

Smart Pension Master Trust: Fact Sheet for Participating Employers

About the Smart Pension Master Trust (Trustee of SPMT)

What is the Smart Pension Master Trust?

SPMT is a pension scheme, authorised and regulated by The Pensions Regulator, that helps members save for their retirement.

Smart Pension Limited (SPL) is the scheme funder of SPMT and EC2 Master Limited is the trustee of SPMT (the “Trustee”).

Is SPMT registered with the Information Commissioner’s Office (ICO)?

Yes, both SPL and the Trustee are registered with the ICO. SPL’s ICO registration number is ZA070575 and provides Data Protection Officer (DPO) duties on behalf of SPMT. The Trustee’s ICO registration number is ZA135972.

How do we process your data?

Is a controller-to-controller agreement needed between a participating employer and SPMT?

SPMT and participating employers are independent data controllers and therefore controller-to-controller agreements between SPMT and participating employers are not needed.

What is the relationship between Smart Pension Ltd and the Trustee?

Smart Pension Ltd and the Trustee are joint data controllers in relation to data held in respect of members of SPMT. There is an intra-group sharing agreement between the various Smart Pension group companies (including the Trustee). As this agreement involves all of the Smart entities, this is not shared externally.

What is the position under the participation agreement?

Each participating employer joining SPMT enters into a participation agreement. By signing a participation agreement, each employer explicitly acknowledges and accepts our terms and conditions, which can be found on the Smart Pension website.

Does SPMT have a Privacy Policy?

The Trustee has a Privacy Policy which sets out its approach to collecting, using, processing and protecting personal data in the business to comply with its legal and regulatory obligations in

respect of data protection. It serves as a transparent communication tool to inform SPMT members about their privacy rights and the practices employed by the Trustee and Smart Pension regarding the handling of their personal data.

Where can I find your Privacy Policy?

A copy of the SPMT Privacy Policy can be found on our website [here](#).

Does SPMT have a data protection programme in place to implement effective privacy controls?

The Trustee has a Data Protection Policy which sets out how it and Smart Pension use tools and processes to embed privacy controls into new products, operations and processes that collect and use personal data, such as data protection impact assessments, maintaining records of processing activities, supplier due diligence, incident management, mandatory training and audit procedures.

Does SPMT have a response programme in place to respond to data protection breaches?

Smart Pension operates a data breach notification procedure on behalf of the Trustee which sets out breach reporting requirements to the ICO and our clients. The Smart Pension DPO has overall responsibility for ensuring clients impacted by a security incident resulting in data loss are notified within agreed timelines.

Does SPMT have a Data Retention Policy?

The Trustee has a Data Retention Policy for SPMT. The Data Retention Policy is not publicly available but is consistent with the Trustee's legal obligations.

Does SPMT complete privacy risk assessments on handling personal data?

Yes, Smart Pension uses data protection impact assessments (DPIAs) to help to identify and minimise the data protection risks of handling personal data, in order to negate risk and demonstrate GDPR compliance in respect of SPMT.

Who should I contact with any queries relating to data protection?

If you have any questions that are not addressed in this FAQ document, please contact privacy@smartpension.co.uk.

How does SPMT ensure continuity of service?

What arrangements does SPMT have for hosting your data?

SPMT uses top-tier cloud computing services giving it access to a large number of data centres resulting in excellent resilience and security.

Does SPMT back up data?

SPMT creates daily backups of your data allowing this to be recovered if necessary.

Does SPMT have a Business Continuity Policy and Plan?

SPMT has a Business Continuity Policy supported by enterprise wide Business Continuity Plans to ensure continued service in the event of a disruption.

Does SPMT carry out business continuity and disaster recovery testing?

SPMT tests its business continuity plans on a regular basis with full disaster recovery tests for the Keystone platform every six months. Results of the tests are reviewed with ongoing refinement and improvements to our disaster recovery arrangements.

Does SPMT have a plan for a pandemic response?

SPMT has plans in place for responding to a pandemic, incorporating lessons learned during the COVID-19 pandemic. All colleagues are enabled to work remotely ensuring that service is maintained in these circumstances.

How do we keep your data secure?

How does SPMT manage information security?

SPMT leverages its cloud platform, Keystone, which is certified for ISO 27001 for information security and successfully completed a SOC 2 Type II audit. This demonstrates that its security controls are both appropriately designed and operating effectively over time, forming a key component of SPMT's information security management program.

Our approach to information security follows the requirements set out in these standards. SPMT's compliance with the standard is independently audited on a regular basis. Our ISO report is not publicly available but a link to our certification can be found [here](#).

SPMT has a full suite of Information Security Policies and manages the risks associated with information security in line with its Risk Management Framework approved at board level.

Does SPMT have controls against distributed denial-of-service (DDoS) attacks?

SPMT leverages its cloud supplier together with latest generation security software to counter DDoS attacks and maintain service.

Does SPMT have controls against malware?

SPMT maintains a full suite of technical controls against malware, including firewalls and anti-virus software together with real-time monitoring and reporting of activity through a dedicated security operations centre.

Does SPMT have a Patching Policy?

SPMT has a Patching Policy and implements procedures to ensure that users deploy software updates to devices.

How does SPMT deal with cyber incidents?

SPMT has a dedicated Cyber Security Team who work with incident managers in our Engineering Teams to mitigate cyber incidents and attacks, through our security incident process. SPMT has an appropriate cyber security insurance policy.

Does SPMT encrypt data?

All data and databases are encrypted using our cloud supplier's standards. All data transmission by SPMT is encrypted.

How does SPMT manage user access?

SPMT's Access Control Policy governs access to the platform and is strictly limited to colleagues where access is required to perform their roles. This access is subject to regular review and independent audits.

How does SPMT manage compliance?

Does SPMT have an Anti Money Laundering Policy?

SPMT has a dedicated Anti Money Laundering Policy and implements appropriate risk-based controls to meet its statutory obligations to prevent money laundering.

Does SPMT comply with UK sanctions?

SPMT is fully compliant with UK sanctions.

Does SPMT have an Anti Modern Slavery Policy?

SPMT has a dedicated Anti Modern Slavery Policy and requires all third-party suppliers to be compliant with UK law in this area.

Does SPMT provide compliance training for its employees?

SPMT's Risk and Assurance Team oversees implementation of a comprehensive annual mandatory training programme covering information security and compliance.

Does SPMT have a Whistleblowing Policy?

SPMT has a dedicated Whistleblowing Policy and provides its employees with an independent confidential whistleblowing service.