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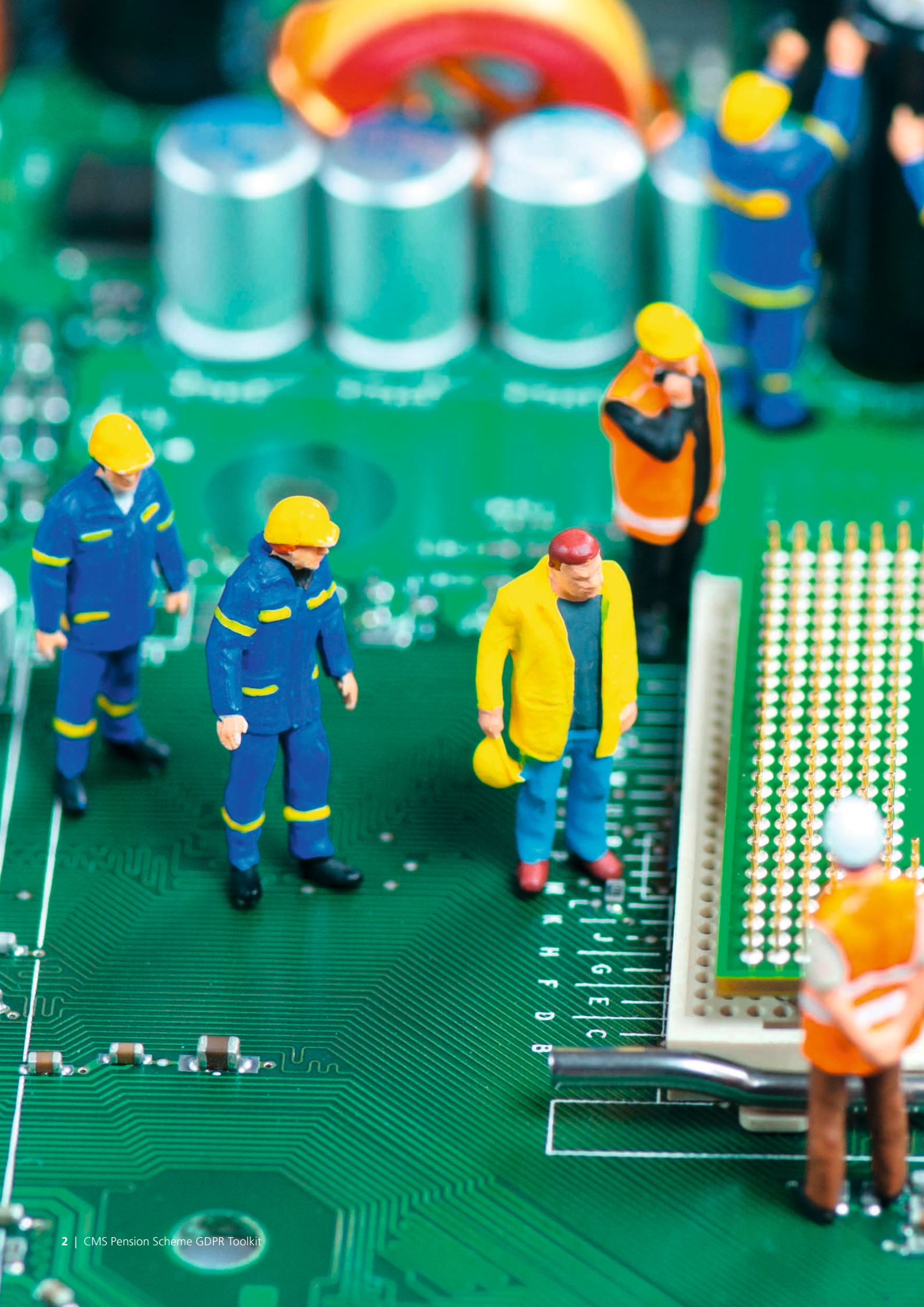
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CMS Pension Scheme GDPR Toolkit

Helping you to get ready for the General Data
Protection Regulation before 25 May 2018.



January 2018





CMS Pension Scheme GDPR Toolkit

Many trustees of smaller occupational pension schemes are now turning their thoughts to GDPR compliance and looking for a simple and cost-effective solution that they can implement with limited advisor involvement. The CMS Pension Scheme GDPR Toolkit has been specifically designed with those trustees in mind.

Is the Toolkit for me?

This Toolkit is designed for trustees who...



...are managing **small schemes** seeking to take a proportionate approach to the new requirements.



...manage **standard** occupational defined benefit (or hybrid) pension schemes.



...are seeking a simple and straightforward route to **compliance** with minimal advisor involvement.



The CMS Toolkit provides your 'off-the shelf' solution.

CMS Pension Scheme GDPR Toolkit

A lot of schemes are seeking the practical steps they need to take, and basic advice on how to take them.

These are the practical steps you are looking for:

Understanding the GDPR



Complete data mapping



Develop a record of processing activities



Take advice on “lawful processing” and Data Protection Officer (DPO) requirements



Update your communications and forms/processes



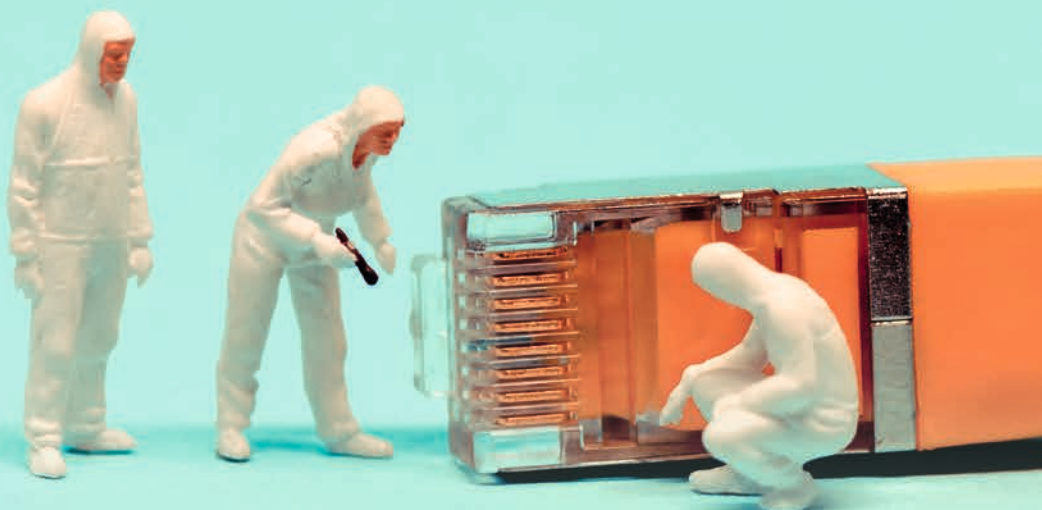
Revise supplier contracts



Develop your privacy notice



Establish a data breach policy



Practical steps

Our Toolkit will assist you in taking these practical steps in the following ways:



A briefing note and legal compliance timetable. We will support you to **understand the GDPR** by providing a one hour call, included in the Toolkit price, to explain the principles underlying the GDPR and the product we are providing.



Data mapping does not require legal advice. We will, however, provide you with an example e-mail to send to third parties and a “mind map” of typical data flows to help you understand and complete your data mapping.



We will also provide you with a **template to record your data mapping**, that will set you up to comply with your obligation to keep a record of the scheme’s processing activities.



We will provide you with **generic legal advice** that covers the lawful bases you are likely to be using in your day-to-day running of the scheme. This will also cover the need for a Data Protection Officer. The GDPR requires you to demonstrate your accountability, so you need to evidence consideration of your fair processing obligations.



Updating your communications and forms should primarily be a job for your scheme administrator and any pensions manager. Once you understand the principles of GDPR, you may be comfortable that this does not require legal sign-off. It will be important that you satisfy yourself that your administrators, and other suppliers, are taking the necessary steps to become GDPR compliant.



This Toolkit assumes you will rely on your **third party suppliers to suggest amendments to their existing contracts** in order to comply with the GDPR. You may be satisfied with their approach and decide you don’t require further legal input. We are always happy to help further if you need a review of those proposed clauses, or if you feel that negotiation is required (this would be priced separately to the Toolkit).



We will provide you with a **GDPR-compliant privacy policy**. Your role will be to consider the specific circumstances of the scheme, and modify as necessary. You should also diarise to review it periodically.



Finally, we will also provide a **GDPR-compliant data breach policy**. You will need to ensure it works for your scheme, and of course implement the processes within it.





CMS Pension Scheme GDPR Toolkit

The CMS Pension Scheme GDPR Toolkit is an off-the-shelf kit. We will provide you with the basic tools you need for a flat fee. Aside from the initial one hour phone call, any further legal support will be in addition. We are, of course, always happy to provide estimates and fixed fees for our work if this is required.

The CMS pensions team has been at the forefront of the GDPR through the whole of its development. Our technical specialists were involved at the policy stages, and our pensions specialists have fed into government consultations and industry groups liaising with the Information Commissioner's Office to help shape the final form of the GDPR and guidance. **You can be confident that the CMS Pension Scheme GDPR Toolkit has been developed by market leaders in the field, with the best insights in the industry.**



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