



NEST Scheme – Data Protection

In May 2018 the General Data Protection Regulation and the Data Protection Act 2018 came into force. This FAQ has been put together to help members, employers, connectors and independent financial advisors answer questions they may have.

This document supplements the [Privacy Policy](#) and Privacy Information Notices as published on the NEST website and should be read together.

Controller	National Employment Savings Trust (NEST) Corporation
Contact address	Nene Hall, Lynch Wood, Peterborough, PE2 6FY
Privacy Policy	nestpensions.org.uk/privacypolicy
This document was updated	10/12/2018

Questions	Answers
Is NEST a processor for participating employers using the NEST scheme?	<p>NEST Corporation has a legal obligation (under the NEST Order and Rules) to administer the NEST scheme and is processing the personal data of its members, participating employers and intermediaries for that purpose.</p> <p>NEST Corporation doesn't act as a processor in respect of the above activities. NEST decides what personal data to collect, why and how to use it, in order to be able to provide and operate the pension arrangements of the NEST Scheme.</p> <p>In summary, participating employers don't choose what personal data they're willing to share with NEST Corporation in setting up and dealing with employee pension arrangements and don't control how NEST Corporation provides and operates the pension arrangements.</p>
Does NEST have a plan to ensure data protection compliance?	Only the Information Commissioner's Office can determine whether an organisation is compliant, however NEST has implemented a programme of compliance.
Does NEST have specific policies for the creation, storage and retention of personal data?	NEST has robust Information Security and Data Protection policies for processing personal data as further explained in our privacy policy on the NEST website.
Does NEST have a dedicated team to implement and manage its data protection programme?	NEST has a team whose responsibilities include implementation & management of its data protection programme.
Does NEST have a retention policy for disposal of data?	The process and timeline for data retention will vary depending on the type of data and is set out in the relevant Privacy Information Notice which can be found in our Privacy Policy .
Does NEST have training in place on data protection?	NEST has robust training in place to ensure its staff are aware of data protection requirements and is refreshed on a regular basis. In order to ensure its effectiveness, the training encompasses a test.
How does NEST ensure data protection for data transmitted overseas?	NEST may use a variety of safeguards to protect personal data when transmitting data overseas, depending on the case. More details can be found in the relevant Privacy Information Notice accessible from our Privacy Policy .
Does NEST have a breach procedure in place?	NEST's procedures have been updated to take into account data protection requirements. In addition, NEST undertakes random testing of its procedures.

How can members, employers and their advisers get access to their data? Instructions on how to exercise the new rights for individuals are explained in the relevant Privacy Information Notices which are accessible from our [Privacy Policy](#).

Do employers need permission from workers for the employer to send enrolment data and contribution data to NEST? It's for the employers/advisers to seek relevant independent advice depending on their individual situation, NEST cannot advise on this.

Storage & Processing

Where does NEST store personal data? Data is mainly stored at two Data Centres both located in the UK. However, NEST makes use of cloud based services in certain circumstances (e.g. Email), that will store data within the EEA.

Where is NEST personal data processed? Data is accessed from the UK as well as outside of the UK, as further explained in the relevant Privacy Information Notice accessible from our Privacy Policy.

Does NEST use processors and if so, what security measures are in place? NEST uses processors as part of the administration of the scheme. More information on this can be found in the relevant Privacy Information Notice accessible from our Privacy Policy.

Information security

What organisational and technical controls does NEST have in place? An Information Security Management System (ISMS) is maintained for the NEST scheme. The ISMS is regularly audited and certified to ISO:27001:2013.

The ISMS implements an organisational and technical controls framework, including controls within the following areas:

- information security policies
- organisation of information security
- human resource security (inc. confidentiality arrangements)
- asset management
- access control
- cryptography (encryption)
- physical and environmental security
- operations security (inc. antivirus and malware, vulnerability management)
- communications security (inc. network controls)
- system acquisition, development and maintenance (inc. penetration and security testing)
- supplier service delivery management
- information security incident management
- information security aspects of business continuity management
- compliance.