

# **UBM Pension Scheme Privacy Statement**

## **Introduction**

As the Trustee of the UBM Pension Scheme (the Scheme) we (UBM Trustees Limited) hold certain personal information (known as “personal data”) about Scheme members and, where applicable, their dependants and beneficiaries. Most of the data held and processed by the Trustee in running the Scheme will be personal data as it is information from which you, as an individual, can be identified.

We are committed to protecting your privacy and other rights under the data protection legislation, including the UK GDPR and the Data Protection Act 2018. We are "data controllers" for the purpose of the legislation. This statement explains how we may collect, use and share your personal data.

## **Why do we need to collect information about you?**

We need information about you so that we can run the Scheme properly. We need to know who you are, how old you are and what your benefits in the Scheme are so that we can pay out the correct amounts to you. We need to know where you live so that we can get in touch with you with information about your benefits, and so we can check that you are still alive if we are paying you a pension. We need to know about your dependants so that we can check if there’s anything payable to them when you die.

We are unable to run the Scheme without this information. We have a legitimate interest in holding and using your personal data to ensure the proper administration of the Scheme. We also need to process and in some cases share your personal data in order for us to comply with our legal obligations as trustee of the Scheme (such as paying you the benefits to which you are entitled under the Scheme, or complying with our own statutory obligations).

In some limited circumstances, we will only collect and use certain types of sensitive personal data (see below) with your express consent. We will make clear to you when your consent is needed.

If we are not provided with the personal data about you that we need, it may not be possible for us to provide some or all of the benefits that would otherwise be payable to or in respect of you from the Scheme.

## **Information we may collect about you**

We may collect and process personal data which you, your employer or third parties provide to us in connection with the Scheme. This may include your contact details; your date of birth, sex, and marital (or relationship) status; information about your contributions to and choices made under the Scheme; information about your employment, salary and benefit rights; evidence of your identity (e.g. national insurance number or passport details); information about your family members and dependants; and (where benefits are payable to you) your bank details.

We may also need to collect and process some particularly sensitive information about you and/or your dependants and beneficiaries. This is known in law as “sensitive personal data” and includes information that relates to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations. We will only collect any sensitive personal data from you when it is needed, for example information about your health if you apply to receive your benefits on the grounds of ill health.

## **How do we collect and hold information about you?**

Most of the personal data we hold will have been provided to us by you when you joined the Scheme or when you have contacted us or the Scheme administrator about your benefits.

Other information about you may be provided to us by the Scheme's employer (or by employers who previously participated in the Scheme), other pension schemes and pension providers, independent financial providers, medical practitioners, other advisers or parties who provide services to us, and HM Revenue & Customs. Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

## **Who do we share the information with?**

Where we consider it necessary for the purposes explained above, your personal data may be shared with selected third parties. For example, we may need to share information with others in order to provide you with benefits under the Scheme, or to enable us to meet our contractual and other legal obligations.

The parties with whom we share personal data may include the following:

- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee;
- the employer to the Scheme (i.e. the company that employed you while you were an active member of the Scheme) and other companies in the group;
- the Scheme's professional advisers, including the auditors, actuarial advisers, investment advisers and lawyers, and other advisers we may appoint to carry out work (including audit work) relating to Scheme data and benefits;
- insurers, reinsurers and annuity brokers;
- healthcare practitioners;
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities;
- the advisers and printers who help us to provide you with various communications (including this one);
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions; and
- tracing agencies who assist the Trustee with updating scheme data.

We can allow your personal data to be transferred outside the United Kingdom if:

- the country to which your personal data is being transferred has been confirmed by the UK Government to provide adequate protection for personal data;
- the entity that is holding your personal data has entered into a written contract or some other form of data transfer mechanism, in each case approved by the UK Government, which requires it to provide all protections to your personal data required by data protection legislation; or
- the consent of the relevant data subject has been obtained.

Further information about transfers of personal data outside the United Kingdom can be obtained by contacting us using the contact details below.

The Trustee will only share the essential data that is needed by those organisations and only in ways that meet industry-standard measures for the security of any data that we do share, or otherwise as we are required to do so by law.

We will also share personal data with the actuary to the Scheme. The actuary to the Scheme is an independent data controller, alongside the Trustee, who will use your personal data for the purpose of assessing financial matters affecting the Scheme. The current actuary to the Scheme is Jack Sharman of Barnett Waddingham LLP, whose address is 2 London Wall Place, London, EC2Y 5AU.

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

We must keep all personal data safe and only hold it for as long as reasonably necessary to determine the benefit entitlements of you and your dependants from the Scheme and to comply with our legal obligations in relation to the administration of the Scheme. To comply with UK tax and pensions law, we must keep certain personal data for a minimum of 6 years (such as name, address, date of joining the Scheme and benefit details). But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life and after your death so that we have the information we need to pay benefits to you and/or your dependants and to answer queries relating to your benefits.

We review the personal data held in relation to the Scheme periodically in accordance with our data protection policy as it applies from time to time. If we conclude that certain personal data is no longer needed, that personal data will be securely destroyed.

### **Your rights**

You have rights under the data protection legislation, including:

- The right to see personal data that is held about you and to have a copy provided to you, or someone else on your behalf.
- If you believe that the personal data we hold about you is inaccurate, you can request to have it corrected.
- You can instruct the Trustee to restrict the processing of your personal data in certain circumstances, for example, whilst an accuracy issue is being resolved.
- You can request that certain types of personal data held about you is sent to you or another organisation in a format that can be read by computer.
- You can object to your personal data being processed, although the Trustee can override this objection in specific instances.
- Where the processing of your personal data is based on your consent, you can withdraw that consent at any time by notifying us.
- You can request that your personal data is deleted altogether.

You should be aware that taking any of the above steps could affect the payment of your benefits and/or our ability to answer questions relating to your benefits.

**Who to contact about your personal data**

If you wish to see your personal data, exercise any of your rights mentioned above, make a complaint about how we have handled your personal data, or make any other enquiries about how we use your personal data, please contact:

UBM Trustees Limited

5 Howick Place

London SW1P 1WG

ubm@capita.co.uk

**Making a complaint to the Information Commissioner's Office**

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Tel: 0303 123 1113 or 01625 545 745

Email: casework@ico.org.uk

**Changes to this privacy statement**

This statement is subject to regular review and may be updated from time to time. We will tell you if we make any changes to how we use your personal data.