

## Northgate HR Pension Scheme

### PRIVACY NOTICE

#### *Our role*

We, as trustees of the pension scheme, hold data related to your membership of the Scheme.

You may have provided some of your data directly to us. Other elements of the data we hold about you may have been provided to us by your employer. We may also collect additional data from you at certain key points (for example, when you retire and draw any pension that you may be entitled to).

As we hold this data, this means that we are a 'data controller'.

As data controller, there are a number of points which we are required to bring to your attention. These relate to the legal basis upon which we are entitled to process your data, how long we keep your data for, what we do with your data and your rights.

#### *Basis for processing*

As data controller, we ask various people to process the data we hold to allow us to administer your benefits under the Scheme and pay pensions. Processing includes actions such as recording, organising and storing data.

Our processing of your data is justified because, given our duties as trustees (including, for example, our duty to act in the best interests of our scheme members and to administer benefits properly), we have a legitimate interest in processing your data.

The processing is also necessary for compliance with the legal obligations we are under in relation to running the pension scheme and paying benefits to you.

Finally, in some cases, you may also have given explicit consent for us to process your data for the purposes of us administering the pension scheme.

#### *What do we do with your data?*

As data controller, we use third parties to process your data.

Those third parties currently include the Scheme's actuary, administrator, legal adviser, investment consultants. If you would like a list of the names of the third parties who currently fulfil these roles, this can be requested by writing to The Secretary to the Trustee, Zellis Pension Trustees Limited, First Actuarial LLP, First House, Minerva Business Park, Lynch Wood, Peterborough, PE2 6FT.

In certain circumstances, we may also be required to share your personal data with other parties because a court or a law enforcement agency has asked us to do so. This could include sharing information with, for example, the police, the Pensions Regulator or HM Revenue and Customs.

### *How long do we keep your data for?*

We will normally keep your data for at least as long as you are a member of the pension scheme.

If you cease to be a member of the pension scheme (for example, if you transfer all of your benefits out of the pension scheme), we will then assess the length of the period for which we need to retain your data. As pensions are long term benefits, it may make sense for us to retain your data for some time after you have ceased to be a member of the pension scheme just in case, for example, there are any queries about your benefits in the future.

However, we would keep the length of time for which we retain your data under review. We would also cease to hold your data at any point where it became unreasonable for us to retain it.

### *Your rights*

We are required to let you know that you can request erasure of personal data or a restriction on our processing of it. In addition, you can object to us processing your data, and you also have a right to obtain and reuse your data for your own purposes. Where we are relying on consent to process your data, you also have the right to withdraw that consent.

However, because we need your data to be able to calculate and pay your benefits, we do not expect that the sort of requests mentioned in the above paragraph are requests that our members will want or need to make.

You have a right to request access to your data. If you make such a request, we will respond to it as soon as we can and, in any event, within three months. If, once you review the data that we hold, you notice that there are mistakes in any of that data, you can also ask us to rectify that data.

You also have the right to lodge a complaint in relation to the way we deal with your data. In the first instance, we would always suggest that you take this up with us first. However, you can also complain directly to the Information Commissioner's Office. The Information Commissioner's Office is the UK's independent body set up to uphold information rights and its contact details can be found on its website: <https://ico.org.uk>. You can also call its helpline on 0303 123 1113.

### *Contact details*

If you would like to contact us about your data or have any queries in relation to the information set out above, you can do so directly using the following contact details: The Secretary to the Trustee, Zellis Pension Trustees Limited, First Actuarial LLP, First House, Minerva Business Park, Lynch Wood, Peterborough, PE2 6FT.