

Scope (services)	Service provider	Role	Party type	Main contractor	Services provided by the processor	Location of processing	Restricted transfer mechanism	Transfer Risk Assessment completed	External note
Core IT services	Microsoft, Inc. and affiliates	Processor	Third party		Azure cloud services and Office 365	UK;#EEA;#Outside EEA	EU SCCs + UK IDTA;#UK Extension to the EU-U.S. Data Privacy Framework	Yes - by Hymans Robertson	Data is hosted in the EEA. Microsoft shared services use compute power across their data centres globally but processing is temporary and data does not persist in memory once the processing is complete. In exceptional circumstances, support may be provided from outside the EEA. See https://www.microsoft.com/en-gb/trust-center/privacy/data-access#subcontractors for a list of sub-processors used by Microsoft.
Core IT services	Softcat PLC	Processor	Third party		Reseller for cloud data backup provider Commvault	UK	Not applicable	Not applicable	
Core IT services	Commvault Systems Limited	Processor	Fourth + party	Softcat PLC	Cloud data backup provider	UK	Not applicable	Not applicable	
Core IT services	Twilio Inc.	Processor	Third party		Identity authentication and related services	UK;#EEA;#Outside EEA	UK IDTA	Yes - by the processor	See https://www.twilio.com/legal/sub-processors for a list of sub-processors used by Twilio
Core IT services	Whitespace (Scotland) Limited	Processor	Third party		Website hosting	UK	Not applicable	Not applicable	
Design and printing services	Cubiquity Limited	Processor	Third party		Design, printing and mailing services	UK	Not applicable	Not applicable	
Design and printing services	Like Minds (UK) Limited	Processor	Third party		Production and distribution of member statements and other communications	UK	Not applicable	Not applicable	You may have a direct relationship with Like Minds. Please check.
Design and printing services	DotDigital Group PLC	Processor	Fourth + party	Like Minds (UK) Limited	Digital Marketing Email Service Provider	UK	Not applicable	Not applicable	
Design and printing services	Egnyte, Inc.	Processor	Fourth + party	Like Minds (UK) Limited	Secure file hosting	UK	Not applicable	Not applicable	
Design and printing services	Network Support (London) Ltd (trading as VTSG)	Processor	Fourth + party	Like Minds (UK) Limited	IT support	UK	Not applicable	Not applicable	
Design and printing services	Optichrome Limited	Processor	Fourth + party	Like Minds (UK) Limited	Print/Programming & mailing	UK	Not applicable	Not applicable	
Design and printing services	Shere Associates Limited	Processor	Fourth + party	Like Minds (UK) Limited	Programming and printing of individualised statements	UK	Not applicable	Not applicable	
Design and printing services	Strait Logics Limited	Processor	Fourth + party	Like Minds (UK) Limited	Programming	UK	Not applicable	Not applicable	
Design and printing services	VideoSmart Ltd	Processor	Third party	Like Minds (UK) Limited	Production of video content for specific projects	UK	Not applicable	Not applicable	
Design and printing services	Paragon Customer Communications (London) Ltd	Processor	Third party		Printing and mailing services	UK	Not applicable	Not applicable	
Design and printing services	Atos IT Services UK Limited	Processor	Fourth + party	Paragon Customer Communications (London) Ltd	Technology operations	UK	Not applicable	Not applicable	
Pension scheme administration and processing	Bottomline Technologies Ltd	Processor	Third party		BACS processing	UK	Not applicable	Not applicable	
Pension scheme administration and processing	Cashfac PLC	Processor	Third party		Digital cash accounts and banking platform for the automation of payments, receipts, cashbook accounting and reconciliation	UK;#Outside EEA	UK IDTA	Yes - by the processor	Cashfac is being deployed in our pensions administration business unit from spring 2024
Pension scheme administration and processing	Cashfac Pty Limited	Processor	Fourth + party	Cashfac PLC	Start of day monitoring process	Outside EEA	UK IDTA	Yes - by the processor	
Pension scheme administration and processing	Civica UK Limited	Processor	Third party		Support for the UPM administration system	UK	Not applicable	Not applicable	
Pension scheme administration and processing	Convera UK Financial Limited	Processor	Third party		Payment to pensioners' overseas bank accounts	UK;#EEA;#Outside EEA	Not applicable	Not applicable	We will only transfer data outside the UK if instructed to do so by the pensioner for overseas payments
Pension scheme administration and processing	Crowe U.K. LLP	Processor	Third party		IDV referrals for overseas cases	UK	Not applicable	Not applicable	
Pension scheme administration and processing	Experian Limited	Processor	Third party		Tracing services and address verification	UK;#EEA	UK adequacy regulations	Not applicable	We may use one or more of these tracing service providers.
Pension scheme administration and processing	GBG Group PLC	Controller	Third party		Biometric identity verification provider	UK;#Outside EEA	Not applicable	Not applicable	GBG will be deployed from summer 2024
Pension scheme administration and processing	IDscan Research Bilsim Teknolojileri Sanayi Ticaret Limited Sirketi	Processor	Fourth + party	GBG Group PLC	Support services for IDScan	Outside EEA	Not applicable	Not applicable	
Pension scheme administration and processing	Hughes & Co Design Limited	Processor	Third party		Design and printing services	UK	Not applicable	Not applicable	
Pension scheme administration and processing	Precision Marketing Group Limited	Processor	Fourth + party	Hughes & Co Design Limited	Design and printing services	UK	Not applicable	Not applicable	
Pension scheme administration and processing	ID-Pal Limited	Processor	Third party		Biometric ID verification for overseas cases	UK;#EEA	UK adequacy regulations	Not applicable	Service provided to certain clients by agreement. Please contact us for a list of ID-Pal's subprocessors if you require it.
Pension scheme administration and processing	LexisNexis Risk Solutions UK Limited	Processor	Third party		Tracing and identity verification services	UK;#EEA;#Outside EEA	UK adequacy regulations;#EU SCCs + UK IDTA	Yes - by the processor	We may use one or more tracing service providers. See https://risk.lexisnexis.com/group/dpa/sub-processors for a list of sub-processors used by LexisNexis.
Pension scheme administration and processing	Profund Solutions Limited	Processor	Third party		Support for Aviaary accounting software	UK	Not applicable	Not applicable	
Pension scheme administration and processing	Purify	Processor	Third party		Call recording platform	UK	Not applicable	Not applicable	
Pension scheme administration and processing	Purify Technology Ltd	Processor	Third party		Call recording platform	UK;#EEA	UK adequacy regulations	Not applicable	
Pension scheme administration and processing	Workstream People BV	Processor	Fourth + party	Purify Technology Ltd	Call recording platform	UK;#EEA	UK adequacy regulations	Not applicable	
Pension scheme administration and processing	RSM UK Risk Assurance Services LLP	Processor	Third party		Auditing of internal controls	UK	Not applicable	Not applicable	
Pension scheme administration and processing	SendinBlue SAS, trading as Brevo	Processor	Third party		Bulk email service	UK;#EEA	UK adequacy regulations	Not applicable	Please see https://www.brevo.com/legal/terms-of-use/#annex for a list of subprocessors used by Brevo
Pension scheme administration and processing	Target Professional Services (UK) Limited	Processor	Third party		Tracing services	UK	Not applicable	Not applicable	We may use one or more of these tracing service providers.
Pension scheme administration and processing	Mail Metrics Business Services UK Limited	Processor	Third party	Target Professional Services (UK)	Outsourced mail services	UK	Not applicable	Not applicable	
Records management services	Restore plc	Processor	Third party		Offsite secure storage of paper files	UK	Not applicable	Not applicable	
Records management services	Shred-it Limited	Processor	Third party		Confidential shredding services	UK	Not applicable	Not applicable	