

July 2024

Dear Member

## Vedius Pension Trust (the “Scheme”)

### Appointment of an Independent Trustee

We are writing to let you know that Vidett Governance Services Limited (“Vidett”), has been appointed with effect from 19 April 2024 to act as the sole professional independent trustee to the Scheme. We have been appointed by an order of the Pensions Regulator (tPR) – a copy of this order is available on request.

### About us: Vidett – an Independent Trustee Company

Vidett is a professional trustee company with considerable experience of acting as an independent trustee to pension schemes. We act as trustee to over 450 pension schemes, ranging from small schemes to some of the largest schemes in the country, of all types (including defined contribution / money purchase arrangements like the Scheme). We have a team of over 125 professionals with experience of the pensions industry. We are on the Pension Regulator’s list of approved pension trustee companies, and are also on the trustee panel for the Pension Protection Fund.

### Our approach & position

Vidett is independent of all companies associated with the Scheme, and any investments within the Scheme: we have a duty to act in your best interests, as Scheme members. It is our responsibility to ensure that the Scheme is administered in accordance with the Trust Deed and Rules (the Scheme governing documentation), and run and governed in compliance with the requirements of UK pension legislation.

### Current status and next steps

Following our appointment we are working to obtain all the documents relevant to the current position of the Scheme, liaising with the current Scheme advisers where appropriate. We are working to have complete control of the Scheme’s investments and assets as soon as possible (which always takes some time).

As part of our information gathering exercise, we would be grateful if you could complete and return the attached Questionnaire with any relevant documents such as emails and letters to us in the enclosed SAE or email them to [Vedius@vidett.com](mailto:Vedius@vidett.com). Should you wish to speak to us, please call 0300 180 0167. This is to support us in our investigations and management of the Scheme.

We appreciate that previous communications to Scheme members have referenced litigation in relation to the Scheme. We are not yet in a position to comment on that litigation, as we are working to have a complete understanding of the history of the Scheme.

## Interaction with Aviva

If you have a policy with Aviva, you will continue to receive correspondence from them as Aviva continue to be responsible for that policy.

## Data protection

Please find attached a copy of the Scheme's privacy notice following our appointment.

We expect to write to members with updates on matters concerning the Scheme. To keep costs down we will only do so when there is meaningful information to provide.

If you have any queries regarding Vidett or our appointment to the Scheme, please do not hesitate contact me at the address below.

Please note that all payments from the Scheme (including payments on retirement and transfer values) have been put on hold, whilst we take control of the Scheme. Please bear with us whilst we gather all relevant information, but if you have any urgent queries, please contact:

Vidett  
Forbury Works  
37-43 Blagrove Street  
Reading  
Berks  
RG1 1PZ  
Telephone: 0845 313 0024

Email: [Vedius@Vidett.com](mailto:Vedius@Vidett.com)

Website: [www.vidett.com](http://www.vidett.com)

Yours sincerely



Louise Webb  
**Client Director**

Enc – Privacy Notice, Member Questionnaire

# VEDIUS PENSION TRUST (the “SCHEME”)

## Scheme privacy notice

This privacy notice tells you what to expect us to do with the personal information of our 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**”). In some circumstances it may also include the Scheme legal advisers who will process personal data to comply with their professional duties as advisers to the Trustee.

## Our contact details

**For details about the Scheme, please use the usual Scheme Client Team mailbox at: [Vedius@Vidett.com](mailto:Vedius@Vidett.com).**

**The contact details of our Data Protection Officer are:**

- **Address:** 3rd Floor Forbury Works, 37-43 Blagrove Street, Reading, RG1 1PZ
- **Telephone:** 0118 207 2900
- **Email:** [info@vidett.com](mailto: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 which Scheme members are entitled.

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 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 [Vedius@Vidett.com](mailto:Vedius@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<sup>1</sup>;
- (e) 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.

### 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), which includes making sure that your benefits are paid correctly.

The ways we use your information include:

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<sup>1</sup> 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).

- 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.
- **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 information

We will keep your personal information for at least as long as we have a relationship with you or your survivors. When deciding how long to keep your personal information after our relationship

with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

## Who we share information with

We may share 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.

## International transfer of 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) 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 ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

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

## Last updated

3 May 2024



# Vedius Pension Trust -Member Questionnaire

**Member Name:**

The purpose of this questionnaire is for you to set down how and why you transferred out of your original pension scheme and ended up in the Vedius Pension Trust.

There may have been more than one step; for example, you did not transfer directly from your original scheme but via one or more other pension arrangements. You should answer the questions fully, providing any additional explanation and as much information as possible.

For the Purposes of the questions below “Scheme” refers to the Vedius Pension Trust.

1. Please provide a history of how you transferred from your original pension scheme to the Scheme including the name of your original scheme and any other scheme or arrangement that you may have been a member of before becoming a member of the Vedius Pension Trust.

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If you transferred benefits from the Ploutos Pension Trust, then please also contact Dalriada Trustees Limited with details of these benefits at [ploutospensiontrust@dalriadatrustees.co.uk](mailto:ploutospensiontrust@dalriadatrustees.co.uk)

2. How did you first hear or find out about the Scheme?  
*(e.g. unsolicited (cold) call/ text message/ email/literature in post/advertisement/your own internet search)*

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3. Please provide contact details of the company or individual you spoke to originally.

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4. What service(s) did the company or individual offer you?  
*(e.g. pension review or advice/Investment review or opportunity/unlocking cash/cash bonus/tax savings)*

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5. What was it about the Scheme that influenced your decision to transfer?

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6. Did the company or individual you first spoke to process your transfer or was this done through a different company? Please provide details if you have them.

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7. Were you informed of how your funds would be invested? Or did you choose from a list of investments?

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If so, what specific investments (or type of investment) were you made aware of and by whom?

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8. Did anyone ask you what your attitude to investment risk was? If so, please provide details of who asked you and your response.

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9. How were the investments in the Scheme described to you?  
(e.g. *Low Risk/ Medium Risk/ High Risk / Risk not mentioned/ UK investments /Overseas investments/ Regulated investments/ Other*)

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10. Did anyone ask you about your investment knowledge/experience, or if you understood the investments offered? Please provide details.

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11. What were you told about the returns expected from the investments?

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12. Were you provided with any updates regarding the investments and how they performed? (Please provide copies if you have them)

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13. Did you take independent financial advice when joining the Scheme? If so, please provide details of your advisor and if they said they were regulated.

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14. Were you made aware of any charges for joining the Scheme and/or for making the subsequent investments and/or ongoing charges? If so, please provide details of what you were told about Scheme charges and by whom?

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15. Were you ever offered any cash payment to join the Scheme?

*(e.g. a pension commencement lump sum/other cash payment)*

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16. Did you ever receive a cash payment or other monetary incentive for joining the Scheme? If so, please provide details of the payment including who made the payment and the amount paid. Please also confirm if you were aged 55 years or older when you received the cash payment or incentive.

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17. Did you ever receive a loan from the Scheme or from any company connected to the Scheme? If so, please confirm the amount and terms of the loan

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18. Have you received an unauthorised payment charge from HMRC?

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19. Please provide any other information that you feel may help us in our investigation.

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**Declaration:**

I confirm the above information is true, accurate and complete to the best of my knowledge.

Full Name:

Your signature:

Date:

The address this letter has been sent to is correct: Yes/No (please circle whichever is correct)

If no, please provide your current address here:

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Please provide your contact email address, telephone numbers, mobile and/or landline:

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Please return this questionnaire and any documentation/communications you have to Vidett Governance Services Limited at Forbury Works, 37-43, Blagrove St, Reading RG1 1PZ in the enclosed SAE or email it to [Vedius@vidett.com](mailto:Vedius@vidett.com).