

LIFETIME PENSION SCHEME

Personal information and what we do with it

The Trustees of the Lifetime Pension Scheme (the “**Scheme**”) need personal information about you to run the Scheme and pay benefits. Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustees about how your personal information will be used for those purposes. These other parties (our ‘**Trustee Advisers**’) include:

- the Scheme Actuary from time to time (currently Rachel Hunt of Mercer); and
- the actuarial advisers, Mercer.

The Scheme Actuary can change. If you wish to know who the current Scheme Actuary is, please refer to the most recent Scheme accounts or contact the Trustees (details below).

In legal terms, the Trustees and the Trustee Advisers are ‘joint data controllers’ in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it. Information regarding the Scheme Actuary and Mercer’s use of their data in their capacity as Trustee Advisers is available from the Scheme administrators (contact details below).

In this notice you will see information about what the Trustees do with your personal information, and also what the Trustee Advisers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, ‘we’ means both the Trustees and the Trustee Advisers where they are acting as joint data controllers in relation to your personal information (as described above).

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, sex, date of birth, national insurance number and bank account information (where benefits are in payment).
- Contact details (including your address, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information (including sex and date of birth of your spouse or civil partner) we might need to pay any benefits due on your death.
- Whether you have any dependants and any other information (including sex and/or date of birth of you dependant);
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

Where we get personal information from

Some of the information the Trustees have comes directly from you. In addition, Aptia Group Ltd, who administers the Scheme on behalf of the Trustees, may have obtained information from you and passed it to the Trustees. The Trustees may then in turn pass information about you to the Trustee Advisers or may instruct the administrator to do so. The Trustees are the source of the personal information which the Trustee Advisers have about you.

Sometimes the Trustees (and/or Scheme administrators) get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if the Trustees have lost touch with you and are trying to find you. In addition, information may be obtained from electronic address tracing and mortality screening services. The Trustees may in turn pass this to the Trustee Advisers (as above).

If the Trustees ask you for other information in the future (for example, about your health), they will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Why we hold personal information and how we share it

The Trustees must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

The Trustees will use your personal information to comply with these legal obligations, to establish and defend their legal rights, and to prevent and detect crimes such as fraud. The Trustees may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

The Trustees also have a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; managing existing insurance contracts, purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

In order to achieve this, the Trustees may share your personal information with various people, including: any new trustees; the Scheme employers; the Scheme administrator; the Trustee Advisers; the Trustees' other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; and IT and data storage providers and other service providers. If your benefits are transferred to another scheme, the Trustees will also need to provide the administrators of that scheme with information about you.

The Trustees may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustees may share your personal information with service providers (such as independent financial advisers) so that they can contact you for that purpose.

When the Trustees need to use information about your health (or other very personal information), they may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustees to use this information without consent, and they will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting the Trustees using the contact details given below. This may affect what the Trustees can do for you, unless they have another lawful reason for using your information.

The Trustees may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustees may share your personal information with the employers and its advisers (which may include independent financial advisers) so that they can contact you for that purpose.

Scheme Actuary and Aptia Group Ltd

The Scheme Actuary is appointed by the Trustees to value the Scheme benefits and, together with Aptia, carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. They will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustee and the Scheme Actuary/Aptia for statistical research, but only in a form that no longer identifies you. In some circumstances the Scheme Actuary and Aptia may also be able to fulfil the purpose mentioned above using information which the Trustees have anonymised before sharing with them.

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way we tell them. However, others (including the Trustee Advisers) may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory

requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from any of the people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustees and they will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

The Trustees will keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the Trustees will keep your information for as long as is necessary to deal with queries from you or your beneficiaries (or other persons who might ask the Trustees if they are entitled to payments), complaints (from you or them) and our legal obligations.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use the Scheme administrator's contact details, which are set out below. The Scheme administrator can also supply more information about these rights to you, on request.

The Trustees have agreed with each of the Trustee Advisers that the Trustees will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise rights against the Trustees and the Trustee Advisers for what they do jointly with your personal information, you should contact the Trustees using the details below.

Keeping your information safe

When the Trustees pass your information to a third party, it seeks to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people the Trustees share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact the Trustees for more information about the safeguards they use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact the Trustees via the Scheme administrator at: Aptia Group Ltd, Post Handling Team, Maclaren House, Talbot Road, Stretford, Manchester, M32 0FP.

If you have concerns about the way we handle your personal information, you can contact us using the contact details set out above. We will investigate and respond in accordance with our

complaints handling process. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters. You can contact the ICO at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.