

Privacy statement

About us

This privacy statement is provided on behalf of Lane Clark & Peacock Netherlands B.V. ("LCP"), Herculesplein 40, 3584 AA Utrecht. LCP is registered under Chamber of Commerce number 30237621

Scope of this privacy statement

This privacy statement applies where LCP processes personal data about clients, pension scheme members, suppliers and other third parties with whom we have business dealings in circumstances where a privacy notice specific to the circumstances has not already been issued.

Where we use "him", "his" and words of similar meaning in this document, both male and female form are meant.

The personal data that we collect

We collect personal data about individuals in the course of running our business and providing our services to our clients. We may collect personal data from a variety of sources for example:

- Our clients
- Prospective clients
- Suppliers and service providers
- Individual persons

The personal data provided will depend on the source of the information but may include an individual's:

- Name
- Contact details (telephone number, e-mail address, address)
- Age / date of birth
- Marital status
- Employer / function
- Salary
- Pension amounts

How do we use personal data that we collect?

We use personal data for the purpose for which it has been provided to us, ie for legitimate business purposes, including but not limited to providing and improving our services to our clients, marketing our services (in accordance with our website and marketing privacy policy, managing our relationships with clients, prospects and third parties, the receipt of services, and staff recruitment.

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Use in behalf of clients

In circumstances where we process personal data on behalf of clients (including pension scheme member data) we will carry out such processing only in accordance with our clients' instructions. In processing such personal data, we will usually act as the data processor and our client is usually the data controller. We will carry out those functions in accordance with the new General Data Protection Regulation (GDPR), as laid down in the "Algemene Verordening Gegevensbescherming" (AVG) in the Netherlands.

Advice

LCP advises pension funds, companies and works councils about various pension related matters, including, but not limited to, determining (the value of) an individual member's pension. In providing our advice, LCP uses member data, which may include the personal data listed above. In these circumstances, we usually are the data controller and we will process the data in accordance with the AVG.

Our legal basis for processing personal data

Often, our legal basis for processing personal data will be contractual, for example we need to process personal data to meet our obligations under the terms on which we are appointed to advise our clients. In some cases, we might consider that we have a legitimate interest to process an individual's personal data. In other cases we might ask for an individual's consent to process their personal data, for example we might seek consent to retain contact details for the purpose of providing individuals with information that we believe could be useful and relevant to them. In such cases, we will always provide the individual with a clear way of withdrawing consent.

Data retention period

We will retain an individual's personal data for so long as the purpose the data has been provided for still exists, unless a longer retention period is required or permitted by law.

How we manage personal data?

The processing of an individual's personal data will be done in accordance with the AVG and any other legislation which is relevant to data protection. Access to personal data will be limited to authorised individuals on a strictly need to know basis. We are committed to keeping data safe and secure and will ensure that appropriate technical and organisation measures are in place to protect it from unauthorised or unlawful processing.

Sharing personal data

To provide our services to clients and for legitimate business purposes we may share personal data:

- where we have permission to do so;
- to third party service providers e.g. website host, event organisers an individual has registered for;

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- in order to give individuals and/or clients the service they have requested e.g. to use specialist companies to provide additional services or advice;
- for regulatory or legal purposes or to protect the rights of LCP, our clients or other parties; and
- to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.

Rights of individuals

Where we are the data controller, individuals have the following rights in relation to their personal data:

- right of access – the right to request a copy of their personal data that we hold;
- right to rectification – the right to have their data corrected if it is inaccurate or incomplete;
- right to erasure – the right to have their data deleted or removed if it is no longer necessary for the purpose for which it was obtained;
- right to restrict processing – the right to request that the way in which we use their data is restricted to certain uses which they may specify.
- right to data portability – the right, where applicable, to have their data transferred to another organisation;
- right to object – the right to object to the processing of their personal data in certain circumstances e.g. for direct marketing purposes. In the event that an individual has not consented to our use of their personal data and we are not using their data in a way in which they would reasonably expect or they do not consider that we are using their data for their benefit, then an individual may object to us collecting and using their personal data. Individuals may withdraw any consent they have given in respect of their personal data at any time.

To exercise any of these rights please contact us using the contact details below. We will aim to respond to any request received within one month of receipt.

Complaints

We aim to meet the highest standards when collecting and using your personal information. However, if you believe we are not meeting these standards and wish to make a complaint, please contact our Privacy Officer. If you are not satisfied with our response you have the right to complain to the Dutch Data Protection Authority.

Changes to this privacy statement

We keep this privacy statement under regular review and place any updates on our website. This privacy statement was last updated on 25 May 2018.

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How to contact us?

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If you would like further information about this privacy statement or how to request your personal data you can email us at info@lcpnl.com or write to:

Lane Clark & Peacock Netherlands BV
T.a.v. de Privacy Officer
Herculesplein 40
3584 AA UTRECHT