

TISCO Financial Planning Ltd (Our Firm), is a Company Registered in England and Wales, number 5479998.

## Why should you read this document?

TISCO Financial Planning Ltd (TISCO) is a firm of independent financial advisers and employee benefits consultants and has a contract with AECOM to provide advice and consultancy services on the group personal pension scheme, other related pension matters and general financial wellbeing services. TISCO are therefore the servicing agent for the AECOM Retirement Savings Plan (ARSP) currently with Scottish Widows and as such, will have access to Your Personal Data whilst you are an active employee of AECOM.

During your employment at AECOM, we are provided with Your Personal Data pertaining to your membership of the ARSP and/or other financial benefits offered by AECOM. This document is important as it allows us to explain what we do with Your Personal Data, and the various rights you have in relation to Your Personal Data.

We may use this data to help us provide our services to AECOM and when required, to provide employees with information, guidance and advice on pension schemes and other retirement related or financial wellbeing issues.

When you leave AECOM's employment, TISCO will cease to be the servicing agent and will not have access to new personal data, unless you choose to appoint us on a personal/private basis.

## Why is your personal information required?

Your personal information is required in order for us to provide our services to AECOM, or to enable us to take necessary steps at your request, or your employer's request, prior to entering into a contract and to perform such a contract. This may include advising you on your retirement and transfer options, obtaining pension valuations and investment information, identity checks, preventing and detecting fraud, money laundering or other crimes and any other requirements in accordance with rules set by the Financial Conduct Authority (FCA) or other applicable legislation.

We understand our obligations regarding your fundamental right to a private life and have implemented systems and controls to ensure your rights and freedoms are protected.

TISCO Financial Planning undertake to meet our obligations under the Data Protection Act (DPA) 2018, the Privacy and Electronic Communications Regulations (PECR) and the EU General Data Protection Regulation (GDPR).

## What do we mean by "Your Personal Data"

Your Personal Data means any information that describes or relates to your personal circumstances. Your Personal Data may identify you directly, for example your name, address, date of birth, National Insurance number. Your Personal Data may also identify you indirectly, for example, your employment situation, your physical and mental health history, or any other information that could be associated with your cultural or social identity.

In the context of our services to AECOM and providing you with assistance in relation to your pension or other requirements, Your Personal Data may include:

- Title, names, date of birth, gender, nationality, civil/marital status, contact details, addresses and documents that are necessary to verify your identity;
- Information connected to a product or service, e.g. your Scottish Widows pension;-
- Information about your contact with us, e.g. meeting, phone calls, emails/letters, office visits;
- Information that is automatically collected e.g. via cookies upon visiting our website;
- Employment and remuneration information, (including salary/bonus schemes/overtime/sick pay/other pension or benefits), employment history and tax position;-
- Information you may provide us about other people, e.g. joint applicants, or beneficiaries for products;-
- Information on children, e.g. where a child is named as a beneficiary;
- Any pre-existing pension/investment/mortgage/finance and/or insurance product that you share information about; and-
- Information classified as 'sensitive' personal information, e.g. relating to your health, race or ethnic origin. This information will only be collected and used where it is needed to provide a product or service you have requested or to comply with our legal obligations.

## Who will process your personal information?

Your personal information will be initially processed by advisers & staff of TISCO Financial Planning. All parties will process Your Personal Data in accordance with this Privacy Notice.

### The basis upon which TISCO will deal with Your Personal Data

When we speak with you about your pension, retirement plans or financial requirements we do so on the basis that both parties are entering a contract for the supply of services or information. In order to perform that contract, and to arrange the products or service you require, we have the right to use Your Personal Data for the purposes detailed below.

Alternatively, either in the course of initial discussions with you or when the contract between us has come to an end for whatever reason, including you leaving the employ of AECOM, we have the right to use Your Personal Data provided if it is in our legitimate business interest to do so and your rights are not affected. For example, we may need to respond to requests from pension providers and our Compliance Service Provider relating to the guidance or advice we have given to you, or to make contact with you to seek feedback on the service you received.

On occasion, we will use Your Personal Data for contractual responsibilities we may owe our regulator, The Financial Conduct Authority, or for wider compliance with any legal or regulatory obligation to which we might be subject. In such circumstances, we would be processing Your Personal Data in order to meet a legal, compliance or other regulatory obligation to which we are subject.

Though there are some legal exceptions, if we wish to process Your Personal Data for any other unrelated purpose than those we have informed you about we will notify you.

### The basis upon which we will process certain parts of Your Personal Data

In some circumstances, e.g. ethical pension investments or insurance, we may require information about your ethnic origin, your health and medical history (**Your Special Data**). We will record and use Your Special Data in order to make enquiries of insurance/investment solutions in relation to insurance products that may meet your needs and to provide AECOM with advice/guidance regarding the suitability of any product that may be available to you.

We will use special Data and any Criminal Disclosures in the same way as Your Personal Data generally, as set out in this Privacy Notice. Information on Special Category Data and Criminal Disclosures must be capable of being exchanged freely between insurance intermediaries such as our Firm, and insurance providers, to enable customers to secure the important insurance protection that their needs require.

### How do we collect Your Personal Data?

We may collect your personal information from a variety of ways, including:

- from the pension provider or product provider, e.g. Scottish Widows;-
- from AECOM;
- directly from you via a telephone conversation with us;
- emails, letters or forms you address to us;
- an application form for a product or service;
- meetings with us, including completing questionnaires; and
- via our website forms or via our social media pages.

With regards to electronic ID checks we would not require your consent but will inform you of how such software operates and the purpose for which it is used.

### What happens to Your Personal Data when it is disclosed to us?

In the course of handling Your Personal Data, we will:

- Record and store Your Personal Data in our paper files, mobile devices and on our computer systems (websites, email, hard drives, and cloud facilities). This information can only be accessed by employees and consultants within our Firm and only when it is necessary to provide our service to you or AECOM and to perform any administration tasks associated with or incidental to that service;
- Submit Your Personal Data to Product and Pension providers and/or Insurance Product providers, both in paper form and on-line via a secure portal. The provision of this information to a third party may be required to allow us to perform our contractual duties to AECOM; and -
- Use Your Personal Data for the purposes of responding to any queries you may have in relation to any pension/investment/mortgage/finance product or insurance policy you may be party to or take out, or to inform you of any developments in relation to those products and/or policies of which we might become aware.

### Processing when performing a task carried out in the public interest

We will use the information provided to protect members of the public against dishonesty, money laundering or fraudulent activities. This must necessarily be carried out without your explicit consent to ensure this function is not prejudiced.

Part of this processing involves verifying your identity using third party electronic verification.

### What information is required?

We only collect information that is necessary to carry out the purposes listed above. This includes information you supply and data we receive from reference agencies. Where practical and lawful we will inform you about any personal data we receive about you from third parties that you may be unaware of.

### Sharing Your Personal Data

From time to time Your Personal Data will be shared with:

- Appropriate staff such as those who carry out financial or compliance functions;-
- Organisations that need your information because we are required to provide it by law (e.g. The FCA, ombudsman services, HMRC etc);-
- Sometimes other authorised firms with specialist advisers, such as pension specialists, who assist us in providing suitable financial advice and services. You will be provided with their details if this applies;-
- Organisations and individuals contracted by us to carry out specific administrative, financial, compliance or direct marketing functions. These contractors will only process your information under our instructions and operate under the same obligations for data protection as we ourselves operate;-
- Law enforcement agencies, courts or other public authorities if we have to, or are authorised to by law;-
- Product providers we use to provide financial services in connection with our contract with AECOM; and-
- Where you give clear consent for us to share your information with a third party you name.

In each case, Your Personal Data will only be shared for the purposes set out in this customer privacy notice.

Please note that this sharing of Your Personal Data does not entitle such third parties to send you marketing or promotional messages: it is shared to ensure we can adequately fulfil our responsibilities to you and AECOM, and as otherwise set out in this Customer Privacy Notice.

We do not envisage that the performance by us of our service will involve Your Personal Data being transferred outside of the European Economic Area.

### What makes the processing lawful?

Because the processing is necessary:

- For the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract;
- For compliance with a legal obligation to which we are subject;
- For the performance of a task carried out in the public interest; and-
- For the purposes of the legitimate interests pursued by us.

### What are the consequences if you do not provide your personal information?

Your Personal Data is provided to enable us to advise your employer as part of our contract with them or, when applicable, to answer any queries you may have, or take steps at your request prior to entering into a contract, or to perform a contract to which you are a party. Without this information we will not be able to provide these services.

### Security and retention of Your Personal Data

Your privacy is important to us and we will keep Your Personal Data secure in accordance with our legal responsibilities. We will take reasonable steps to safeguard Your Personal Data against it being accessed unlawfully or maliciously by a third party.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected email, ensuring email attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Your Personal Data will be retained by us either electronically or in paper form for no longer than it is necessary in light of the reasons for which it was first collected. The Financial Conduct Authority lays down rules relating to how long information should be

held for and we will keep your information to meet these requirements. The following factors will be used to determine how long Your Personal Data is kept by us: business requirements, legal requirements and regulatory requirements.

#### Keeping your information up to date

We will record your information exactly as provided by you or AECOM or by the pension provider, currently Scottish Widows. You may ask us to update it at any time and we will action your request promptly and where possible notify relevant third parties of any changes.

#### Your rights in relation to Your Personal Data

You can:

- Request copies of Your Personal Data that is under our control via a subject access request to our Data Protection Officer;
- Ask us to further explain how we collect and use Your Personal Data;
- Ask us to correct, delete or require us to restrict or stop using Your Personal Data (details as to the extent to which we can do this will be provided at the time of any such request);
- Object to processing which is carried out as part of our legitimate interests or in the performance of a task carried out in the public interest. We will no longer process your data unless we can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims;
- Ask us to send an electronic copy of Your Personal Data to you or another organisation should you wish;
- Change the basis of any consent you may have provided to enable us to market to you in the future (including withdrawing any consent in its entirety); and
- You have the right to lodge a complaint with the regulator (see below).

#### How to contact TISCO in relation to the use of Your Personal Data

If you have any questions or comments about this document, or wish to make contact in order to exercise any of your rights set out within it please contact:

Data Protection Officer: Mike Denton, TISCO Financial Planning Ltd, Morton House, 80a Victoria St, St Albans, AL1 3XH, 01727 734040, [mike.denton@tisco.co.uk](mailto:mike.denton@tisco.co.uk)

If we feel we have a legal right not to deal with your request, or to action, it in different way to how you have requested, we will inform you of this at the time.

You should also contact us as soon as possible on you becoming aware of any unauthorised disclosure of Your Personal Data, so that we may investigate and fulfil our own regulatory obligations.

If you have any concerns or complaints as to how we have handled Your Personal Data you may lodge a complaint with the UK's data protection regulator, the ICO, who can be contacted through their website at <https://ico.org.uk/global/contact-us/>, by telephone 0303 123 113 or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

#### Direct marketing

Whilst you are an employee of AECOM we may use the information provided now and in the future to carry out direct marketing activities related to our services to AECOM and where relevant to the above (e.g. pension and retirement options) as these are legitimate interests pursued by us. You have the right to object at any time to the use of Your Personal Data for this purpose and we will cease any marketing activity. Contact our Data Protection Officer to let them know about your preferences as to how you would like to or would not like to receive such communication.

We may also use Your Personal Data to contact you directly regarding products and services that we and/or your employer think may be of interest to you and by any means of communication that is suitable at the time, for example sending by email an invitation to a webinar.