

## **To the members of the 1Life Management Solutions Limited Pension Scheme General Data Protection Regulation Privacy Notice**

Data protection regulation is extremely important to ensure that personal information is kept securely and used only for the right purposes. The Trustee and our advisers have been complying with the current laws since they came into force in 1998.

From 25 May 2018 the law will be changing to tighten further the protection of personal data. This doesn't just apply to pension schemes; every company and organisation in Europe that has access to personal data will need to comply with the law.

Under the new laws one of the things we must do is to write formally to all the members of the pension scheme to explain how your personal data will be used, who will have access to it and what new rights you will have.

**The pension scheme member data that our advisers hold on our behalf is never sold to other organisations and is never used so that other organisations can sell you their products or services.**

### *Why is the Trustee writing to me?*

Under the regulations the trustee board are "Data Controllers". This means that we decide how and why your data is used and it is therefore the Trustee who needs to write to you. As Data Controller, the Trustee collects and process your personal data for the purposes of administering your pension benefits and carrying out related activities. In particular, we will use your data to:

- calculate your benefits;
- identify what benefits are, or might be, payable to you or, in the event of your death, any beneficiaries;
- deal with any queries or disputes you may have about your benefits;
- communicate with you by electronic means, including online, by post or by other means to keep you updated on matters related to the Scheme; and
- provide you with information about your benefits and options available to you.

### *Why do we use your personal data?*

Whenever we process your personal data we do so on the basis of a lawful justification. We will only use your data when it is necessary to comply with our legal obligations as Trustee (such as to pay your benefits when they fall due), if it is necessary to protect your interests (such as if we need to let you know about benefit options) or if it is in the legitimate interests

of the Trustee to use your data in that way, and in doing so, we are not breaching your rights (such as in any of the circumstances listed above).

We only will process sensitive data, such as health information, with your consent. You have the right to withdraw that consent at any time but please note that failure to provide consent, or withdrawal of your consent, could affect our ability to assess your entitlement to certain benefits. For example, without access to your medical information, the Trustee could not process a claim for ill-health early retirement. If you do withdraw consent, then that will not affect the lawful basis on which the data was processed prior to consent being withdrawn.

### *What is personal data?*

Personal data is information that could be used to identify you as an individual. The personal data we hold includes your name, National Insurance number, date of birth, gender, marital status, length of employment, salary details, home address and bank details. We may also hold information about your spouse or civil partner, dependants, or other potential beneficiaries, and we may hold sensitive personal information e.g. health information, membership of trade unions, race, religion or sexual orientation.

### *Who has access to my data?*

The administrators, First Actuarial, who look after your member records and calculate your benefits hold complete records of all the members of the Scheme. The Scheme Actuary needs access to some of that data in order to assess how well funded the Scheme is and sometimes in order to assist in calculating benefits. From time to time, other organisations will also need access to your data. For example the Scheme's Auditor will see a limited amount of personal data in order to ensure that the Scheme's finances are in order and the correct benefits are being paid out. The Scheme's legal advisor may need to be consulted on individual cases. If you are a pensioner we have to provide information to HMRC so that they know what tax has been deducted from your pension.

1Life Management Solutions Limited may also hold your data to comply with its legal obligations as the sponsoring employer of the Scheme. It also has a legitimate interest in the Scheme being run in a cost effective way and may have an interest in certain options available to members.

All of the organisations that need access to your personal data will have to comply with the new regulations. A full list of the organisations that we share your data with is available on request from the address shown at the end of this notice. Where these organisations are data controllers a copy of their Privacy Notice is available to you on request.

The Trustee is committed to ensuring that your personal information is secure. We have in place appropriate technical and contractual measures to ensure that information is only shared for the reasons, and by the means, set out in this notice.

The Trustee takes great care to ensure that your information is kept secure when we need to share this with a third party.

Where we have information in relation to proposed beneficiaries, who may become eligible to a benefit on a member's death, we will advise the individual of their data protection rights if a benefit becomes payable from the Scheme.

#### *How First Actuarial uses your information*

The current First Actuarial Scheme Actuary, Vicky Greenwood, and / or First Actuarial when providing defined benefits actuarial consulting services, are Data Controllers and so we share your personal information with First Actuarial in order for them to provide these services. The First Actuarial Privacy Information is available on request if you email [manchester.admin@firstactuarial.co.uk](mailto:manchester.admin@firstactuarial.co.uk).

#### *Processing your information outside the European Economic Area ("EEA")*

All countries within the EEA, including the UK, have similar standards for the protection of personal data. Where any of your information is transferred outside the EEA (for example, any of our advisers or service providers have IT systems located in other jurisdictions) we ensure that there are appropriate safeguards in place to ensure the security of personal data.

#### *What will you do with my personal data and how long will you keep it?*

The reason we hold individual member records (that contain personal data) is so that the correct pension benefits can be calculated when members retire and once retired, members continue to be paid the correct pension. The Trustee's advisers will need access to that information to ensure that everyone receives the correct pension and in the event of a member's death that dependants are also paid the correct benefit.

We will need to hold personal data for many years, probably until after any dependant's pension ceases (long after your own death). In practical terms, there are often occasions when a review of historical member information is necessary. One of the most recent examples of this is HMRC's decision to cease the practice of contracting out of the State Pension Scheme. In this case the Scheme administrators are looking back at records held up to 40 years ago to make sure that every member's contracted out record is correct and is in line with what HMRC hold.

### *What rights do I have?*

You already have the right to see your own pension scheme records (this is known as a Subject Access Request) and you can require that we rectify any errors in the data that we hold about you, but in addition, you will (under certain limited circumstances) have the right to be forgotten or have your personal information deleted. However, as far as the pension scheme is concerned, without your personal information the administrator would not be able to calculate your benefits.

For pension schemes there are legal and valid reasons why your data is kept and used for all the purposes associated with managing a pension scheme. If you are asked to provide consent (to agree that another organisation can have access to your data, or for us to use especially sensitive information such as information about your health) then you have the right to withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

If you are unhappy with the way your data has been used you can complain to the Information Commissioner's Office (ICO). Their address is shown below:

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 (if you prefer to use a national rate number)

### *What changes will I see?*

As we explained at the start of this letter, the Trustee and our advisers have been complying with the Data Protection laws since 1998 and you will therefore only see minimal changes to the wording on letters and information that are usually sent to you in the normal course of events such as at retirement or upon leaving the Scheme.

In future, when there are significant changes to the pension scheme (or projects) that require us to use your personal data we will explain in more detail why it is being used and whether you need to consent to that particular use of your data.

### **Contact details**

**Your benefits are not affected and you do not need to take any action as a result of receiving this letter. However, if you have any questions the Trustee can be contacted via the Scheme administrator using the following contact details:**

Declan Boyle, First Actuarial LLP, Trafford House, Chester Road, Manchester M32 0RS

Email [declan.boyle@firstactuarial.co.uk](mailto:declan.boyle@firstactuarial.co.uk)