

 Collegia

# Privacy Policy

Collegia Partners Limited

## Data Protection Laws

This Policy is intended to explain how Collegia Partners Limited collects, uses, stores and shares personal data in connection with its websites and services. It should be read alongside any service-specific privacy information, terms and conditions, cookie notices and other data protection information that we provide from time to time.

## Who are we?

This Privacy Policy (Policy) describes how Collegia Partners Limited ("Collegia", "we", "us" or "our") of Buxton Court, 3 West Way, Oxford, OX2 0JB uses any personal data and special category data related to our websites and services.

This Policy applies to members and former members of the Collegia Pension, employers, advisers, beneficiaries, website visitors and any other person who interacts with us through our websites, applications, products or services.

## Who is the Controller?

Collegia is registered with the Information Commissioner's Office under registration number ZA788773.

For the purposes of data protection law, Collegia is usually the Controller of personal information that it collects and uses in connection with its own websites and services. Collegia also acts as administrator and service provider for the Collegia Pension and may process personal information in that capacity.

The Trustee of the relevant pension arrangement may also be a Controller for personal information processed in connection with the pension scheme. Where another party is a Controller, that party will be responsible for explaining how it uses personal information.

## What is personal information?

Personal information is information that identifies you or can reasonably be used to identify you. It may include your name, contact details, date of birth, employment details, financial information, pension details, identifiers used by our systems, and information about how you use our websites and services.

Special category data is more sensitive personal information, such as health information. We only use special category data where we have a lawful basis and, where required, an additional legal condition to do so.

## What type of personal information about you we might hold?

The type of information we hold will depend on your relationship with us. It may include:

- Identity and contact information, such as your name, postal address, email address, telephone number, date of birth and National Insurance number.
- Employment and payroll information, such as your employer, payroll identifiers, salary, earnings, tax information, auto-enrolment status and pension contribution information.
- Employment and payroll information, such as your employer, payroll identifiers, salary, earnings, tax information, auto-enrolment status and pension contribution information.
- Financial information needed to administer services, such as bank account details, payment records and transaction references.
- Information about your use of our websites, applications and services, including log-in information, device and browser information, technical identifiers, pages visited, actions taken and communications preferences.
- Correspondence and support information, including messages, calls, documents, complaints and feedback that you send to us or that we send to you.
- Information required to comply with legal, regulatory, tax, accounting, audit, anti-fraud, security or contractual obligations.

## How we may use your information

We may use your information to:

- Provide, administer and improve the services you or your employer use.
- Calculate, process and pay pension benefits or contributions, where relevant.
- Carry out agreements and provide information, products or services that you request from us.
- Notify you about services, changes to services, access credentials and important service information.
- Carry out statistical analysis, financial modelling, product analysis and internal reporting.
- Maintain internal records and manage our relationship with you.
- Manage risk, prevent fraud, maintain security and protect our systems.
- Comply with legal, regulatory, tax, accounting, audit and reporting obligations.
- Respond to regulators, government bodies, courts, ombudsmen, law enforcement agencies or other competent authorities.
- Manage disputes, complaints, claims, investigations or legal proceedings.
- Support a sale, transfer, merger, reorganisation or similar corporate transaction involving our business or assets.
- Ensure that our websites and services are presented effectively, securely and compatibly across devices and browsers.
- Use subcontractors, suppliers and service providers to support our operations.
- Analyse and improve our products, services, communications and customer experience.
- Provide website resources, information and materials.
- Allow you to access and use Collegia and FreePayroll applications.
- Personalise website or application content where appropriate.
- Enable social sharing and related website functionality.
- Provide information about products or services you have requested or that may be of interest to you, subject to applicable law and your communication preferences.
- Track referral links and similar attribution where this is needed to understand how our services are used and marketed.

## What happens if you fail to provide personal data?

Where we need to collect personal data by law, under the terms of a contract, or in order to provide a service, and you fail to provide that data when requested, we may not be able to provide the relevant service or perform the relevant contract.

We will tell you where this is the case at the time.

## Marketing

### Members

We will only send direct marketing to members where we have a lawful basis to do so. Where required, we will ask for your express consent before sending marketing communications. You can withdraw your consent or unsubscribe at any time by using the unsubscribe link in our communications or by contacting us.

Withdrawing from marketing communications will not prevent us from sending service, legal, regulatory or administrative communications that we need to send in connection with the services you use.

## **Employers**

Where you are an employer customer or prospective employer customer, we may contact you about similar products and services using the soft opt-in rules where permitted by law. We will give you a clear opportunity to opt out in every marketing communication.

## **Marketing, analytics and attribution**

We use analytics, advertising and tag-management technologies, including Google Analytics, Google Ads and Google Tag Manager, to understand how visitors reach and use our websites and services, measure campaign performance, and improve our products and marketing.

This may include collecting or using information such as the page you landed on, referral source, campaign parameters, Google advertising click identifiers, timestamps, device or browser information, and limited product events such as account creation, email confirmation, onboarding completion or subscription activity.

Where required by law, we only use non-essential analytics, advertising or attribution cookies and similar technologies with your consent. You can manage or withdraw your cookie consent through our cookie banner or browser settings.

We may share this information with analytics, advertising and tag-management providers for measurement and attribution purposes. We do not send payroll, pension contribution, bank account, National Insurance number or other sensitive payroll or pension data to advertising platforms for marketing attribution.

## **How long do we keep your information for?**

We keep personal information only for as long as reasonably necessary for the purposes for which it was collected, including to satisfy legal, regulatory, tax, accounting, reporting, audit, dispute-resolution and pension-administration requirements.

Where information is needed to administer pension benefits, we may need to retain records for the lifetime of a member and any dependant or beneficiary and for a further period after benefits have ceased, because pension rights and regulatory obligations can continue for a long time.

Where we process marketing, analytics and attribution information, retention periods may be shorter and will depend on the relevant tool, consent setting, cookie duration, reporting need and legal requirement.

## **Who do we share your information with?**

We may share your personal information with the following categories of recipient where necessary and lawful:

- The administrator and service providers involved in operating our services. The administrator is currently Collegia Partners Limited, company number 1730266, with office address at Buxton Court, 3 West Way, Oxford, OX2 0JB.
- Professional advisers, including lawyers, auditors, accountants, consultants and other advisers.
- Insurers, annuity providers, investment managers, banks, payment providers, technology providers and other suppliers involved in providing or supporting our services.
- Your financial adviser or other adviser, where you have authorised this or where it is otherwise lawful.
- Authorised representatives, attorneys, beneficiaries, dependants or other people connected with you where relevant.
- Regulators, government bodies, law enforcement agencies, tax authorities, courts, ombudsmen, dispute-resolution bodies and other competent authorities.
- Third parties inside the Collegia platform where this is needed to deliver the relevant service or functionality.
- Analytics, advertising, conversion tracking and tag-management providers who help us measure website usage, campaign performance and marketing attribution.

- Any buyer, transferee, merger partner, investor or adviser involved in a potential or actual sale, transfer, merger, reorganisation or similar corporate transaction involving our business or assets.

Where a service provider processes personal information on our behalf, we require it to process the information only for specified purposes and to protect it appropriately. Some recipients may act as independent Controllers for the information they receive, in which case they are responsible for their own use of the information.

Where information is transferred from a former provider or to a replacement provider, we will do so where needed to provide or continue services and in accordance with applicable law.

## Where do we store your data?

We store and process personal information using systems and service providers that may be located in the United Kingdom, the European Economic Area or other countries. Where we transfer personal information internationally, we take steps designed to ensure that the transfer is lawful and that the information receives appropriate protection.

### Schrems II Privacy Shield statement

Following the Schrems II judgment and related changes to international data transfer rules, we assess international transfers and use appropriate safeguards where required, such as adequacy regulations, standard contractual clauses, transfer risk assessments or other lawful transfer mechanisms.

## Your rights in relation to your personal information

Depending on the circumstances and subject to legal conditions and exemptions, you may have the following rights in relation to your personal information:

1. **Access:** You may ask us for a copy of personal information that we hold about you.
2. **Correction:** You may ask us to correct personal information that is inaccurate or incomplete.
3. **Erasure:** You may ask us to delete personal information in certain circumstances.
4. **Restriction:** You may ask us to restrict our use of personal information in certain circumstances.
5. **Objection:** You may object to our use of personal information in certain circumstances, including direct marketing.
6. **Portability:** You may ask us to provide certain personal information in a structured, commonly used and machine-readable format.
7. **Withdraw consent:** Where we rely on consent, you may withdraw that consent at any time. This will not affect processing carried out before withdrawal.

To exercise your rights, please contact us using the details at the end of this Policy. We may need to verify your identity before responding. We will respond within the time required by law.

## Cookies

### Use of cookies

Our websites and services may use cookies and similar technologies to distinguish you from other users, operate the website, remember preferences, understand usage, measure performance and support marketing or attribution where permitted.

We may use the following types of cookies:

- Strictly necessary cookies. These are required for the operation of our websites and services, such as security, authentication and core functionality.
- Analytical or performance cookies. These help us understand how visitors use our websites and services so that we can measure and improve performance.

- Functionality cookies. These allow us to remember choices you make and provide enhanced or personalised features.
- Targeting, advertising or attribution cookies. These may record visits, pages, referral sources, campaign parameters and similar information so that we can measure advertising performance and make marketing more relevant.

Some cookies may be set by third parties that provide analytics, advertising, tag-management, embedded content, security or other services. We do not control third-party cookies directly. You can manage cookies through our cookie banner where available and through your browser settings.

## **Any complaints?**

If you are unhappy with how we use your personal information, please contact us first so that we can try to resolve the issue. You also have the right to complain to the Information Commissioner's Office or another relevant supervisory authority.

## **Changes to this Policy**

We may update this Policy from time to time. Any changes will be posted on our website and, where appropriate, notified to you. This Policy is current on 1 May 2026.

## **How to contact us**

If you have questions about this Policy or how we use your personal information, please contact our Data Protection Officer, Riccardo Gasparini, at [hello@collegia.co.uk](mailto:hello@collegia.co.uk).

## **Further information**

Further information about data protection rights and obligations is available from the Information Commissioner's Office at <https://ico.org.uk/>.