Pi Pension Trustees: Sole Trustee Portfolio

Privacy Notice

This privacy notice has been issued to you on behalf of the Trustee of the Scheme.

Trustee, **us**, **we** or **our** means the Trustee as defined in section 13 of this notice.

Please read this privacy notice carefully as it contains important information – however, it is for information only and you do not need to take any action.

1. Why are we sending this to you?

1.1. We are sending you this notice because you:

a) are (or have been) a former member of the Scheme; or

b) are (or might be) eligible to receive benefits following the death of a member of the Scheme.

1.2. We are required under the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018 (**DPA**), to notify you of the information contained in this privacy notice. This is because as Trustee, we, together with the Scheme actuary, legal advisers and potentially the Scheme auditors, are 'data controllers' in respect of your personal data that we 'process' (i.e. handle collect, store, transmit and erase). Therefore, we are responsible for deciding how and why we hold personal data about you.

1.3. As Trustee, we process **personal data** about you in order to run the Scheme and pay benefits. We also share your personal data with others when we need to. Personal data is any information that could be used to identify you as a living individual.

1.4. This privacy notice gives you that information – it describes what personal data we collect about you and other people (for example, your spouse, civil partner, partner or dependants).

1.5. This notice also describes how we process your personal data, the basis upon which we process it, with whom it is shared, how it is stored, how it is protected and what rights you have in relation to it (including a right to object to processing in certain circumstances).

2. What personal data do we collect about you and how?

2.1. We collect personal data from you in a number of different ways:

a) you may share information with us (for example when you join the Scheme or when you apply for benefits);

b) we may collect certain personal data from third parties (further details are below);

c) from public records (for example, the register of Births, Deaths and Marriages);

d) we may also generate certain personal data in our running of the Scheme (for example, information relating to your contributions and benefits).

2.2. We collect personal data from the following third parties:

<u>If you are (or have been) a member:</u>

a) your current or former employer;

b) any financial or other adviser or representative acting on your behalf and, if you want to transfer benefits, the trustees or managers of other pension schemes of which you are or have been or propose to be a member;

c) providers of services that allow us to verify the accuracy of your personal data (for example, to trace your current address or to verify your continuing existence); and

d) public databases (for example, the register of births, deaths and marriages), government agencies (for example, His Majesty's Revenue or Customs (HMRC) or the National Insurance Contributions Offices (NICO).

<u>If you are (or might be) eligible to receive benefits following the death of a member:</u>

e) public records (for example, the register of Births, Deaths and Marriages);

f) any adviser or representative acting on your behalf;

g) other people who knew or are related to, or were dependent upon the member, and anyone representing them;

h) the executors of the member's will or the member's personal representatives and anyone representing them.

The types of data we may collect and use are set out in section 12.

2.3. In certain circumstances, we may ask you for personal information which is more sensitive. Examples would be where we ask for information that may reveal your racial or ethnic origin, religious beliefs, sexual orientation, or information relating to your health (for example, if you cannot work any longer due to incapacity and you want to take your pension benefits early). Such information may constitute **special category data** for the purposes of the UK GDPR.

2.4. When we ask for sensitive information, we will only ask for as much information as we need. We will also explain to you why we need that information and how we intend to use it.

2.5. When we need to, we will ask for your consent for us to use your sensitive information. However, there are some instances in which we do not need your consent, and can lawfully process it for another reason permitted by data protection legislation (for example, where we need to use it to establish, exercise and defend legal claims).

2.6. You may also need to provide us with personal data relating to other people (for example, your spouse, civil partner, partner or dependants). When you do so, you will need to check with them that they are happy for you to share their personal data with us and for us to use it in accordance with this privacy notice.

3. How do we use your personal data?

3.1. We collect your data for the primary purpose of operating the Scheme. This involves:

a) communicating with you;

b) requests or queries by you or third parties;

c) calculating and paying benefits to you from the Scheme;

d) establishing your eligibility for benefits;

e) calculating and managing contributions;

f) allocating death benefits;

g) transferring your benefits to another scheme;

h) investing pension scheme assets or making investment decisions;

i) managing the Scheme's liabilities;

j) taking steps to reduce risks affecting the security of your benefits;

k) purchasing insurance products including annuities;

l) compliance with contracting-out requirements;

m) compliance with legal obligations and guidance issued by the Pensions Regulator;

n) scheme audits;

o) demonstrating that duties/requirements have been complied with;

p) monitoring and payment of tax charges, reporting to/providing information as required to HMRC;

q) preparing accounts;

r) actuarial valuations and calculations;

s) legal claims;

t) dealing with disputes;

u) dealing with the sale, merger or reorganisation of the Scheme employers;

v) statistical analysis/government or regulatory surveys;

w) reviewing past transfer payments to address GMP inequality.

3.2. If we or the other Data Controllers involved with the Scheme wish to use your personal data for any additional purposes, we will update this privacy notice.

4. What is our lawful basis or ground for using your personal data?

4.1. Under laws which are designed to protect your personal data, we need to have what is called a lawful basis each time we use, share or otherwise process your personal data.

4.2. As Trustee, we have certain duties and powers which are conferred on us by law or by the Scheme's governing documents. In most cases, our processing of your personal data is necessary for the performance of those duties and exercise of those powers.

4.3. Certain uses of your personal data, or other processing activities, will not be strictly necessary to perform our legal duties, or to exercise our powers; however, they will be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

4.4. When we say **legitimate interests**, we mean ours (or a third party's) interests in operating the Scheme as efficiently, effectively, lawfully and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

4.5. If we are processing personal data in a certain way because it is in ours (or a third party's) legitimate interests (and not, for example, because it is necessary for the performance of our legal duties), you have the right to object to this processing.

4.6. In certain circumstances, we will need your consent to collect and use your personal data; this is most likely where we are collecting information relating to your health or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs or sexual orientation for the payment of death benefits. If we have asked for your consent, you may withdraw your consent at any time.

4.7. You may withdraw your consent or object to our processing of your personal data in a certain way (where you have the right to do so), by contacting the Trustee using the details shown at the end of this notice. If you do withdraw consent, this will not affect the lawfulness of any processing that was based on your consent before its withdrawal.

4.8. However, if you withdraw your consent or object to our processing of your personal data, this may impact our ability to consider whether you are eligible to receive benefits, put your benefits into payment, and or continue to pay benefits to you.

5. In what circumstances do we share your personal data?

5.1. We will share your personal data with the following categories of third parties:

a) your current or former employer (through whom you were linked to the Scheme) - for the purposes of operating the Scheme, or the future operation of the Scheme;

b) our administrators – we delegate some of our duties as Trustee to administrators; they are effectively responsible for the day-to-day running of the Scheme;

c) the Scheme actuary – this is an actuary that is personally appointed to the Scheme to provide us with advice on the funding of the Scheme. The actuary will be supported by an actuarial team who will also have access to your personal data;

d) our benefit consultants – they provide advice on all aspects of running the Scheme including the level and form of benefits to be provided to members of the Scheme, investment, member communication and strategies for managing and mitigating the risks associated with the Scheme;

e) Pi Consulting (UK) Limited to the extent that this company provides employees who perform secretarial or scheme management services in respect of the Scheme;

f) our insurers – they provide insurance cover for the payment of death benefits and / or provide annuity policies securing the Scheme benefits;

g) our investment managers and any additional voluntary contribution (AVC) providers – they invest the Scheme assets on our behalf;

h) our annuity broker/retirement advice/support service;

i) our auditors – they prepare the Scheme's annual accounts and audit them for us;

j) our lawyers – they advise us on all legal issues affecting the Scheme;

k) our covenant advisers – they advise us on the financial support that your current or former employer may be able to provide to the Scheme;

l) our payroll agents – they arrange payment of pensions;

m) our indemnity insurers;

n) any staff we employ and other companies that provide services to us (or to our administrators), such as communications consultants, printers, suppliers of data cleansing, verification and tracing services and information technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services;

o) any financial adviser you appoint in relation to transferring your benefits to another pension scheme (and the trustees or managers of the pension schemes you transfer or your benefits are transferred to); and

p) statutory bodies (for example, the Pension Protection Fund), or government agencies in connection with contracted-out benefits (for example, HMRC and the National Insurance Contributions Offices (NICO)).

5.2. The names and contact details of the third parties that we share your personal data with are available from us on request from the Trustee using the contact details shown at the end of this notice.

5.3. Some of these third parties process your personal data in countries which are outside of the United Kingdom (UK). Please see section 6.

5.4. We will also disclose your personal data to third parties:

a) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or any lawful request from any legal or regulatory authority; or

b) to respond to any claims, and to establish, exercise or defend our legal rights.

5.5. As Trustee, we are a 'data controller' of your personal data. This means we are responsible for keeping your personal data safe and secure.

5.6. Some of the third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. They are known as 'data processors'.

5.7. We will ensure that any data processors with whom we share your personal data are subject to privacy and security obligations consistent with applicable laws.

5.8. Certain third parties (most notably, the Scheme actuary, our benefits consultants, insurers, auditors, lawyers and other professional advisers) are subject to certain legal or regulatory obligations, including professional codes of practice. They will be 'data controllers' (and so directly responsible to you for their own processing of your personal data) to the extent that processing is subject to, or relates to, those obligations.

5.9. Accordingly, some of these data controllers have their own, separate, privacy notice which applies to their use of your personal data instead of this notice.

6. Do we transfer your personal data outside the UK?

6.1. In certain circumstances, your personal data may be processed outside of the UK; for example, by authorised representatives of the Trustee who are operating or travelling outside the UK and / or by third party service providers that may store certain personal data in a country outside the UK.

6.2. When we (or our service providers) process personal data outside of the UK, we take appropriate measures to ensure that your

personal data is adequately protected in a manner which is consistent with this privacy notice, and in accordance with applicable laws.

6.3. Those measures include ensuring that they are based in countries that have been deemed, by the Secretary of State in the UK, to be adequate (which includes the countries within the European Economic Area), or entering into UK approved standard contractual clauses with them (such as for those based or accessing personal data from the United States).

6.4. Where personal data is transferred outside of the UK on the basis of the standard contractual clauses, we may also need to undertake a 'transfer impact assessment' to assess whether those clauses are sufficient by themselves, or if we (or our service providers) also need to take additional supplementary measures (for example, by encrypting personal data, or by having a process in place for notifying us of requests to access personal data stored by them).

6.5. If you have any queries on this issue, you can contact us using the details at the end of this notice.

7. How long do we retain your personal data?

7.1. We keep your personal data for no longer than we need to for the purpose of the operation of the Scheme.

7.2. Therefore, we will likely need to keep your personal data for as long as you are a member of, or are receiving benefits from, the Scheme. If you cease being a member because you die, we will continue to hold your personal data to pay any benefits due to your spouse, civil partner, partner or dependants.

7.3. We will also keep your personal data for as long as necessary to answer any questions about the administration of the Scheme, deal with any complaints or claims, exercising or defending our legal rights, or complying with any legal or regulatory requirements. We will keep your personal data even if you have no spouse, civil partner or dependants, or if your spouse, civil partner or dependants die, or if you transfer out of the Scheme.

7.4. We need to keep your personal data this long because of the long-term nature of pension schemes, and the fact that questions can arise many years after someone has died or left the Scheme**.**

8. What are your rights in relation to your personal data?

8.1. You have the following rights in relation to your personal data. You can ask us for more information about any of these rights by contacting us using the details at the end of this notice:

a) **Right of access.** You have a right of access to any personal data we hold about you, including asking us for a copy of your personal data;

b) **Right to update your information.** You have a right to request an update to any of your personal data which is out of date or incorrect;

c) **Right to delete your information.** You have a right to ask us to delete any personal data which we are holding about you in certain specific circumstances;

d) **Right to restrict use of your information:** You have a right to ask us to restrict the way we process your personal data in certain circumstances;

e) **Right to data portability:** You have a right to ask us to provide your personal data to a third party provider of services in certain circumstances;

f) **Right to object.** Where we process your personal data on the basis of our, or another person's, legitimate interest, you have a right to ask us to consider any valid objections which you have to our use of your data.

8.2. If you want to exercise these rights, please contact the Trustee using the contact details provided at the end of this notice.

8.3. We will consider all requests from you to exercise your rights (including whether they apply in a particular case) and provide our response within a reasonable period. In any event we will provide a response within one month of your request, unless we tell you we are entitled to a longer period.

8.4. Please note that certain personal data may be exempt from such requests, for example if we need to keep using the information to comply with our own legal obligations. If an exception applies, we will tell you this. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

9. How do we keep your personal data secure?

9.1. The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to take all reasonable precautions to safeguard the confidentiality of personal data.

9.2. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access, and take steps to ensure that any third parties with whom we share data do the same.

9.3. Where we have given you (or where you have chosen) a password which enables you to access an account relating to your membership of the Scheme, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

10. Changes to this privacy notice

10.1. We may amend this privacy notice from time to time. Any changes we make we make to our privacy notice in the future will be notified to you in the next communication from us, such as the annual summary funding statement, your annual benefit statement (if sent), member newsletter, or an updated version of the explanatory booklet.

11. Further questions or complaints

11.1. If you have any queries or complaints about our collection, use or other processing of your personal data, or if you wish to exercise any of your rights described in this Notice, please contact the Trustee using the details at the end of this notice.

11.2. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.

11.3. You may also make a complaint to the UK Information Commissioner's Office (https://ico.org.uk/), the UK's data protection regulator. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

12. Personal data we process

12.1. We may collect and use the following categories of personal data about you and, in some cases, your spouse, civil partner, partner or dependants:

a) name(s);
b) gender;
c) national insurance number;
d) employee and membership number;
e) passport number/ID card number;
f) date of birth;
g) birth/adoption certificate details;
h) home address and telephone number;
i) personal e-mail address;
j) marital status and family / dependants (including details of any marriage or civil partnership certificates, decree absolutes or final orders);
k) your current or former employer;
l) the date you joined and left employment and employment status (e.g. full time or part time);
m) dates on which you joined and left pensionable service;
n) your salary information;
o) your normal or anticipated retirement date;
p) your status as a member of the Scheme;
q) circumstances of retirement or leaving service;

r) information relating to your health (e.g. in relation to incapacity benefits);

s) information on criminal convictions;+

t) information relating to your benefits (including any contracted-out benefits);

u) information relating to any money purchase benefits in the Scheme (including how these are invested);

v) information relating to any pension sharing or earmarking order);

w) tax information, your income tax band, and any protections you have in relation to your benefits;

x) your bank account details;

y) any technical information (IP addresses etc.) where we operate web-based interaction.

13. Defined terms

13.1. In this privacy notice, the following terms have the following meanings:

Data controllers, **us**, **we** or **our** means collectively the Trustee, the Scheme actuary, the Scheme auditor and the Scheme lawyer as co-controllers of the personal data relating to the Scheme;

Scheme means an occupational pension scheme of which the Trustee is the sole trustee;

Trustee means the trustee company from the list below that is appointed to the Scheme:

- Pi Consulting (Trustee Services) Ltd (Registration number: 4261011);
- Temple Trustees Limited (Registration number: 9955760);
- Fairfield Pension Trustees (Registration Number 3432252);
- Pi Trustee Services 5G Limited (Registration number: 9503013),
- Align Pensions Limited (Registration number: 11960909).

Authorised Representatives in this policy shall mean the any person authorised by the Trustee in relation to the Scheme from time to time, including but not limited to a statutory director of the Trustee.

14. Trustee's contact details

14.1. The Trustee may be contacted at:

Trustees of the [insert Plan name]
c/o Pi Partnership Limited
2nd Floor, Tuition House
27-37 St George's Road
Wimbledon
London
SW19 4EU

Alternatively, you can call the Plan's helpline on 020 8879 6500 or email gdpr@pipg.co.uk.

This privacy notice was last reviewed and updated January 2025.