

TRUSTEE OF THE NATIONAL ASSOCIATION OF CITIZENS ADVICE BUREAUX PENSION AND ASSURANCE PLAN (1991)

HOW WE PROCESS YOUR PERSONAL INFORMATION



This is a summary of how the Trustee of The National Association of Citizens Advice Bureaux Pension and Assurance Plan (1991) (the **Plan**) (the **Trustee** or **we**) obtain, store, use and share your personal information. The Trustee's detailed privacy notice is available from 25 May 2018 and you can ask us to send you a copy.



Who are we?

We are the Trustee of the Plan. This summary explains the Trustee's role as a data controller when we use your personal information in order to help us run the Plan.



Whose data do you process?

We collect and process personal information about you in your capacity as a member of the Plan or as someone who is connected to a member of the Plan.



What data do we process?

We process information such as names, contact details, marital status, dates of birth, National Insurance numbers, salary / bank details relating to the Plan's beneficiaries.



How long do we keep data for?

Because pensions are long-term benefits, we may need to keep your information for a long period of time (i.e.. the life of the Plan plus 15 years). We determine how long we keep data based on whether it is needed to calculate and pay benefits, to maintain up to date and accurate records, to be able to respond to queries from members or regulatory bodies, to comply with legal or regulatory record keeping requirements, to defend actual or possible legal claims or to comply with any other legal or contractual obligations.



Who do we share your data with?

We share your personal information with other parties who help us run and manage the Plan. This would usually include the Plan's employers, professional advisers including Plan Actuary, administrators and other relevant third parties. We may also share your information with insurance companies, independent financial advisers, other pension schemes and other relevant third parties as we seek to manage the Plan's risks and liabilities and deal with all benefit entitlements appropriately. In some circumstances, we may have to disclose your personal information by law, because a court, the police or another law enforcement agency has asked us for it. We may be required to pass your personal information to The Pensions Regulator or HMRC.



We **do not** carry out any automated decision making or profiling.



The Trustee's privacy notice is available and may be updated from time to time. Please contact the Trustee using the details overleaf to receive a copy.



Why do we process data?

We process your personal information so that we can manage the Plan and your rights under it appropriately and so that we can pay any benefits that you are entitled to.



What are the Trustee's legal grounds for processing?



Legal obligations

We process your personal information so that we can comply with various legal obligations. These include complying with legislation, the rules of the Plan and applicable court rulings and Pensions Ombudsman determinations.



Legitimate interests

Processing your personal information also enables us to pursue the Trustee's legitimate interests. These include managing and administering the Plan, paying out the correct benefits and complying with relevant legal and regulatory requirements.



What rights do you have?

Under the UK's data protection laws, you have a number of rights in respect of the processing of your personal information. This summary provides an overview of your rights. The Trustee's privacy notice sets out more detail on each of your rights.

You have the right to object to the processing of your personal information, the right to request access to your personal information and the right to request that any mistakes in your personal information are corrected. For any personal data that we process in order to fulfil our legitimate interests rather than

to comply with a legal obligation, you also have the right to request to restrict or prevent your personal information being processed, to request to have your personal information transferred to another data controller and to request to have your personal information deleted. Under the relevant data protection law, we may still have valid reasons to continue to store, process or transfer your personal information.

You can find out more about your rights under the UK's data protection laws at www.ico.org.uk. Requests in relation to your personal data must be made to us in writing. Our contact details are set out below.



How can you get in contact?



Please contact us if you have any questions about this data protection summary, the Trustee's detailed privacy notice or the information we hold about you.



Email: nacab@xpsgroup.com



0117 2020 431



XPS Administration, Queen's Quay, 33-35 Queen Square, Bristol, BS1 4LU



The Information Commissioner's Office (ICO) is the UK's data regulator. If you are not satisfied with our response, you can complain to the ICO.



www.ico.org.uk



0330 123 1113



ICO House, London, WC12 2SW



The Trustee has produced a detailed privacy notice which sets out what personal information we process, why we process it and who we share it with. The Trustee's privacy notice is available from 25 May 2018 and you can ask us to send you a copy.

February 2021