

GEMS SENSORS PENSION PLAN (THE “SCHEME”)

PRIVACY NOTICE

You are currently a member or beneficiary of the Scheme, and the trustee of the Scheme (the “**Trustee**”) holds personal data in respect of you. The Trustee is considered to be a “controller” in respect of that data, which means that it is ultimately responsible for ensuring that it is kept secure, and is not processed for unlawful purposes.

In some circumstances the Scheme actuary, David Broadbent of Buck (the “**Scheme Actuary**”), and Buck will also be controllers in relation to the personal data you have provided. The role of the Scheme Actuary is to assist the Trustee in determining the funding required by the Scheme and also to assist the Trustee by calculating certain member benefits.

This notice has been prepared by the Trustee, the Scheme Actuary and Buck, together the controllers (“**us**”/“**we**”), and sets out the purposes for which we hold your data, and your rights in respect of that data.

Please note, the current Plan Trustee is PAN Trustees UK LLP (“**PAN**”) an Independent Trustee. PAN may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Plan. Information about PAN’s approach in this situation to data security as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>.

Why do we hold your personal data?

We hold your personal data in order to effectively administer the Scheme. We have a legitimate interest to hold your personal data to:

- pay the correct benefits to you and your beneficiaries, if applicable;
- ensure that the Scheme is appropriately funded;
- ensure that you can receive information and updates about the Scheme, where necessary;
- respond to queries from you or from HMRC following the transfer of your benefits from the Scheme (where applicable);
- ensure that the Scheme is administered in accordance with all applicable laws; and
- improve the day-to-day running and operation of the Scheme.

We will only use your personal data for the purposes for which it has been collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

What personal data is held?

The personal data held by us in respect of you includes your name, contact details, date of birth, marital status, banking details (where required) and certain employment information, if applicable.

In exceptional circumstances, (eg. ill-health early retirement), we may need to hold special categories of personal data in respect of you (“**Sensitive Information**”). Where we collect these types of information about you, we will take appropriate steps to obtain your consent to our collection and use of this information.

How do we collect your personal data?

We will collect your personal information when you, any of your dependants or relatives or your employer contact us by phone, email or post. We will also obtain your information where this is provided through any other discussions or correspondence that you, any of your dependants or relatives or your employer may have with us. We may also collect personal information about you from other third parties including tracing agencies and from public sources.

Who else receives or processes your personal data?

The Trustee has a number of professional advisers who need to access and process your personal data from time to time to allow the Scheme to be administered properly. The parties to whom the Trustee may allow access to your personal data are as follows:

- the Scheme administrator, the Scheme Actuary, the Scheme’s sponsoring employer and the counterparties to the Scheme’s investments;
- the Scheme’s service providers, professional advisers and auditors;
- local or foreign regulators, governments, law enforcement and tax authorities;
- local and foreign courts, tribunals and arbitrators or other judicial committees, if applicable;
- insurance companies (including, in certain circumstances, insurance companies’ advisers);
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change to the Scheme or the Scheme’s sponsoring employer (including any potential or actual purchaser of the sponsoring employer or their parent companies and that purchaser’s advisers).

How long is your personal data held?

We will hold your personal information on our systems for as long as is necessary in order to carry out the relevant activities or services listed above. However, in certain circumstances it may be necessary for the Scheme to continue to process your information after you have opted out of the Scheme or stopped receiving any benefits from us, for example the Trustee may need to prove that it no longer holds a liability in relation to you.

When determining how long we will hold your personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Will your personal data be kept in the UK?

We may transfer, store, or process your personal information outside the UK. If we do, we will take reasonable steps to ensure that your information is treated securely and in accordance with this notice, including making sure that any personal data we transfer meets the special requirements for international transfers under data protection law. This may include us entering into data transfer agreements based on the model clauses approved under data protection law.

Internet communication

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the safety of your information transmitted via email; any transmission is at your own risk. Once we have received your information, we will use reasonable procedures and security features to try to prevent unauthorised access.

Virtual working

The processing of personal data by the Trustees may be carried out in a virtual environment, particularly where significant amounts of work are completed by individuals working at home. Such work may involve the remote accessing of personal data and video calls on which personal data is shared. The Trustees have arrangements in place to only use methods and technologies that they consider to be secure for this purpose.

What rights do you have in respect of your personal data?

You have the right:

- to withdraw your consent to the processing of your Sensitive Information, to the extent it is processed on the basis of your consent (as set out above). We will process your Sensitive Information (where applicable) unless we receive a written revocation of consent from you;
- to request information regarding the processing of your personal information, including to be provided with a copy of your personal information which we hold;
- to request the correction and/or deletion of your personal information, or object to the processing of your personal information;
- to request to obtain and reuse your personal information for your own purposes across different services; and
- to complain to the Information Commissioner's Office, or to a court of law, if your data protection rights are violated. You may be entitled to claim compensation for damages or distress incurred or suffered in consequence of unlawful processing of your personal information.

If you would like access to the information that we hold about you or exercise your rights as a data subject, if any of the information we hold about you is inaccurate or out of date, or if you object to us processing it, please let us know by emailing us at GemsSensors@buck.com, or writing to us at one of the following addresses:

Buck (Ipswich)
PO Box 323
Mitcheldean
Gloucestershire
GL14 9BL

Scheme Actuary: David Broadbent – 01473 293084
Buck
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