PEARL CONSULTANTS LIMITED PENSION SCHEME (the "SCHEME")

Scheme privacy notice

This privacy notice tells you what to expect us to do with the personal information of Scheme members and their survivors. It is being issued jointly by the joint data controllers in relation to the Scheme to comply with the United Kingdom General Data Protection Regulation ("UK GDPR"). The UK GDPR replaced its predecessor, the EU GDPR, after Brexit. This document replaces any Fair Processing Notice previously issued under the Data Protection Act 1998 and under the EU GDPR and is for your information only.

The data controllers in relation to the Scheme are Vidett Governance Services Limited ("the "**Trustee**").

Our contact details

For details about the Scheme, please use the usual Scheme Client Team mailbox at: pearlconsultants@vidett.com.
The contact details of our Data Protection Officer are:

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

What information we collect, use, and why

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme, and for other legitimate purposes relating to the operation of the Scheme. We hold this data in order to calculate and pay the benefits to and in respect of Scheme members.

In certain circumstances, we may need to collect some special categories of "sensitive" personal information in order to provide your pension benefits. This is most likely where we are collecting information relating to your health in relation to an application for an ill-health pension, or where in order to fulfil our obligation to provide benefits on your death, we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, or sexual orientation. In doing so, we hold this sensitive personal

information in performance of our legal obligations in connection with your employment and pension provision, and in order to establish, exercise or defend legal claims. Where we ask for your consent to holding your sensitive personal information, you may withdraw your consent at any time by contacting the Trustee at pearlconsultants@vidett.com.

We collect or use the information to **comply with legal requirements** which comes from various sources:

Information we may collect directly from you

The categories of personal information that we collect directly from you include:

(a) personal details (for example, your name, date of birth, address);
(b) your bank details and national insurance number;
(c) your contact details (for example, your address, phone number and email address);
(d) details about your family and dependants, so that depending on the rules of your Scheme, we can pay any pension benefits to your spouse / partner / children on your death; similarly, you can tell us who you would like us to consider paying any lump sum benefits on your death[1];
(e) where applicable, your choice of fund for your contributions (and any contributions from your employer) to be paid into, where applicable;
(f) your health, which may be relevant if you request payment of your pension early on grounds of ill health;

and

(g) if you have used a pensions dashboard, an online platform where you can access information about your pension benefits, a "pensions identifier" which is a string of characters used to identify your specific benefits under the Scheme.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we use that information

The Trustee has a legitimate interest and legal obligation (see 'Lawful Bases' below)in holding and processing the above information about you as it is needed for us to administer the Scheme properly and to calculate, fund, secure and pay benefits. We also process and retain personal data:

- to comply with our obligations towards members under the Scheme's governing documents, as well as under relevant legislation; and
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes "matching", where we use personal data that a user

[1] We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals (as this may prevent us from being able to administer the Scheme properly).

has provided to search our Scheme records to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a "possible match".

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependents and beneficiaries (known as "sensitive personal data"). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

Information we may collect from other sources (such as your employer, HMRC, DWP, regulatory bodies and tracing organisations)

These are examples of categories of information we may collect from other sources:

(a) personal details (for example, your name, date of birth);
(b) your contact details (for example, your address, phone number and email address):
(c) information necessary to calculate and pay your contributions or benefits (for example, your employment history and salary).

Lawful bases

Our lawful bases for collecting or using your personal information for **legal requirements** are:

- **Legal obligation -**to fulfil our legal obligations (including any contractual obligations and obligations relating to complying with the requirements of Pensions Dashboards), which includes making sure that your benefits are paid correctly.

  The ways we use your information include:

  - identifying you and your survivors and updating your details as may be requested by you
  - communicating with you
  - calculating and paying your benefits or in relation to a transfer of your benefits
  - making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death
  - deciding how to invest contributions paid by you or your employer, if applicable
  - disclosing members' personal data to the Scheme's Pensions Dashboards provider.

- **Legitimate interest –** 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 the Scheme 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
    - Carry out 'employer led' exercises so that the Scheme's employers can contact you for their legitimate interests of explaining your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits, which tend to be called 'employer led' exercises.

When assessing whether a need to use personal information falls within a legitimate interest, the Trustee will generally assess whether your own interests, rights and freedoms under data protection laws are looked after when also considering the legitimate interest of the employer/third party in wanting to carry out the exercise. In this way the Trustee can protect your own rights under data protection laws.

Legitimate interest – In certain circumstances, the Trustee may also need to use the information held in relation to any legal claims.

How long we keep your personal data for

We will keep your personal information for as long as we need it in order to provide the benefits payable from the Scheme; this will be for the duration that you have benefits in the Scheme (whether payable at your retirement or to your survivors / beneficiaries after your death). We may then retain your personal data for a further period (up to 20 years), to take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to Pensions Dashboards, we will comply with that restriction.

Who we share your personal data with

We may share your personal information with:

(a) the Schemes' administrators and our advisers (such as the Scheme Actuary, benefit consultants, Scheme lawyers, etc) to facilitate the administration of the Schemes and your benefits;
(b) relevant public bodies, including His Majesty's Revenue and Customs ("HMRC") and other Government organisations, including the Pensions Regulator, the Pension Protection Fund, the Financial Conduct Authority, and the Information Commissioner's Office;
(c) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes
(d) third parties that form part of the "dashboard ecosystem" that enables Pensions Dashboards services to work, as well as the Scheme's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Scheme to be connected to the Dashboards ecosystem.

International transfer of your personal information

We may transfer and process your personal information outside of the UK. Where your personal information is to be transferred outside the UK (for example by the Scheme administrator to an approved sub-Processor) we will take reasonable steps to ensure that there are appropriate safeguards in place in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information (a data subject access request).

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you. To make a data subject access request, please contact us using the contact details at the top of this privacy notice.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your personal information after raising a complaint with us, you can also complain to the Information Commission.

The Information Commission's address:

Information Commission
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint