

LSR Pension Scheme - Privacy Notice

This updated Privacy Notice has been issued by the Trustee and Scheme Actuary of the LSR Pension Scheme (the Scheme)

We are required under data protection legislation (called the UK General Data Protection Regulation or the “UK GDPR” and, the Data Protection Act 2018 or the “DPA”), to notify you of the information contained in this privacy notice. This is because the Trustees, together with the Scheme Actuary are ‘joint data controllers’ in respect of your personal data that we ‘process’ (i.e. collect, store, transmit and erase) and therefore are responsible for deciding how and why we hold personal data about you.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data controllers

In accordance with guidance issued by the Information Commissioner’s Office (ICO), the Trustee and Scheme Actuary of the Scheme are considered “joint data controllers” (the holders, users and processors of personal data) for the purposes of the UK GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Scheme’s auditor or legal advisers.

The Scheme Actuary to the Scheme is Richard Soldan of Lane Clark & Peacock LLP (“LCP”).

The joint Data Controllers can be contacted as follows:

Lane Clark & Peacock LLP
95 Wigmore Street
London
W1U 1DQ

Email: lsradmin@lcp.uk.com

Telephone: 01962 870060

Use, transfer and storage of personal data

In the course of running the Scheme, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner’s) health. Such information will be used by the Scheme’s administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme).

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- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Scheme).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the data controllers by the principal and/or participating employer of the Scheme or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme. We will keep your personal information for as long as we have a relationship with you or your dependents. When deciding how long to keep your personal information after that relationship ends, we take into account our legal obligations and regulators' expectations.

We may hold and process special categories of personal data about you concerning health or sexual orientation.

The circumstances in which we may gather such information could include obtaining data about other people to whom benefits could be payable on your death, such as your partner, spouse or civil partner or circumstances of serious ill health where you may want to take your benefits early or in a different form.

We will only process special categories of personal data where we need to do so to establish a right to a benefit (in any other circumstances where we need to process special categories of personal data we will seek your prior consent, unless we can lawfully process it for another reason permitted by data protection legislation). Where we gather this information, we will explain to you at the time why we need it and how the information will be used.

Where you have given your consent to the processing of your personal data, this can be withdrawn at any time. If you do withdraw consent, this will not affect the lawfulness of any processing that was based on your consent before its withdrawal.

The Trustee shares your data with the Scheme's administrator LCP, Scheme Actuary, the sponsoring employer and AVC providers. They may also share data with the Trustee's other professional advisers (including the legal adviser, Scheme Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator). We have measures in place to protect your data and when sharing your personal data with the administrator or another third party we will make sure that they too have appropriate measures in place to protect your data.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive.

The Scheme administrator, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's **legal obligation** to run the Scheme in accordance with the Trust Deed and Rules. The Trustee and/or administrator may contact you directly in order to provide relevant information, or to deal with your queries.

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In addition, it is in your and the Trustee's **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme so that the correct benefits can be paid
- Undertake risk-management exercises so that the risk your benefits are not paid is reduced
- Comply with the law, including regulations and guidance issued by the Pensions Regulator so that you, the Trustee and their advisers are not subject to legal sanctions which may impact benefits
- Efficiently manage the impact of any change to the legal status of the sponsoring company so that your benefits are not adversely affected for example by a sale or company merger

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits and is necessary to comply with obligations placed on them by legislation.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

We may need to transfer your personal data outside of the UK. For example, should one of the Scheme's service providers be based or store information outside the UK or where your permanent residence is outside the UK, to the extent that we need to communicate with you.

If we (or our service providers) process, store or transfer personal data outside of the UK, we will take appropriate actions to ensure that your personal data is sufficiently protected in a manner consistent with this privacy notice, and in line with applicable laws. We will only transfer personal data outside of the UK if one of the following applies:

- The ICO has issued a decision confirming that the country to which we transfer the personal data ensures an adequate level of protection for the data subjects' rights and freedoms.
- Appropriate safeguards are in place such as binding corporate rules, standard contractual clauses or international data transfer agreement approved by the ICO, an approved code of conduct or a certification mechanism.
- You have provided explicit consent to the proposed transfer after being informed of any potential risks.

The transfer is necessary for one of the other reasons set out in the UK GDPR including the performance of a contract between us, reasons of public interest, to establish, exercise or defend legal claims or to protect your vital interests where you are physically or legally incapable of giving consent and, in some limited cases, for our legitimate interest

Your rights in relation to your data

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data, i.e. request to see the personal data held about you.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.

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- You have the right to request that your personal data is deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the Data Controller with the ICO.

If you would like to discuss or exercise any of these rights, please contact the Data Controller at the address above.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

Further details about the UK GDPR and your rights under the UK GDPR can be found on the ICO's website at <https://ico.org.uk/>

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