular security assessments.
- Limited access to data by authorised personnel only.

We have procedures to address suspected data breaches and will notify you and the Information Commissioner's Office (ICO) where required by law.

7. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting obligations. Retention periods vary based on:

- The amount, nature, and sensitivity of the data.
- Potential risks from unauthorised use.
- Applicable legal requirements.

For specific retention periods, please contact our Data Privacy Manager.

8. Your Legal Rights Under UK GDPR and the Data Protection Act 2018

You have the following rights:

- Access: Obtain a copy of your personal data and details of our processing.
- Correction: Rectify inaccurate or incomplete data.
- Erasure: Request deletion where there is no lawful reason for continued processing.
- Objection: Object to processing based on legitimate interests or for direct marketing.
- Restriction: Request suspension of processing in certain scenarios (e.g., to verify accuracy).
- Data Portability: Receive your data in a structured, machine-readable format or have it transferred to another controller.
- Withdraw Consent: Revoke consent at any time, without affecting prior processing.

To exercise these rights, contact our Data Privacy Manager. We may request identity verification to protect your data. We respond within one month, though complex requests may take longer, and we will keep you informed.

No Fee Usually Required Exercising your rights is generally free, but we may charge a reasonable fee or refuse requests that are unfounded, repetitive, or excessive.

Complaints If you have concerns, please contact us first. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at www.ico.org.uk or by calling 0303 123 1113.

9. Glossary

Lawful Bases

- Legitimate Interests: Processing necessary for our business interests, balanced against your rights.
- Performance of a Contract: Processing required to fulfil contractual obligations.
- Legal Obligation: Processing to comply with legal requirements.
- Consent: Processing based on your explicit agreement.

External Third Parties

- Service providers (e.g., IT, exam providers, payment processors).
- Employer (learner employer)
- Professional advisers (e.g., lawyers, auditors).
- Regulators (e.g., HMRC).
- Publishers and fulfilment companies for member benefits.

Change log

Date	Details of change	Learners applicable
27/06/2025	Learner details shared with exam provider	All active learners
27/06/2025	Learner exam results shared with employer, once consent provided	All active learners