

Privacy Notice

Purpose

The purpose of this document is to outline what the Trustee of the Scheme does with your data and who else processes your data on behalf of the Trustee.

If you want to know more about the information held by the Trustee, the purposes for which it is held or about the Scheme's data protection arrangements please contact the Scheme's Administrator.

This document should be read alongside the Introduction, glossary and roles document for any definitions or references of firms or individuals who provide services to the Scheme.

This document will be reviewed regularly to ensure it remains accurate, or when updates are required. The document is effective from the date below and replaces previous versions of the document.

Date adopted: 1 September 2024

Date last reviewed: 1 April 2025

Date of next review¹: 1 April 2026

1 unless there is a relevant change in circumstance which requires an earlier review

On behalf of the Trustee of the Kendall Cross (Holdings) Limited Pension And Assurance Scheme

PRIVACY NOTICE

As the Trustee of the Scheme, we collect, hold and process personal data about Scheme members and beneficiaries to comply with our legal duties to run the Scheme. In our capacity as a data controller, we also comply with relevant data protection legislation.

This notice is to give you information about the data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it.

What personal data we hold

The data we hold is to assist us in calculating and paying the benefits members are entitled to, and this includes your name, address, salary, years of service in the Scheme, date of birth, NI number and contact details. This is not an exhaustive list and we may, from time to time, hold other personal data in order to administer and manage the Scheme.

We also hold some special categories or "sensitive" data about you for the purposes of administering the Scheme (for example in relation to ill-health or death benefits, or under the Scheme's Internal Dispute Resolution Procedure). We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

How we obtain your data

Whilst much of the data we hold has been provided by you, we also hold and process data provided by the Scheme's sponsoring employer (the "Company"), other schemes from which members have transferred, HMRC, the Department for Work and Pensions and regulatory bodies and by tracing organisations. We also receive information from you about your proposed beneficiaries, who may be eligible to receive benefits in the event of your death. Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, we assume that you have the consent of those individuals to provide us with this information. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the scheme, so please ensure that those individuals are aware of the information contained within this notice.

What we do with your data

We use this data to deal with all matters relating to the Scheme including processing your personal data for other legitimate purposes relating to the operation of the Scheme, for example to:

- contact you with details of your benefits
- ensure that the Scheme is funded for appropriately
- properly manage the Scheme's investments
- improve the accuracy of the Scheme's valuation assumptions
- manage the Scheme liabilities including entering into appropriate insurance arrangements

Who else processes your data?

We share your personal data with certain third parties who help us run the Scheme. They include:

- The Scheme's Administrator
- The Scheme Actuary and wider Actuarial team
- The Scheme's Legal Advisers
- The Scheme's Auditors

Where applicable, we also share data with life assurance providers, AVC providers, insurance providers, insurance companies, medical advisers, annuity and insurance brokers, tracing organisations. In each case, we will only do this to the extent that we consider the information is reasonably required for these purposes.

In some circumstances we are joint controllers with the Scheme Actuary and our legal advisers (who will process personal data to comply with their professional duties as advisers to the Trustee) and the Company. The Company holds personal data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in understanding its liabilities to the Scheme. The Trustee will therefore share relevant information with the Company and its auditors and advisers for this purpose.

We may also provide your data to government bodies and dispute resolution and law enforcement organisations, including the Police, the Pensions Regulator and the Pensions Ombudsman. They may then use the data to carry out their legal functions.

From time to time the Trustee, the Company and other advisers may transfer personal data to other countries, including outside the UK and the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

Storage and deletion of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. We will therefore retain information relating to you until your membership of the Scheme ends and for so long afterwards where we consider it appropriate to deal with any queries relating to your benefits which may arise after that time.

In practice, normally this means that your personal data may be retained for up to a period of 15 years after your benefits (or your beneficiary's) stop being paid.

Your rights

You have the right to access your personal data and, require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you may 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 to which you are entitled.

What if you have a complaint?

To make a complaint about how we've handled your information, please contact us as set out above.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. This is in addition to and separate from the Scheme's internal dispute resolution procedure. Its contact details are:

Address:

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

Telephone number:

0303 123 1113 or
01625 545 745

The Trustee reserves it right to amend this privacy notice from time to time.