

Scottish & Newcastle Pension Plan Trustee Limited

PRIVACY NOTICE FOR THE SCOTTISH & NEWCASTLE PENSION PLAN (the “Plan”)

Scottish & Newcastle Pension Plan Trustee Limited (the “**Trustee**”), as the trustee of the Plan, holds and processes personal data about Plan members and beneficiaries in order to run the Plan. In doing so, we comply with relevant data protection legislation.

What do we do with your data?

As a data controller, the Trustee collects and processes your personal data for the purposes of administering the Plan, which includes: the calculation, administration and payment of benefits under the Plan before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, investment of the Plan’s assets, dealing with any queries or complaints regarding decisions that we have made or your benefit entitlements, and compliance with legal and regulatory governance obligations. The legal basis for doing so is in order for the Trustee to comply with its legal obligations, and other legitimate interests, such as the efficient management of the Plan, and providing certain options to members.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by Heineken UK Limited, Scottish & Newcastle Limited, (the “**Companies**”), other former participating employers in the Plan, from other pension schemes that you have transferred in from, from HMRC, the DWP, regulatory bodies and from tracing organisations.

We also receive information from members about their proposed beneficiaries who may be eligible to receive benefits on the member’s death. This data may include their name, date of birth, address, and relationship to you. 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.

The data we hold is to assist the Trustee in calculating and paying the benefits the members are entitled to, and this includes (but is not limited to): your full name, address, years of service with the Plan, date of birth, NI number and contact details, including telephone number, mobile number and/or email address, passport number or other governmental identification number, financial information such as salary, bank account details, and pension entitlement, details of your spouse and/or dependants, marital status, employment/ retirement status, job band, bonuses and benefits, and start date and leave date with the relevant employers and the Plan.

We also hold some special categories or “sensitive” data about individuals for the purposes of administering the Plan (for example in relation to ill-health or death benefits). We will in most circumstances process this data as necessary for the purposes of establishing, exercising or defending legal claims 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.

Who else processes your data?

We share your personal data with certain third parties involved in running the Plan, for example, the Plan’s Administrator (who may record inbound and outbound calls to and from the Plan Administrator’s helpline), the Plan’s Actuary, the Trustee’s legal advisers, insurers, the Plan’s auditor, tracing organisations, additional voluntary contribution providers, printers, the Plan’s bank account provider the Companies, the Companies’ advisers, and other regulatory bodies, for example HMRC, the Pensions Ombudsman, the Pensions Regulator and the Pensions Advisory Service. A complete list of the Plan’s third party advisers is listed in the Plan’s Annual Report and Accounts.

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In some circumstances we are joint controllers with the Plan's Actuary, the Trustee's legal advisers (who may process your data to comply with their professional duties as advisors to the Trustee), the Plan's Administrator (who may process your data where necessary for the purposes of its legitimate interests and/or in defence of legal claims) and the Companies. The Companies, and other group companies hold your data to comply with the legal obligations of the sponsoring employers of the Plan. The Companies and other employers have legitimate interest in the Plan being run properly and effectively, and may have a legitimate interest in processing your data to provide certain options to members. The Trustee may share information with the employers, their auditors and other third party advisers for this purpose.

Your personal data may also be released to third parties if authorised by you, or as required by law, or to comply with a judicial processing, court order, request from the Pensions Regulator, the Pensions Ombudsman, or any other regulator or any other legal process served on or involving the Trustee.

From time to time where this will assist, your data may be processed in other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure appropriate safeguards will be put in place.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Plan is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Plan ends.

Once your membership ends, we will decide whether to delete some of the data held in relation to you after 6 years. However, information will be held by the Trustee for longer where we consider it appropriate in order to ensure the Plan pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

The Plan's Administrator (as stated in the Plan's latest report and accounts) will hold on to your personal data for 7 years after the termination of the contract with us unless otherwise required to comply with any applicable laws and/or regulations. This is to protect themselves against any subsequent legal claims.

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. You can also require that we restrict the way we process your personal data or object to its processing. In some circumstances, you have a right to request a copy of your personal data for the purposes of transmitting elsewhere. The Trustee is only obliged to permit portability in circumstances where they have obtained consent or are relying on a contractual obligation. You can exercise your rights by contacting the Plan's Administrator on: snpensions@capita.co.uk. Please notify us as soon as possible if there has been a change in your details (for example if your personal circumstances such as your nominated beneficiary or home address change).

Where we have requested and obtained your consent to process particular information, you are able to withdraw that consent at any time. However if we do not hold all the data we need to administer your benefits, we will not be able to pay out the benefits you are entitled to.

Scottish & Newcastle Pension Plan Trustee Limited

Contact details

If you have any questions about how we process your personal data you can contact any of the data controllers listed above via the Trustee as follows:

Scottish & Newcastle Pension Plan Trustee Limited, c/o Scottish & Newcastle Pension Plan, Capita, PO Box 555, Stead House, Darlington 9YT.

Telephone Number: 0345 600 2086

Email address: snpensions@capita.co.uk

What if you have a complaint?

To make a complaint about how we've handled your information, please contact the Trustee using the details 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 Plan's internal dispute resolution policy.

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

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