



Data protection & cybersecurity

PENSIONS DASHBOARDS PROGRAMME (PDP) - DATA PROTECTION ADVICE

+ PDP COMPLIANCE

The **Pensions Dashboards Programme (PDP)** requires schemes to share data in new and innovative ways, enabling individuals to access their pensions information online, securely and all in one place.

All in-scope pension providers and schemes must connect to the Pensions Dashboards ecosystem by **31 October 2026**.

+ HELPING YOU RISE TO DATA SHARING CHALLENGES

When connecting to the PDP, Trustees must protect member interests by addressing **data protection and cyber security risks** and comply with relevant data protection obligations.

You may not have reviewed the data protection provisions in your contracts since the GDPR came into force in 2018. **Now is the time to review your policies, procedures and data security standards.**

Ensure that they are robust and compliant before the connection deadline of 31 October 2026.

YOUR NEW OBLIGATIONS

+ CONDUCTING DATA PROTECTION IMPACT ASSESSMENTS

You must complete or update a Data Protection Impact Assessment, helping you identify, assess and manage risks with your PDP connection. Impact Assessments are essential tools that can be used in other projects, for example before transferring personal data to an insurer, to ensure that your methods are effective, secure and compliant.

+ IMPLEMENTING COMPLIANT POLICIES

You will have to create a practical internal PDP policy, outlining your scheme's obligations in relation to data sharing and data protection compliance under the PDP framework. You must engage and educate members on cyber risks and potential pension scams connected with PDPs.

+ REVIEWING AND NEGOTIATING ADMINISTRATOR CONTRACT AND DATA PROCESSING AGREEMENT (DPA)

You will need to review your administrator agreements to ensure that data protection terms reflect your new obligations and provide appropriate legal safeguards. You should also consider data protection when engaging a specific Integrated Service Provider (ISP).

+ UPDATING PRIVACY NOTICE

You must update your privacy notice to explain how member data will be used in connection with the PDP, including sharing of data with dashboard providers and administrators/ISPs. Set out how you will ensure that it complies with data protection law and the principles of fair, lawful and transparent data processing.



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NEW DATA COMPLAINT HANDLING OBLIGATIONS - WHAT DO YOU NEED TO DO?

+ LEGAL DEVELOPMENTS

All organisations (including pension scheme trustees) have to **implement a formal data protection complaints process by 19 June 2026**, under new obligations introduced by the Data (Use and Access Act) 2025

If an individual considers that an organisation has infringed data protection legislation in its handling of their personal data (or the personal information of someone they're acting on behalf of), they must be able to make a complaint directly to that organisation, before it is escalated to the Information Commissioner's Office (ICO).

+ HELPING YOU NAVIGATE DATA PROTECTION COMPLAINTS

We are here to support our clients in implementing a compliant internal complaints-handling process that supports:

- a **clear mechanism** for submitting complaints,
- **acknowledge receipt within 30-days** and
- a formal response "**without undue delay**".

YOUR NEW OBLIGATIONS

+ ESTABLISHING A COMPLAINTS PROCESS

You must establish or update your complaints processes to be clear and accessible and ensure appropriate integration with existing complaints and data subject rights processes.

+ UPDATING POLICIES

You should implement, or update, your written complaints-handling policies, ensuring the trustees' approach to receiving, handling and resolving data protection complaints is compliant.

+ UPDATING PRIVACY NOTICE

You will need to update your privacy notice to inform data subjects about their right to complain and how to submit a complaint. Your privacy notice must comply with the new legal requirements and ICO guidelines.

+ OPERATING THE COMPLAINTS PROCESS IN PRACTICE

You must manage the complaints process or engage the support of your administrator to handle this obligation on your behalf. You must consider:

- how to record and track complaints;
- devise potential remedies and mitigations to minimise the impact of complaints;
- how to communicate decisions and remedial actions clearly.

YOUR DATA PROTECTION KEY CONTACTS



KATIE HEWSON

Head of Data Protection
+44 20 7809 2374
katie.hewson
@stephensonharwood.com



SARAH O'BRIEN

Managing Associate
+44 20 7809 2481
sarah.obrien
@stephensonharwood.com



KATIE-CLAIRE LLOYD

Associate
+44 20 7809 2018
katie.claire-lloyd
@stephensonharwood.com

YOUR PENSIONS KEY CONTACTS



STEPHEN RICHARDS

Partner
+44 20 7809 2350
stephen.richards
@stephensonharwood.com



PHILIP GOODCHILD

Partner
+44 20 7809 2166
philip.goodchild
@stephensonharwood.com



ESTELLA BOGIRA

Partner
+44 20 7809 2298
estella.bogira
@stephensonharwood.com

+ A LEADING PRACTICE

The data protection team is consistently recognised by clients and legal directories for its high-quality work and its practical and pragmatic approach. The team advises clients on all aspects of data protection law, including advisory, transactional, contentious, and investigations-related privacy matters.

'The team's practical, actionable advice makes them unique – they combine deep technical knowledge with business savvy in a way that provides unmatched value to their clients.'

Legal 500 UK 2026

PICCASO Privacy Awards
2025 – awarded
'Law Firm of the Year'.



Lexology Index 2026 – awarded
'Client Choice award for Data in England'.

Recognised in the Lexology
100: Data 2026 (Formerly the
GDR 100).



Tier 3 Chambers UK 2026:
Pensions



Leading firm in Legal 500
UK 2026 for Pensions

