

Record of Processing Activities - Article 30

Who processes the data?	Processor or Controller?	What personal data do they hold?	Why are they using the data? (legal basis - Article 6 c of the GDPR - processing is necessary for compliance with a legal obligation on the controller)	Who are the data subjects?	Where is data held?	Will the data be shared with any third parties by the Processor/Controller?	Is data transferred outside EEA?	How long is the data kept?	How is the data secured?
Administering authority / administrator (NCC/CCC)	Controller	Member data, potential beneficiary's data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To administer the scheme	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Pensions administration system, microfiche, scanned documents, secure archive storage, SharePoint, local network drives.	Yes - see Information Asset Register and as explained below.	No. Unless members reside in a country outside the EEA in which case the Fund will communicate personal data to them normally via letter, email, payslip and P60.	99+ years	TBC
Employing Authorities	Controller in common	Member data (see Information Asset Register)	To facilitate employment decisions (ill health, redundancy estimates) as requested by the employer, to make additional pension contribution deductions from the employee's pay.	The employing authority's employees (scheme members)	N/A - specific to each scheme employer.	N/A	N/A	As determined by the employer.	As determined by the employer.
Auditor	Processor	Member data, potential beneficiary's data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To audit the Fund's Annual Report and Statement of Accounts and to ensure appropriate internal controls are in place	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	SharePoint	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Actuary	Joint Controller	Member data, potential beneficiary's data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To calculate the value of the Fund's assets and liabilities based on its membership profile and to set employer contribution rates.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Secure portal.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Legal Advisor	Processor	Member data, potential beneficiary's data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	Provision of legal advice with regards to dispute resolution and TUPE transfers/employer admissions.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	N/A - specific to service provider.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Pensioner Payroll Provider (LGSS Payroll) (NCC/CCC - same Data Controller)	Processor	Member data - pensioner and dependants' data only (see Information Asset Register)	To process pension payments, make statutory deductions, issuing P60s.	Pensioner and dependant scheme members.	Pensions administration system, local network drives.	No.	No.	6 + current tax year on local network drives, 99+ years on Pension Administration System	TBC
AVC Provider	Processor	Member data (see Information Asset Register)	Creation and maintenance of an individual member's AVC account.	Scheme members.	N/A - specific to service provider.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Printers	Processor	Member data (see Information Asset Register)	To print pensioner payslips, P60s and bulk member communications.	Scheme members, representatives of scheme members, optants out.	N/A - specific to service provider.	NCC/CCC corporate contract used for print services. Please refer to NCC/CCC's ROPA.	No.	To be confirmed but no longer than the end of the contract.	NCC/CCC corporate contract used for print services. Please refer to NCC/CCC's ROPA.
Software Provider	Processor	Member data, potential beneficiary's data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To provide software management support in the delivery of the Fund's pensions administration, pensioner payroll, member and employer self-service functions.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Secure servers.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Overseas Payments Transmitter	Processor	Member data - pensioner and dependants' data only (see Information Asset Register)	To transmit net pension payments to overseas bank accounts.	Pensioner and dependant scheme members.	N/A - specific to service provider.	No.	Yes - where a member has an overseas bank account outside the EEA.	To be confirmed but no longer than the end of the contract.	TBC
Benefits Consultant	Processor	Member data, potential beneficiary's data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To support the Fund in delivering ad hoc and specific pensions administration activities.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	N/A - specific to service provider.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC
Independent Data Auditor	Processor	Member data, potential beneficiary's data, members' representative data, optants out data, previous scheme members with no remaining liability (see Information Asset Register)	To provide independent insurance on the quality and accuracy of the Fund's data.	Scheme members, potential beneficiaries, representatives of scheme members, optants out, previous scheme members with no remaining liability.	Secure portal.	No.	No.	To be confirmed but no longer than the end of the contract.	TBC

Data Controller:	Cambridgeshire County Council	Shire Hall, Cambridge, CB3 0AP	Data Protection Officer: TBC
Joint Data Controller:	Hymans Robertson LLP (Fund Actuary)	Exchange Place One, Semple Street, Edinburgh, EH3 8BL	
Joint Data Controller:	Aon Hewitt	Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH	