



Institute  
and Faculty  
of Actuaries

# Personal Data Processing Policy

**Authorised by:** Anne Moore, Chief Operating Officer

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Date	New version	Author	Description	Details
May 2018	v1	David Hood	Policy issued	New policy

# Personal Data Processing Policy

## 1. Introduction

As part of complying with our obligations under the General Data Protection Regulation (GDPR), we must be able to explicitly state:

- the lawful basis for processing personal data and the purpose(s) each lawful basis relates to; and
- when we will seek consent to process personal data.

## 2. Purpose

The purpose of this policy is to state the lawful basis for processing personal data and when we will seek consent.

## 3. Scope

This Policy applies to any processing of personal data without constraint or exception.

## 4. Policy Statements

We will only process personal data without consent from the individual(s) under the following lawful bases and as defined in Table 1:

- under contract – i.e. when entering into a contract with the individual(s);
- under legal obligation – i.e. to comply with UK or EU law;
- where we are pursuing our legitimate interests and these are not overridden by the interests, rights or freedoms of the individual;
- in the vital interest – i.e. if it is necessary to protect someone's life;
- as a public task – i.e. to fulfil an official function or task in the public interest.

We will only process personal information with consent from individual(s) that is:

- unbundled: consent requests will be separate from other terms and conditions and consent will not be a precondition of signing up to a service unless necessary for that service;
- actively opted in to: pre-ticked boxes will not be used;
- granular: we will seek to obtain separate consent for each activity and not rely on 'blanket' consent;
- informed: we will name third parties with whom we share personal data wherever possible;
- documented: records will be kept to demonstrate what individual(s) have consented to, what they were told, and when/how they consented;
- easy to withdraw: individuals will be informed of the right to withdraw their consent at any

time, and how to do this. We will have simple and effective withdrawal mechanisms in place.

### 5. Lawful basis for processing and consent

The following table outlines examples of activity the IFoA undertakes (and the purpose for processing) and defines the lawful basis of processing and where consent is required.

IFoA activity / purpose(s) for processing	Lawful basis for processing					
	Contract	Legal Obligation	Vital Interest	Public Task	Legitimate Interest	Explicit consent required
Events: Booking	•					
Managing staff: Recruiting, training, leave/absence, health/medical, conduct, performance, leaving	•	•				•
Conducting any survey related to engaging/managing staff	•					
Managing finances: paying / receiving monies	•	•				
Paying pension	•	•				
Managing facilities: access control	•	•	•			
Managing facilities: health and safety		•	•			
Managing firms				•		
Communicating with the government, regulators, and other competent authorities, members, volunteers, and the public				•	•	
Managing members: reviewing/approving membership applications, educating, regulating, investigating, disciplining, and maintaining the Register of Members	•	•		•	•	
Managing members and non-members: undertaking paid work for the IFoA	•			•		
Managing members and non-members: undertaking unpaid work for the IFoA				•		
Promoting Continuous Professional Development opportunities, IFoA events or services, or external events or services with a research, public policy or public interest theme				•	•	
Conducting any survey not related to engaging/managing staff where personal data is captured/processed						•
Conducting research with data that contains personal or special category personal data						•

### 6. Special categories of data

We will be required to process special categories of data in the following scenarios:

- Staff may be required to provide health/medical information in relation to sick leave and work arrangements. Consent will be sought in relation to occupational health assessments and sharing the assessment findings with us.
- Members may be required to provide health/medical information in relation to applications for mitigating circumstances to be taken into consideration when marking exams.

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## 7. Criminal background checks

We:

- will ask for members to confirm if they have any unspent criminal convictions when applying for membership; and
- may receive and process information about criminal offences committed by members and/or any related proceedings if we are made aware and as part of our disciplinary process.

## 8. Use of CCTV

We/our landlords:

- have CCTV installed around the entry/exit points of our offices to:
  - deter crime;
  - assist in the prevention and detection of crime;
  - assist with the identification, apprehension and prosecution of offenders;
  - monitor the security of the premises and assets held on the premises; and
  - support investigations into staff disciplinary matters.
- have clear signage in place so that people are aware they are entering an area covered by CCTV and who to contact regarding the CCTV;
- retain CCTV footage/images and any recording logs; and
- securely destroy all footage/images and recording logs after 31 days.

## 9. Review and approval

This policy and all related policies and procedures will be:

- reviewed by the Data Protection Officer on an annual basis; and
- approved by the Chief Executive Officer whenever a material change has been made in order to comply with our Governance Manual.