

St Dunstan's Retirement Benefits Plan (1973) - Privacy Notice

This Privacy Notice has been issued by the Scheme Actuary of the St Dunstan's Retirement Benefits Plan (1973) (the Plan) to comply with the General Data Protection Regulation (GDPR), which came into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controller

The Scheme Actuary to the Plan is Jon Worthington of Barnett Waddingham with effect from 31 December 2018.

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Scheme Actuary is considered a "data controller" (a holder, user and processor of personal data) for the purposes of the GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Plan's auditor or legal advisers.

The Scheme Actuary can be contacted as follows:

Barnett Waddingham
1st Floor
Royal Liver Building
Pier Head
Liverpool
L3 1HU
Email: BlindVeteransUK@Barnett-Waddingham.co.uk
Telephone: 0333 11 11 222

Use, transfer and storage of personal data

In the course of running the Plan, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Plan's administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Plan).
- Salary and data relating to investments and pension assets held outside of the Plan (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Plan).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the Scheme Actuary by your employer, the Plan's Trustees or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Plan. Your personal data will be stored until such time as it is no longer need it but in any event for not longer than 7 years after the date the Plan is wound up.

The Scheme Actuary shares your data with the Plan's administrator Barnett Waddingham, the Trustees, the sponsoring employer and AVC providers. They may also share data with the Trustees' other professional advisers (including the Plan Auditor), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Scheme Actuary can share your data with the employer for the purposes of providing information to the members about access to the pension freedoms (either via a one-off exercise or as a business as usual offering) or other incentive exercises (such as PIE).

Your data may be shared by the Plan's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Scheme Actuary's formal Data Mapping document, available on request in writing to the Scheme Actuary at the address above.

The Plan administrators and Scheme Actuary, on behalf of the Trustees, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustees' **legal obligation** to run the Plan in accordance with the Trust Deed and Rules. The Trustees and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustees' **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Plan
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(s) and their 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

The Scheme Actuary uses your personal data to advise the Trustees on the financial management of the Plan. This advice helps to ensure the Trustees are able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustees.

Your personal data will not be directly transferred to another country unless you request for this to be done.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the Scheme Actuary at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the Scheme Actuary is permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustees may not be able to perform their duties in relation to the Plan, and your benefits could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>.