

Benenden Healthcare Pension Plan (the “Plan”)

Privacy Notice

The Trustees of the Plan hold and process personal data about Plan members and beneficiaries to calculate and pay their pension benefits from it. In doing so, the Trustees must comply with data protection legislation. This notice explains how your data in relation to the Plan is used.

Information the Trustees may collect from you

As a “data controller”, the Trustees may collect and process your personal information in order to comply with their legal duties to administer the Plan. Such personal information could include your date of birth, gender, marital status, length of employment, bank details, National Insurance Number, information relating to your tax band and details of your dependants. It will also include your contact details such as residential address, email address and telephone number.

Information the Trustees may collect from others

Whilst much of the data the Trustees hold is provided by members themselves, the Trustees also hold and process data provided by the employers in respect of the Plan, HMRC, the DWP, regulatory bodies and tracing organisations.

Beneficiaries

The Trustees also receive information from members about their proposed beneficiaries who may be eligible to receive benefits on a member’s death. Where such information is provided by you, we assume that you have the consent of the relevant individual to provide this information to the Trustees and that you will share a copy of this notice with them.

Purposes for which and the basis upon which the Trustees will process your personal data

The Trustees use your personal information to administer the Plan, including to calculate and pay benefits. The ways that the Trustees will use your information include:

- Identifying you and your survivors and making sure your details are up to date
- Communicating with you
- Calculating and paying your benefits
- Making decisions – such as whether to agree to early payment or how to distribute benefits after your death

Legal basis for processing your information

The Trustees must have a legal reason (often called the legal basis) to hold and use your personal information. The legal reason for the Trustees processing your personal information is that it is necessary for the Trustees to comply

with their legal obligations as trustees of the Plan, and other legitimate interests such as the efficient management and operation of the Plan.

Sensitive personal data

The Trustees also hold some special categories or “sensitive” personal data about some members for limited and specific purposes (such as in relation to determining ill-health early retirement applications or for the payment of discretionary death benefits). The Trustees will only process such data typically with your explicit consent. Where the Trustees are relying on your consent to process the sensitive data you may withdraw it at any time. Where it is not possible or practical to obtain consent the Trustees will only hold such data where it is necessary in order to determine the benefits payable.

Storage of personal data

The Trustees will hold personal data relating to Plan members and their dependants for as long as may be necessary in order to administer benefit entitlements and to maintain records of compliance with their obligations under the Plan. Inevitably, this means that personal data may be retained by the Trustees for extremely long periods of time, including after the individual has ceased to be entitled to benefits under the Plan.

Disclosure of personal data

In the course of administering the Plan, the Trustees will engage third-party providers such as pensions administration service providers, tracing agencies, mailing providers, a Plan actuary, actuarial firms, lawyers, accountants, auditors, insurance companies, investment advisers and fund managers, IT service providers and similar external advisers. The Trustees may disclose your personal data to these third parties in connection with their services provided to the Trustees. Those third parties may also disclose your personal data to any sub-processors that they engage in respect of these services. The Trustees may also, where appropriate, share your personal data with the employers in relation to the Plan, and to their advisers, for example to assist the employers with exercises where the Plan is relevant.

The Trustees may also disclose your personal information to third parties in the following types of situations:

- in considering entering into a buy-out/buy-in of any of the benefits under the Plan, in which case the Trustees may disclose your personal data to any prospective counterparty (and any reinsurer) to such a transaction;
- if the Trustees are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirement.

In some circumstances, the Trustees’ third-party advisers (who may process your personal information to comply with their professional duties as advisers to the Trustees) are also considered as data controllers in relation to your personal information.

If you require further details about the disclosure of personal data please contact the Trustees (contact details below).

International transfers of personal data

Wherever possible, the Trustees will process your data only within the United Kingdom or European Economic Area (EEA). Certain countries outside of the EEA have been approved as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal data to these jurisdictions. The Trustees do not generally, and have no intention to, transfer or process the personal data that is collected about you outside the EEA, but if it is necessary to do this the Trustees will ensure that adequate safeguards in respect of the security of such information are in place.

Your rights in relation to your personal data

You have the right to access the personal information the Trustees hold about you. You may also ask the Trustees to correct any errors in such information. In some circumstances you may request that the use of your personal information is restricted, object to its processing and/or request that your information is erased. Please contact the Trustees in relation to any such requests (contact details below).

More information regarding your rights can be found at the website of the Information Commissioners Office (www.ico.org.uk).

If you have any concerns in relation to the Trustees' handling of your personal information, please contact the Trustees (contact details below). If your concern is not resolved to your satisfaction, you have a right to lodge a complaint with the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 or 01625 545 745

Fax: 01625 524 510

Email: casework@ico.org.uk

Contact

The Trustees can be contacted through the Plan's Administrator as follows:

Benenden Healthcare Pension Plan

Hymans Robertson LLP

20 Waterloo Street

Glasgow

G2 6DB

Phone: 0141 227 9773

Email: benendenpension@hymans.co.uk

The Trustees regularly review their Privacy Notice and will update you of any changes to it.