

Data Protection Notice

What data is collected by the Trustee?

As a member of the Belron - UK Pension Plan the Trustees require a range of information to manage your benefits. This includes your name (and any previous names); gender; address; date of birth; national insurance number; marital status; business/ personal e-mail address; employee number; date of employment and remuneration details. Your employer will supply (or will already have supplied) these details to the Trustees. Upon retirement you may be asked to provide your birth certificate or passport and (if relevant) marriage certificate to verify the information given, of which copies will be made and retained.

If you complete an Expression of Wish Form, you may be providing details of your spouse or partner, children, family members or friends. These details will be held on file and only used in the event of your death. If you make changes to the Expression of Wish Form during your membership, the earlier form will be destroyed.

On what basis does the Trustee hold the data?

With regard to all of this information, the Trustee is regarded as the “data controller” and it has a legitimate interest in holding and processing the data. Why legitimate interest rather than consent? The Trustee has to have all of this information so that it can maintain proper records and therefore be able to pay your correct benefits to you at the appropriate time. Consent, on the other hand, can be withdrawn and, if this was done, the Trustee would be unable to pay your benefits.

Where you provide details of a child or children under the age of 16 you are consenting to the Trustee holding that data.

Having said this, certain data is regarded as sensitive, such as medical information which could become relevant in the event of any application for retirement on grounds of ill-health. In this circumstance, the Trustee would seek your consent to access your medical records. (Data such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership is also regarded as sensitive, but is highly unlikely to be relevant in the context of the Pension Plan).

What if there are errors in the data?

Data Protection legislation gives you a variety of rights which includes the ability to ask that incorrect or inaccurate data be corrected. The Trustee would be very grateful for you to exercise this right should you discover that any data held about you is inaccurate. Where you do ask for data to be corrected, the Trustee will ask you to provide supporting documentation. Legislation also gives you the right to be “forgotten”, however the Trustee would be unlikely to agree to such a request as this would make it impossible to pay your benefits to you.

What does the Trustee do with my data?

The Trustee will provide your data to an external administrator, known as a “data processor”. As the name suggests, they will process the data on behalf of the Trustee. In doing this, they will build up a picture, over time, of the history of your membership of the Pension Plan. They will perform calculations, as necessary, to provide you with benefit statements, transfer quotations, etc. and, ultimately, your pension. The Trustee may change the administrator from time to time. Details of the current administrators are shown below.

The Trustee may provide your data to other external advisors, for example an external actuary, solicitor, auditor, broker or insurer if it is necessary to carry out more detailed analysis or calculations with respect to your benefits. Our actuaries, XPS Pensions Limited, including our individual Scheme Actuary, are classed as joint data controllers with the Trustee when providing certain actuarial and consultancy services. XPS Pensions Limited has an appointed Data Protection Officer tasked with ensuring its compliance with data protection legislation. Your point of contact for XPS Pensions Limited or the Scheme Actuary is set out in the Who’s Who below.

With regard to sensitive personal information, the Trustee may disclose details to medical or occupational health advisers but, as indicated above, your consent will have been sought before this happens.

How long will my data be kept for?

Your data will be held for as long as is necessary to ensure that all of your benefits are paid appropriately. This may of course be for a very long time. Your data may be required even after you die if there are benefits payable to a spouse or partner or to children (although this notice will then apply to those individuals).

What rights do I have in respect of the data?

As mentioned above, you have the right to correct inaccuracies in the data. If it is shown that data is inaccurate, you have the right to ask that no further processing take place until the data is corrected. You also have the right to ask what information is being held about you, by whom it is being processed and for what purpose.

Should you have any concerns about the data being held or the manner in which it is being processed, or if you feel that your rights are being affected adversely, you have the right to complain to the Information Commissioners Office.

Who's who?

<p>The Trustee</p>	<p>Administrators - Final Earnings Section & Retirement Capital Section</p>
<p>Belron - UK Pension Plan Trustees Limited 1 Priory Business Park Cardington Bedford MK44 3US</p> <p>Pensions@BelronUK.com</p>	<p>XPS Administration Albion Fishponds Road Wokingham Berkshire RG41 2QE</p> <p>0118 313 0948</p>
<p>Actuary</p>	<p>Solicitor</p>
<p>XPS Pensions Limited Data Protection Officer Tempus Court Onslow Street Guildford GU1 4SS</p> <p>01483 330100</p>	<p>Gowling WLP Two Snowhill Birmingham B4 6WR</p> <p>0370 903 1000</p>
<p>Broker</p>	<p>Auditor</p>
<p>Howden Employee Benefits & Wellbeing 5th Floor 80 Leadenhall Street London EC3A 3DH</p> <p>020 3327 5700</p>	<p>Ernst & Young LLP 100 Barbirolli Square Manchester M2 3EY</p> <p>0161 333 3000</p>
<p>Insurer</p>	<p>Information Commissioner's Office</p>
<p>Aviva Life Group Risk Norwich NR1 3ZF</p> <p>01603 622200</p>	<p>Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>0303 123 1113 https://ico.org.uk</p>