

| 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 |
|--|---|------------|----------------|--|---|------------------------|--|------------------------------------|--|
| | | | | | | | EU SCCs + UK IDTA;#UK Extension to the EU-U.S. | | 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 | Microsoft, Inc. and affiliates | Processor | Third party | | Azure cloud services and Office 365 | UK;#EEA;#Outside EEA | Data Privacy Framework | Yes - by Hymans Robertson | |
| 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 | Appoly Ltd | Processor | Fourth + party | Like Minds (UK) Limited | Website development and hosting | UK | Not applicable | Not applicable | |
| 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 | Graphic Arts (Coventry) Ltd | Processor | Fourth + party | Like Minds (UK) Limited | Printing services | 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 | 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 | West Midlands Media Ltd | Processor | Fourth + party | Like Minds (UK) Limited | Website development | 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 <i>Aviary</i> accounting software | 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/termsfuse/#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) Limited | 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 | |