

The Trustees of the McKesson Defined Benefits Pension Scheme

Residual Privacy Notice (Post Buy-Out)

1. Introduction

This Privacy Notice explains how the Trustee of the McKesson Defined Benefit Pension Scheme (“the Scheme”) uses personal data following the buy-out of Scheme benefits with Aviva in February 2025.

Although individual insurance policies have now been issued by [Insurer name], the Scheme has not yet been fully wound up. The Trustee therefore continues to process some personal data for limited, residual purposes, as explained below.

For information about how your pension is administered and paid going forward, please refer to Aviva’s Privacy Notice: [Privacy Policy - Aviva](#).

2. Who is responsible for your personal data?

The Trustee of the Scheme (Vidett Trust Corporation Limited) is the data controller for the residual processing described in this notice.

Contact details:

Trustee contact address:

The Trustees of the McKesson Defined Benefits Pension Scheme
Vidett Limited
Forbury Works
37-43 Blagrove Street
Reading
RG1 1PZ

Email address: malvina.price@vidett.com

The contact details of our Data Protection Officer are:

- **Name:** Simon Riviere
- **Address:** 3rd Floor Forbury Works, 37-43 Blagrove Street, Reading, RG1 1PZ
- **Telephone:** 0118 207 2900
- **Email:** info@vidett.com

3. What personal data we process

We may process the following categories of personal data:

- Identification details (e.g. name, date of birth, National Insurance number)
- Contact details (e.g. address, email)
- Pension and benefit information
- Historical Scheme records
- Information relevant to benefit corrections or queries

4. Why we process your personal data

Following buy-out, the Trustee processes personal data only where necessary to:

- a) Complete benefit rectification and corrections
 - a. Reviewing historical Scheme data
 - b. Identifying and correcting benefit issues
 - c. Providing corrected data to the insurer

- b) Manage Scheme wind-up
 - a. Finalising Scheme liabilities
 - b. Meeting legal, regulatory, and governance obligations
 - c. Maintaining records required for audit and legal purposes

- c) Handle queries, complaints and disputes
 - a. Responding to member queries relating to pre-buy-out benefits
 - b. Managing complaints (including your right to complain under data protection law)

5. Our legal basis for processing

We rely on the following legal bases under UK GDPR:

- Legal obligation - to comply with pensions and trust law requirements
- Legitimate interests– to ensure benefits are correctly determined and liabilities properly discharged
- Establishment, exercise or defence of legal claims – where relevant

- Where special category data is processed (if applicable), this is done in accordance with Schedule 1 of the Data Protection Act 2018.

6. Who we share your data with

We may share personal data with:

- Aviva – to enable benefit corrections and updates to policies
- Scheme advisers (e.g. legal advisers, actuaries, administrators)
- Regulators and authorities where required
- Auditors

Each party will process your data in accordance with their own data protection obligations.

8. How long we keep your data

We retain personal data only for as long as necessary to:

- Complete benefit rectification
- Finalise the wind-up of the Scheme
- Comply with legal and regulatory retention requirements Data will then be securely deleted or archived.

9. Your data protection rights

You have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request restriction of processing
- Object to processing in certain circumstances *
- Lodge a complaint with the Information Commissioner's Office (ICO).

To exercise your rights, please contact us using the details above.

10. Your right to complain

If you are unhappy with how your personal data is being handled, you have the right to complain to the ICO:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Website: www.ico.org.uk

Telephone: 0303 123 1113

11. Changes to this notice

This Privacy Notice reflects the Scheme's *post buy-out residual activities* only and will be updated if required during the wind-up process. As noted above, members' benefits have been bought out with Aviva but the Trustee continues to process limited personal data in connection with benefit corrections and the winding-up of the Scheme.