

Bic UK Pension Scheme

General Data Protection Regulation (GDPR)

Privacy Notice

The General Data Protection Regulation (GDPR) requires organisations to be more transparent and accountable to individuals about how it manages and controls their data. This Privacy Notice, sets out how the Bic UK Pension Scheme ('the Scheme') manages its members' data, including who it shares data with and for what purposes it is used.

The Trustees of the Scheme are the ultimate data controller. The Scheme Actuary who is employed by Atkin & Co is a joint data controller. Other advisers and service providers to the Scheme act as data processors (or where relevant data controllers) and will process data in accordance with their own policies.

Purposes for which data is held and used

Information on Scheme members is held to allow Atkin & Co to pay pension and death benefits in line with Scheme rules and overriding pension legislation. Each individual is a 'data subject' who has rights in relation to the data held by the Trustees as data controller and the data processors. The purposes include, but are not limited to:

- a. Writing, calling or sending e-mails to members with information concerning their benefits or the pension scheme.
- b. Calculating and paying pensions at normal, late or early retirement.
- c. Calculation and payment of trivial commutation and small lump sum benefits.
- d. Calculating and paying death benefits.
- e. Calculating and settling transfer payments.
- f. Calculating and adjusting benefits in relation to divorce proceedings.
- g. Answering member queries or those of their professional advisers.
- h. Calculating and paying pension increases.
- i. Providing data to the Scheme Actuary for actuarial purposes such as triennial valuations, transfer values and insufficiency reports.
- j. Preparation of annual scheme accounts and provision of information to the Scheme auditor.
- k. Correspondence with government agencies, local government agencies and official bodies, including HM Revenue & Customs, the Department for Work and Pensions, National Insurance Contributions Office, the Pensions Regulator and the Pensions Ombudsman.
- l. Using tracing agencies where contact with members or beneficiaries has been lost.
- m. Carrying out mortality screening to check if pensioners are still alive.

Categories of Personal Data Processed

For the purposes of operating the pension scheme the following items of data may be held and processed:

- Personal details such as your name, gender, date of birth, national insurance number, address, telephone numbers, email address.
- Employment information such as service dates, salary information.
- Other financial information such as income tax information, bank account details, other, earnings details, protections relating to your pension.
- Data may also be held about next of kin and dependents for the purposes of paying spouse's, civil partner or dependent's pensions as required by the rules of the Scheme.

We may from time to time also need to process your personal data which is deemed by law to be sensitive and requires a further level of protection. In most cases sensitive data will only be required where a request for ill-health retirement benefits is made under the rules of the Scheme. Such data would only be used to satisfy the requirements of HM Revenue & Customs and the Scheme rules.

You should ensure that such sensitive personal data and information is only provided where it is absolutely necessary and in circumstances where there would be a need for us to process this in the provision of our services to you.

The data held comes from either the Sponsoring Employer of the Scheme, or information you have provided to the Trustees either directly or via one of their service providers. Some information may come from other third parties such as HMRC.

Basis of processing data

There are a number of legal bases for processing data under GDPR, the following are relevant for processing the data of Scheme members.

- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary to protect the vital interests of a data subject or another person.
- Processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

Updating member data

It is important that the data held for each data subject is accurate and up to date. Members may notify us of changes in their circumstances (marriage, divorce, change of address etc.). All notices relating to such changes must be made in writing to Atkin & Co or the Trustees and provide the members name, date of birth, address and national insurance number. All notices should be signed by the member. Notices concerning changes in name or marital status will need to include the original certificate as evidence of the change (marriage certificate, deed poll, decree absolute etc.)

Sensitive data

Sensitive data relates to information concerning a person's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences. The only sensitive data that the Trustees and their data processors may seek to collect will be related to a person's health and/or medical condition if a request is made for ill-health retirement under the rules of a particular pension scheme. Such data would only be used to satisfy the requirements of HM Revenue & Customs and Scheme rules in relation to providing ill-health benefits.

Apart from cases as noted above where a person's medical information may be required, the Trustees and their data processors will not intentionally or systematically seek to collect, store or otherwise use

information classed as 'sensitive personal data' We cannot prevent members or their advisers from disclosing this information as part of their correspondence with us. Members should ensure that such information is only provided where it is absolutely necessary and in circumstances where they would be content for us to use it. Where members provide sensitive data they will be asked to provide their consent to the processing of such data. There are circumstances where other legal bases can be relied on by the Trustees to process sensitive personal data such as where it is necessary to protect the vital interests of the data subject.

Rectifying data errors

If any data held is proved to be incorrect we will change it. Documentary evidence that confirms the correct details will be required before data is changed for example original payslips, P60s/P45s, letters from HMRC or government agencies, birth, marriage and death certificates.

Requests for copies of data

We will provide you with a copy of the personal (and where applicable sensitive personal data) we hold about you on written request.

In most cases, copies of requested personal data will be provided within one calendar month of a request being made (via post, telephone call or e-mail) from you. For security purposes, data will be issued via postal delivery to the member's home address.

Before any data is issued, Atkin & Co will require proof of identity from the data subject to reduce the risk of personal data being sent to a third party who is not entitled to it. If a request for data is made via a third party, such as a solicitor or independent financial adviser, Atkin & Co will require an original letter of authority as well as proof of identity from the data subject.

You may ask us to transfer a copy of your information to another service provider or third party, where technically feasible.

Where a request for data is complex, for example Atkin & Co needs to take specialist legal advice, an additional period of up to two months may be allowed to comply with your request. Where a data request is complex, we will write to notify you of this within one month of your original data request.

How long we keep your information

We will retain your information for as long as required for the purposes set out above or as required by applicable law. Even where you are no longer a member of the Scheme or your benefits have been brought into payment, we will continue to keep your information. We will do this for as long as we are allowed to in order to ensure that we can operate the Scheme properly, for our legitimate purposes and for other legal and regulatory reasons.

Holding data when processing no longer takes place

If you no longer wish the Trustees to process or store your personal data then you must make a request in writing to the Trustees.

On receipt of a request from the data controller Atkin & Co as the data processor will delete your personal data permanently and certify this to the data controller who made the request and to you directly if you have asked the data controller to do this.

You should be aware that deleting your data will mean that the Trustees are unable to fulfil their obligations in terms of any benefits you are entitled to. If the Trustees are unable to consent to your request for your data to be deleted they will confirm the reasons to you in writing.

Sharing data with other parties

The Trustees and their data processors may share your information with others in limited circumstances connected to the vital interests of the members and the purposes of the pension scheme. We may need to disclose member information if required by law. We will not seek to share

your information, other than for the purposes related to the operation of the pension scheme and the vital interests of the members, without taking steps to obtain your consent. If we are unable to obtain instructions, we may share information where we believe it is in your legitimate interests for us to do so. We will seek at all times to ensure that your information is shared in a secure manner. Whilst we will make best efforts to protect your information, we cannot guarantee the security of data transmitted by website, e-mail, post or phone. We have strict procedures in place to uphold the security of information and will continue to monitor and develop the protection provided over time. The parties with whom data may be shared include:

- The sponsoring employer of the pension scheme;
- The pension scheme's actuary;
- The pension scheme's administrator;
- The pension scheme's auditor;
- The pension scheme's legal adviser;
- The pension scheme's investment manager;
- Covenant advisers who assess the financial strength of the sponsoring employer;
- Insurance companies (where benefits are secured or insured with an insurance company);
- HM Revenue & Customs;
- The Department for Work & Pensions;
- The Pensions Regulator;
- The Pensions Ombudsman (where members have raised complaints);
- The Pensions Advisory Service (where members have approached them for guidance);
- Tracing and mortality screening agencies;
- Any other party with whom we are required by law to share your data.

Direct marketing

Data is held for the purposes highlighted above. The Trustees and their data processors do not use pension scheme or member data for purposes of direct marketing and does not provide it to any other party for such purposes.

Transferring data outside of the United Kingdom

In most cases, data will not be transferred outside of the UK. If data is transferred outside of the European Economic Area (EEA) this will only be completed where your data controller has provided us with authority and consent to do so and has informed you of the transfer. We will ensure that any such transfer is legitimate and in accordance with data protection legislation. The information sent as part of such a transfer will be minimised to the greatest extent possible.

Automated decision making and profiling

No significant decisions are made about individuals by wholly automated means. The Trustees and their processors do not carry out 'profiling' which is automated processing intended to evaluate certain personal aspects of an individual (for example, health, location or economic situation).

Queries and Complaints

If any member has concerns about the data that is held on them or the way that it has been stored or transferred they should contact the Trustees or Atkin & Co directly using the contact details given below. Atkin & Co are registered as data processors with the Information Commissioner's Office (ICO). Any member that has concerns about the way in which the data controller or data processors have handled your personal information may contact the ICO directly. The ICO's website can be found at <https://ico.org.uk/> Their telephone number is 0303 123 1113.

Contact Details for Atkin & Co

Atkin & Co
Nelson House
Central Boulevard
Blythe Valley Park
Solihull
B90 8BG

Contact Details for the Trustees

The Trustees of the Bic UK Pension Scheme
C/o Bic UK Limited
Chaplin House
Widewater Place
Harefield
Uxbridge
UB9 6NS

**Issued for and on behalf of the Trustees of the Bic UK Pension Scheme
May 2018**

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