

# SAMWORTH BROTHERS LIMITED SUPERANNUATION SCHEME

## DATA PROTECTION NOTICE

### Who are we?

We are the Trustees of the Samworth Brothers Limited Superannuation Scheme (the **Trustees, we or us**). We collect, hold and use personal information to help us run the Samworth Brothers Limited Superannuation Scheme (the **Scheme**).

### Why are we writing to you?

The Trustees are data controllers in respect of the personal information that we hold in relation to the Scheme. Because we use your personal information, under the Data Protection Legislation we have to provide you with certain information.

This notice contains information on:

- the personal information we collect about you, what we do with this information and why we hold it. This is explained in more detail in section one (see page 2).
- who else we get personal information from and who else we share personal information with. This is explained in more detail in section two (see page 5).
- what rights you have in relation to your personal information and who to contact if you have any problems. This is set out in section three (see page 6).

We have set out additional information on how and why we process your personal information (see page 9), your rights under the UK GDPR (see page 12), third parties with whom we share your personal information (see page 16) and an explanation of the key terms and phrases that are used in this notice (see page 18).

### Where can I get more information?

This notice is at: [Scheme information - Samworth Brothers Limited Superannuation Scheme](#). We also provide printed versions (including large print versions) on request.



**We may change this notice from time to time.** Please visit this webpage [Scheme information - Samworth Brothers Limited Superannuation Scheme](#) or contact us in order to receive the most up to date version of this notice. Our contact details are set out in section three of this notice (see page 16).



**It is important that you read this notice (and any other privacy information that we send to you) so that you are aware of how and why we are using your personal information.**

# SECTION ONE

## ABOUT YOUR PERSONAL INFORMATION

### What information do we collect and process?

We collect and process your personal information because you are or were a member, or are or were connected to a member of the Scheme. We also collect personal information if you contact us in connection with your membership of the Scheme.

We collect and process the following categories of personal information about you:

- **personal contact details** – names, titles, addresses, telephone numbers and email addresses;
- **information about you** – dates of birth, gender, marital status, dependents, next of kin, passport, marriage certificate and (in some exceptional circumstances) criminal records;
- **payroll information** – National Insurance numbers, payroll numbers, bank account details, tax status, salary information; and
- **pension benefits** – information about the pension benefits that you have accrued, investment choices death benefit nomination forms and any other expression of wishes and the identities of other beneficiaries such as dependents and next of kin.

If you are connected to a member of the Scheme, we will process your personal contact details and information about you and also your identification documents (such as passport, driving licence, birth certificate).

### What sensitive personal information do we collect and process?

We usually only ask for sensitive personal information when it is required to help us make a decision in relation to your rights under the Scheme. For example, we may request:

- health information / medical records – we may ask you to provide health information if you request payment of a benefit that can only be paid if you meet certain medical criteria (e.g. ill health early retirement benefits). In addition to receiving this information from you, we may receive medical information from third parties such as your doctor or a third party occupational health provider; or
- other sensitive personal information – we may ask you to provide other sensitive personal information (e.g. information about your personal relationships) if it is relevant to help us decide on an internal dispute resolution procedure.

In addition, certain categories of sensitive personal information (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Scheme (e.g. birth certificates, marriage certificates, driving licences and passports) and determine the status of your relationship. You may also decide to provide us with special category data voluntarily (e.g. when raising queries or making a complaint).

### How do we collect your personal information?

When you join the Scheme, you and/or your employer provide personal details so that we can create your membership record.

This information is updated whilst you are a member of the Scheme. Updated information may come from:

- you (e.g. if you get in touch to let us know a new address);
- your employer (e.g. updated salary and payroll information); and
- other third parties (e.g. if you contact the Scheme's administrator to update your personal information or if HMRC provides us with information so that we can deduct the correct level of tax), or if we need to obtain documentation (such as birth certificates or death certificates) from local authorities.

In addition, we may request additional information in certain circumstances (e.g. if you request to transfer your benefits to another pension scheme, if you apply for ill-health benefits or when you ask for your benefits to start being paid).

## **Why do we process your personal information?**

We use this information to:

- set up your membership record for the Scheme;
- manage your membership of the Scheme;
- send you information that is relevant to your membership of the Scheme;
- calculate and pay any benefits that you are entitled to;
- comply with our legal and regulatory duties;
- help manage risks and liabilities in the Scheme;
- help the Scheme's sponsoring employers comply with their legal and regulatory duties; and
- communicate with members with information about the Scheme.

## **What are our legal grounds for processing your personal information?**

### **In order to comply with our legal obligations**

As the Trustees of the Scheme, we are under legal obligations to process your personal information in order to comply with pensions and other relevant legislation, the Scheme's rules, court rulings and Pensions Ombudsman decisions. For example:

- legislation sets out certain things that trustees must do (e.g. sending certain information to the Scheme's members); and
- the Trustees are subject to fiduciary duties under trust law to act in line with the Scheme's governing documentation and to act in the best interests of the Scheme's beneficiaries.

It is necessary for us to process your personal information in order to comply with these legal obligations.

### **In order to fulfil our legitimate interests**

Processing your personal information is also lawful if it is based on our 'legitimate interests'. The Trustees have a legitimate interest in running and managing the Scheme and managing the Scheme's risks and liabilities. In addition, certain third parties may have legitimate interests which require the processing of your personal information by the Trustees (e.g. your employer may need information in order to comply with regulatory requirements).

In order to rely on this legal ground, we have:

- considered the impact the processing has on your interests and rights; and

- implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

## What are our legal grounds for processing your sensitive personal information?

There are four legal grounds that allow us to process your sensitive personal information:

- when we obtain **explicit consent** from you (e.g. when you sign one of the Scheme's consent forms);
- when processing is **necessary** for carrying out obligations under employment, social security or social protection law. This includes obligations under pensions law;
- when we need to establish, exercise and **defend legal claims**; and
- when processing is **necessary** for reasons of substantial public interest (which, under the Data Protection Act 2018, applies to certain processing by trustees of occupational pension schemes when making decisions about benefits).

We may also process special category data about a nominated beneficiary who is your parent, grandparent, great grandparent or sibling without consent if it is necessary for determining eligibility or benefits under an occupational pension scheme and it does not involve measures or decisions about you. In such circumstances, we may rely on paragraph 21 of Schedule 1 of the Data Protection Act 2018.

## What would happen if we did not collect and process your personal information?

If we did not collect and process your personal information then:

- we would not be able to manage or administer the Scheme appropriately;
- we would not be able to pay you the benefits that you are entitled to under the Scheme; and
- we would be in breach of our legal and regulatory duties.

## How long do we keep your personal information for?

The Scheme was set up to provide benefits over a very long time. The Trustees need to maintain records in order to properly run the Scheme, to determine who should receive what level of benefits and when they should receive them and to respond to any disputes about an individual's rights under the Scheme.

As a result, the Trustees will generally keep your personal information for the lifetime of the Scheme plus 15 years (the longest period of time that someone can bring a claim against the Scheme). Our service providers (and former service providers) may also have similar valid grounds to keep your personal information for such long periods in accordance with their respective privacy notices.

## SECTION TWO

# USING AND SHARING YOUR PERSONAL INFORMATION

### How do we keep your personal information secure?

We use a range of measures to safeguard your personal information, in line with the requirements set out in the Data Protection Legislation. These apply to both paper and electronic records. We also require our third party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal information.

### What do we do with any personal information that is provided by third parties?

We receive personal information from sources other than directly from you. This includes information shared by your employer, the Scheme's administrator, its professional advisers, service providers and other relevant third parties.

When we receive this information, we add it to the information we already hold about you in order to help us make sure that your details are as up to date and accurate as possible so that we can manage your membership of the Scheme.

### Who do we share your personal information with?

For the purposes of administering and managing the Scheme, managing its risks and liabilities, and paying benefits under it, the Trustees may need to share your personal information with third parties. This will include your employer (e.g. the payroll and HR teams). It will also include third parties who provide advice or services to the Trustees. These may include actuaries, administrators, auditors, insurers, prospective insurers, lawyers, medical advisers, qualifying pensions dashboards providers, providers of investment platforms and products and any other third parties engaged by us in connection with the operation of the Scheme.

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in a single, secure place. As part of this, we were required by law to connect to the pensions dashboard architecture which involved preparing our member data so that our systems would connect to the ecosystem. As part of the dashboards, we are receiving information about individuals and matching it against the data we hold about members on our systems (to verify if a person has a pension with us). Once a match has been achieved, we will be making certain pensions data available to the specific individual.

In light of a 'possible match' we may carry out further data processing to verify whether you have a pension with us.

If you use the pensions dashboards to access information about you, you will be providing certain information (including your name, date of birth and address) to the dashboards ecosystem (including the identity service, the pension finder service and the consent and authorisation service).

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the integrated service provider(s) that our administrator has in place to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these dashboards duties, we may also need to report information (which could potentially include personal information) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

We've set out a list of the key third parties with whom we share your personal information (see page 16).

Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers also act as data controllers in respect of your personal information. We've included links to their online privacy information if you want to find out more about how they process your personal information.

The Scheme Actuary acts as a data controller and uses your personal data to advise the Trustees on the financial management of the Scheme. This advice helps to ensure the Trustees are able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal information to The Pensions Regulator or HM Revenue and Customs.

## SECTION THREE

# YOUR RIGHTS AND WHO TO CONTACT

### What rights do you have in respect of your personal information?

You have the following rights in respect of your personal information:

- the right to **object** to us processing your personal information;
- the right to request **access** to personal information relating to you;
- the right to request that we **correct any mistakes** in your personal information;
- rights in relation to **automated decision taking**;
- the right to request to **restrict or prevent processing** of your personal information; and
- the right to request to have your personal information **transferred** to another data controller (e.g. if you decide to transfer your pension benefits to another pension scheme); and
- the right to request to have your personal information **deleted**.

We've set out more information about these rights in part two of the additional information starting on page 12.

### How will we respond to your request?

We will usually respond to any request that you make in relation to your rights within a month of receiving your request. If your request is particularly complex, we will let you know that we've received your request and let you know when we aim to respond. You can find out more about your rights under the Data Protection Legislation at **[www.ico.org.uk](http://www.ico.org.uk)**.

Under the Data Protection Legislation there are exemptions which mean that we may continue to process your personal information (for example where we need to comply with a legal requirement or have a legally valid legitimate interest in doing so), even if you ask us not to.

### What should you do if you have any questions or complaints?

You may be entitled to compensation for damage caused by breach of the Data Protection Legislation. If you do not think that we have processed your data in accordance with this notice, please contact us in the first instance (see 'How to contact us' below). If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at **[www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)** or by calling their helpline on 0303 123 1113.

### How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to [samworthadmin@lcp.uk.com](mailto:samworthadmin@lcp.uk.com) or write to us at: Lane Clark & Peacock  
St Paul's House  
St Paul's Hill, Winchester  
Hampshire  
SO22 5AB

Alternatively, you can call the Scheme's helpline on

020 3922 1320



## **FURTHER INFORMATION - PART ONE**

# **MORE ABOUT HOW AND WHY WE PROCESS YOUR PERSONAL INFORMATION**

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
Addresses	We use this information so that we can send you information that we are legally required to provide you with. In addition, we use this information to get in touch with you when we need to in order to run the Scheme. Finally, we use this information to send you information that we think will be relevant to you as a member of the Scheme.	We have a legal obligation to send certain information to members of the Scheme.  In addition, we may send additional information to fulfil our legitimate interest of running the Scheme.	You provided this information when you filled in a membership application form to join the Scheme.  Your Scheme employer may share updated information if you update your records with HR. In addition, you may have updated your information by contacting us or the Scheme's administrator.  If a member's details are not kept up to date, we may lose contact with that member. In these cases, we may use a third party tracing agent to obtain up to date contact information.
Telephone numbers			
Email addresses			
Names and titles	We use this information to identify you and to create and update your membership record in the Scheme. This data may also be used as identifiers for the pensions dashboard ecosystem.	We have a legal obligation to pay the correct level of benefits to the correct individuals. This requires us to obtain and update this information.	The Scheme's administrators create a unique reference number so that your records can be easily identified.
Dates of birth			
Gender			
Marital status	We use this information to help us decide who should receive what level of benefits from the Scheme.	We also have a legal obligation to properly identify individuals who receive or may receive benefits from the Scheme.  We have a legal obligation to comply and connect with the Pensions Dashboard programme.	Your bank details provided by you when you fill in your membership form and when you update your details.
Dependants			
Next of kin			
National Insurance numbers	We use this information to identify you and to create and update your membership record in the Scheme. Your National Insurance number is also needed so that we can receive the correct information from HMRC and so that we can deduct the correct level of tax from your benefits. This data may also be used as identifiers for the pensions dashboard ecosystem.	The Trustees are also required to comply with tax legislation and deduct the correct level of tax from benefits.	Your tax status is provided to us by your employer and/or HMRC.
Employment start date			
Payroll number			
Scheme reference number	We use this information in order to pay your benefits under the Scheme directly to you.	Processing this information also fulfils the Trustees' legitimate interests in running and managing the Scheme.	Your salary details are provided to us by your Scheme employer.
Bank account details			
Tax status			
Salary details	We use this information to calculate the correct level of your benefits under the Scheme.		

Details about your entitlement to pension benefits under the Scheme	We use this information to calculate the correct level of your benefits under the Scheme.	See the section immediately preceding.	Details about your entitlement to pension benefits under the Scheme may be provided by your Scheme employer or may be determined by reference to the Scheme's governing documentation. In addition, the Scheme's actuary and administrators will carry out calculations, the results of which will be added to your record.
Investment choices	We use this information to ensure that your additional voluntary contributions and/or money purchase benefits are invested in the correct investment fund.	We have a legal obligation to ensure that the Scheme is run properly and in line with its governing documents. There is also specific legislation that governs payment of contributions into money purchase investment funds.	We (or our third party providers) give you information about the investment options that are available to you. You then provide us with your choices and any changes to your investment choices.
Death benefit nomination forms	We use this information as part of our decision making process when deciding who will receive death benefits.	As Trustees of the Scheme, we have a legal obligation to make decisions in line with	You provide us with the information that is contained on our death benefit nomination forms.
Medical information (including medical records and doctors' opinions)	We use this information as part of our decision making process when deciding ill health benefits under the Scheme.	trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We	Medical information relating to you may be provided directly by you, by your Scheme employer, your doctor or by a third party providing health assessments / reports.
Information about your personal relationships	This information is used to determine who is entitled to benefits in relation to your membership of the Scheme.	also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.	This information is usually provided by you. In certain circumstances, we may also need to obtain information from relevant third parties.

<p>Certified copies of official documents, including:</p> <ul style="list-style-type: none"> <li>• passport;</li> <li>• driving licence;</li> <li>• birth certificate;</li> <li>• marriage certificate</li> <li>• death certificate; and</li> <li>• decrees nisi / absolute.</li> </ul>	<p>This information is used to:</p> <ul style="list-style-type: none"> <li>• identify a beneficiary of the Scheme;</li> <li>• determine the status of your relationship with the member of the Scheme;</li> <li>• determine if you are eligible to benefits under the Scheme; and</li> <li>• trigger certain processes in respect of your benefits under the Scheme (e.g. payment of death benefits or splitting of benefits in cases of divorce).</li> </ul>	<p>As Trustees of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time. Certified copies of official documentation are sometimes essential for the Trustees to make legally valid decisions.</p>	<p>This information is usually provided directly by you or from your next of kin. In more unusual cases (e.g. when we are having difficulty locating a member or identifying their next of kin) publicly available official documentation may be obtained by a third party tracing agent.</p>
<p>Information about criminal convictions of anyone who may be claiming benefits under the Scheme</p>	<p>This information is used to ensure that benefits are not paid where a crime has been committed in order to obtain them, or where any other party is entitled to all or part of the benefits as a result of you or another person's criminal activities (which bar that person from entitlement).</p>	<p>This processing is necessary for substantial public interests in order to comply with a statutory obligation and/or to prevent or detect unlawful acts.</p> <p>Processing this information also fulfils the Trustees' legitimate interests in running and managing the Scheme.</p>	<p>This information is usually provided by you or those individuals who may be claiming benefits under the Scheme. In certain circumstances, we may also need to obtain information from relevant third parties.</p>

## FURTHER INFORMATION - PART TWO

### MORE ABOUT YOUR RIGHTS UNDER THE GDPR

As a data subject, you have a range of rights under the Data Protection Legislation. These rights are explained in more detail below. If you have any comments, concerns or complaints about our use of your personal information, please contact us directly.

You can email [samworthadmin@lcp.uk.com](mailto:samworthadmin@lcp.uk.com) or write to us at:

Lane Clark & Peacock LLP  
St Pauls House  
St Pauls Hill, Winchester  
Hampshire  
SO22 5AB

Alternatively, you can call the Scheme's helpline on 020 3922 1320

### Right to object to our processing of your personal information

You may object to us processing your personal information where we are relying on a legitimate interest as our legal grounds for processing. Our legal grounds for processing are set out in part one of the further information (see page 9).

If you have the right to object to processing (i.e. for personal information that we process in order to fulfil our legitimate interests or the legitimate interests of a third party) **and** you exercise this right we will no longer be able to process your personal information **unless** we can demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in part one of the further information (see page 9).



The key point to note is that, if we cannot continue to process your personal information, we would be unable to ensure that we are providing the correct level of benefits in respect of your membership of the Scheme. As we are legally required to pay the correct level of benefits to the right people at the right time, in these circumstances we may have to delay or even stop payments / requests until we have sufficient information.

### Right to access personal data relating to you

You can ask us to confirm whether we are processing your personal information. If we are, you may ask us to provide the following:

- a copy of your personal information (please note that, if you want more than one copy of your personal information, we reserve the right to charge a reasonable fee based on our administrative costs for the provision of such further copies);
- details of the purpose for which your personal information is being, or is to be, processed;
- details of the recipients or classes of recipients to whom your personal information is, or might be, disclosed, including, if the recipient is based in a country outside of the UK, what protections are in place in relation to the transfer to that recipient;
- the period for which your personal information is held (or the criteria we use to determine how long it is held);
- any information available about where we obtained your personal information; and
- confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person if possible.

There are certain types of information which we are not obliged to disclose to you, which include personal information which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

### **Right to correct any mistakes in your information**

You can require us to correct any mistakes (including adding missing information) in any of the personal information concerning you which we hold. Please contact us using the contact details set out at the beginning of this section.

### **Rights in relation to automated decision taking/making**

The Trustees do not use automated decision making or profiling.

Automated decision making occurs when decisions are taken solely on automated processes. Under the Data Protection Legislation, you have the right to ask that, if you are being evaluated (for example, when a bank carries out credit checks before making decisions on issuing loans or credit cards), any decisions are not solely based on automated processes and to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example where the decision is authorised or required by law and steps have been taken to safeguard your interests.

### **Right to request that we restrict the processing of your personal information**

You may request that we restrict the processing of your personal information in any of the following circumstances:

- where you do not think that your personal information is accurate. In this case we will start processing again once we have checked whether or not your personal information is accurate;
- where the processing is unlawful, but you do not want us to erase your information;
- where we no longer need the personal information for the purposes of our processing, but you need the information to establish, exercise or defend legal claims; or
- where you have objected to processing because you believe that your interests should override our legitimate interests. In this case we will start processing again once we have checked whether or not our legitimate interests override your interests.

If our processing is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

### **Right to request that we delete your personal information**

You can ask us to delete your personal information where your personal information is being processed on a legal ground other than for complying with a legal obligation and:

- you believe that we no longer need to process it for the purposes set out in this privacy notice;
- you had given us consent to process it, but you withdraw that consent and there is no other legal ground upon which we can process it;
- you have successfully objected to our processing it; or

- it has been processed unlawfully or has not been erased when it should have been.

### **Right to request transfer of your personal information**

You may, in specified circumstances, ask a data controller to provide you with an electronic copy of personal information that you have provided to it, or to have such a copy transmitted directly to another data controller.

Those circumstances do not, however, generally apply in relation to our processing of your personal information in connection with the Scheme. This is because:

- our legal grounds for processing will not normally be that you have consented to the processing; and
- we do not carry out processing by automated means.

### **Right to withdraw consent**

We usually only request your consent when we ask you for sensitive personal data. You have the right to withdraw any consent you have given us at any point.

However, as highlighted above, the Trustees only request sensitive personal data that is required to make decisions in respect of specific member benefits or complaints. If you withdraw your consent for us to process this information, we may have to delay or even stop payments / requests until we have sufficient information.

### **What will happen if your rights are breached?**

You may be entitled to compensation for damage caused by breach of the Data Protection Legislation. If you do not think that we have processed your information in accordance with this notice, please contact us in the first instance.

If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at **[www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)** or by calling their helpline on 0303 123 1113.

## FURTHER INFORMATION - PART THREE

### THIRD PARTIES AND TRANSFERS

For the purposes of administering the Scheme and paying benefits under it, the Trustees may need to share your personal information with certain third parties. This section lists the key third parties with whom we share your personal information.

ROLE	THIRD PARTY	OTHER INFORMATION (IF APPLICABLE)
<b>Actuary</b>	LCP	The Scheme's actuary may be required to provide advice in relation to a member's entitlement to benefits. In order to provide this advice, we may need to share certain personal information from the Scheme's records.
<b>Administrator</b>	LCP	The Scheme's administrator is responsible for the day to day operation of the Scheme. In order to do this, they need access to the Scheme's personal information. They are also responsible for updating the Scheme's records when members get in touch.
<b>Legal advisers</b>	Gowling WLG LLP	From time to time, the Trustees need to obtain legal advice in relation to members. If personal information is relevant to the legal issue, the Trustees will share this with its lawyers as part of its instructions.  <a href="#">Click here</a> to read Gowling WLG's privacy statement.
<b>Auditors</b>	Deloitte LLP	The Scheme's auditors carry out an annual audit of the Trustees' annual report and accounts and may be provided with personal data to enable them to carry out their professional duties as part of the annual audit process.
<b>Insurers / prospective insurers</b>		For the purpose of assessing future funding strategy, the Trustee may share member data with insurers / prospective insurers, including but not limited to:  Legal & General Aviva Rothesay PIC (Pension Insurance Corporation) Just Group Standard Life



		Scottish Widows M&G Royal London Utmost Life & Pensions Blumont Annuity
<b>Muse Advisory as Secretary to the Trustees</b>		Where individual cases are referred to the Secretary it may be necessary to share personal and sensitive information in order that the case can be properly considered.
<b>Overseas payment provider</b>	Convera UK Financial Limited	Convera will make pension payments to members who are located overseas and have chosen to have their pension paid into an overseas bank account.  <a href="#">Click here</a> to read Convera's privacy statement

### Transfers of your personal information out of the EU

Your information may be transferred out of the UK. Our service providers have confirmed that they either:

- do not transfer the Scheme's data outside of the UK; or
- do or may transfer the Scheme's data outside of the UK, but only when appropriate safeguards have been put in place (such as adequacy decisions or standard contractual clauses) as approved by the Information Commissioner's Office and/or the UK Secretary of State from time to time. These protections aim to ensure the security of your personal information, safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms.

## FURTHER INFORMATION - PART FOUR

### KEY TERMS AND PHRASES

<b>Data controller</b>	means the natural or legal person or other body who, alone or jointly with others, determines the purposes and means of the processing of personal data. This means that the data controller exercises overall control over the 'why' and 'how' of a data processing activity.
<b>Data Protection Legislation</b>	means the UK data protection laws and regulations (including the UK GDPR and the Data Protection Act 2018) from time to time.
<b>Data protection principles</b>	<p>means the principles that are set out in the Data Protection Legislation relating to the processing of personal data:</p> <ul style="list-style-type: none"><li>• lawfulness, fairness and transparency;</li><li>• purpose limitation;</li><li>• data minimisation;</li><li>• accuracy;</li><li>• storage limitation; and</li><li>• integrity and confidentiality.</li></ul> <p>In addition, there is an overarching principle of accountability.</p>
<b>Data processor</b>	means a natural or legal person or other body who processes personal data on behalf of the data controller.
<b>Data subject</b>	means the identified or identifiable living individual to whom personal data relates.
<b>Information Commissioner's Office (ICO)</b>	is the UK's national data protection authority. It is a public body that is charged with regulating information rights, public sector transparency and individual's privacy in the UK.
<b>Personal data or Personal information</b>	means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number etc.
<b>Privacy notice</b>	means the information that is provided to inform individuals about what you do with personal data. Under the Data Protection Legislation, data controllers must provide accessible information to individuals about the use of their personal data.
<b>Processing</b>	means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Special categories of personal data**

(also referred to as sensitive personal data)

means:

- personal data that is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership;
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person;
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation.