

Partnerships in Care Limited Pension and Life Assurance Plan

Privacy Notice

We, the Trustee of the Partnerships in Care Limited Pension and Life Assurance Plan ("the Scheme"), wish to let you know how your personal data is used. This privacy notice ("Privacy Notice") explains what personal data we collect from you or you provide to us and how we use and protect the personal data that we hold about you.

In this Privacy Notice, the term "**Data Protection Legislation**" means, to the extent applicable, the General Data Protection Regulation (2016/679) ("GDPR"), the GDPR as it forms part of the domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 and the UK Data Protection Act 2018, together with all other applicable legislation relating to privacy or data protection.

You should share this Privacy Notice with your family and dependants where you have provided us with personal data about them.

Please note, the Scheme's Independent Trustee (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Scheme. 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/>

What is personal data?

Personal data broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual. This includes any information provided to us by or on behalf of you, the Scheme's former employers or HM Revenue & Customs in relation to your membership of the Scheme.

Why do we hold your personal data?

As Trustee of the Scheme, we collect, hold and use personal data to help us run the Scheme. The Trustee is a "data controller" in respect of your personal data for the purpose of the Data Protection Legislation.

We collect and process your personal data because you are or were a member, or are or were connected to a member, of the Scheme. We also collect personal data if you contact us in connection with your membership of the Scheme. Without your personal data, we cannot provide you and your dependants with the correct benefits, at the right time. For example, we may need this information to verify your membership of the Scheme, to calculate your pension or to assess whether you are entitled to a specific benefit or how tax rules apply to you.

The Scheme Actuary will also use some of this information so that they can advise us on financial matters. For example, they may use it to value the Scheme's liabilities in order to advise us on how much money should be paid into the Scheme.

What types of personal data might we hold?

We collect and process the following categories of personal data about you:

- Personal contact details – names, titles, addresses, telephone numbers and email addresses;
- Information about you – dates of birth, gender, marital status, dependants and next of kin;
- Employment and payroll details - National Insurance number, payroll numbers, bank account details, tax status, tax codes, earnings (including remuneration), length of service, employment and career history, recruitment and termination details, absence record, job title, working hours and job responsibilities; and

- Pension benefits – information about the pension benefits that you have accrued, pension contribution history, investment choices and death benefit nomination forms.

In certain circumstances, we also collect and process what are known as 'special categories' of personal data (as defined by the Data Protection Legislation). We usually only ask for special category personal data when it is required to help us make a decision in relation to your rights under the Scheme. For example, we may request:

- Health information / medical records – we may ask you to provide health information if you request payment of a benefit that can only be paid if you meet certain medical criteria (e.g. ill-health early retirement benefits). In addition to receiving this information from you, we may receive medical information from third parties such as your doctor or a third-party occupational health provider; and
- Other special category personal data – we may ask you to provide other special category personal data (e.g. information about your personal relationships) if it is relevant to help us decide on an internal dispute resolution procedure.

In addition, certain categories of special category personal data (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Scheme (e.g. birth certificates, marriage certificates, driving licenses and passports). You may also provide us with special category personal data voluntarily (e.g. when raising queries or making a complaint).

Legal Basis for Processing

The legal bases for the processing of your personal information are:

- (a) The Trustee's legitimate interests in administering the Scheme. The Trustee has a legitimate interest in running and managing the Scheme and managing the Scheme's risks and liabilities. In addition, certain third parties, as detailed below, may have legitimate interests which require the processing of your personal data by the Trustee (e.g. your employer may need information in order to comply with regulatory requirements).

In order to rely on this legal ground, we have:

- Considered the impact the processing has on your interests and fundamental rights and freedoms; and
- Implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

- (b) As the Trustee of the Scheme, we are under legal obligations to process your personal data in order to comply with pensions and other relevant legislation, the Scheme's rules, court rulings and Pensions Ombudsman decisions. For example:

- Legislation sets out certain things the Trustee must do (e.g. sending certain information to the Scheme's members); and
- The Trustee is subject to fiduciary duties under trust law to act in line with the Scheme's governing documentation.

It is necessary for us to process your personal data in order to comply with these legal obligations.

- (c) To the extent that we process any special categories of data relating to you, we will do so because either: (i) you have given us your explicit consent to process that personal data; or (ii) there is an alternative legal basis for processing this information under the Data Protection Legislation. If you have given your consent, you can withdraw it at any time by writing to us using the contact details below

Information we obtain from other sources

We receive personal data from sources other than directly from you. This includes information shared by the Society, the Scheme's administrator, its professional advisers, service providers and other similar

third parties. The personal data obtained from these third parties is of the same category as the data listed above.

When we receive this information, we add it to the information we already hold about you in order to help us make sure that your details are as up to date and accurate as possible and so that we can manage your membership of the Scheme and the Scheme more generally. The lawful bases for processing and the legitimate interests for the processing, are the same as for the personal data we receive directly from you.

What do we do with the information?

We may use your personal data for a number of purposes relating to the administration of the Scheme, including the following:

- To calculate and pay your benefits. This includes providing you with details of your benefits and options under the Scheme and dealing with any queries that you have about these;
- To carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- To notify you about services provided to members of the Scheme and any changes to those services or to enable you to access those services;
- For statistical, financial modelling, funding, accounting and reference purposes;
- For internal record-keeping;
- For risk management purposes, including the insurance or management of risks or of the Scheme's benefits;
- For complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes; or
- For complying with demands or requests made by any relevant regulators, government departments and law enforcement or tax authorities or in connection with any disputes or litigation.

How long we keep your information

The Scheme was set up to provide benefits over a very long time. The Trustee needs to maintain records in order to run the Scheme properly, to determine who should receive what level of benefits and when they should receive them, and to respond to any disputes about an individual's rights under the Scheme.

As a result, the Trustee will generally keep your personal data for the lifetime of the Scheme plus 15 years (the longest period of time that someone can bring a claim against the Scheme). Our service providers (and former service providers) may also have similar valid grounds to keep your personal data for such periods.

Generally, we will only keep the information we collect about you for as long as required for the purposes set out in this Privacy Notice or as long as required for us to comply with any legal obligations to which we are subject.

How we protect your information

We use a range of measures to safeguard your personal data, in line with the requirements set out in the Data Protection Legislation. These apply to both paper and electronic records. We also require our third-party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal data.

Sharing your personal data with third parties

The Trustee may disclose personal data about you and your dependants to third parties including Partnerships in Care Limited ("the Company"), professional advisers, your employer (e.g. the payroll, finance, compliance, audit and HR teams), administrators, auditors, insurers, prospective insurers, medical advisers annuity providers, regulatory and/or governmental authorities, other pension schemes or to anyone else if the processing is necessary for the purpose of pursuing a legitimate interest, namely: to administer and manage the Scheme; to assist the Company in its obligations to the Scheme; or to put appropriate insurance in place. We may also share your personal data with any person who is authorised to act on your behalf.

For the purposes of administering the Scheme and paying benefits under it, the Trustee may need to share your personal data with certain third parties. The following table lists the key third party service providers with whom we share your personal data.

Role	Third Party
Actuary	Capita Pensions Solutions
Administrator	Capita Pensions Solutions
Legal adviser	Stephenson Harwood LLP
Auditor	KPMG
Annuity Provider	Aviva
AVC Providers	Utmost Life, Clerical Medical
Banker	Royal Bank of Scotland

Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers, including the Scheme's actuary, also act as separate data controllers in respect of your personal data.

In some circumstances, we may have to disclose your personal data by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal data to the Pensions Regulator or HM Revenue and Customs.

We may also share your personal data with the Scheme's employers to enable them to carry out activities in their legitimate interests (this is usually in connection with managing their business from a regulatory, HR or finance perspective).

Sometimes, in order to improve our knowledge and information of pension schemes generally (so that we may improve our ability to run the Scheme appropriately), we pool the personal data we hold with that of other pension schemes through third parties (for example, to obtain up to date and more accurate longevity data).

The entities listed above may also share personal data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services.

Please note that some of the Scheme's former service providers may continue to hold information about you for their own record-keeping purposes once they have ceased to be involved with the Scheme.

Where do we store your personal information and do we transfer it outside of the UK and EEA?

The personal data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may transfer your personal data outside of the UK or the EEA to respond to any queries that you may have. Some of these destinations may not have data protection laws that are similar to those in the UK and EEA and may not be regarded by the relevant supervisory authorities as providing an adequate level of data protection. Where this applies, we will aim to ensure that the transfer is subject to appropriate safeguards in accordance with the Data Protection Legislation and with this Privacy Notice. A copy of these safeguards can be obtained using the contact information for the Scheme Secretary below.

Your personal data may also be transferred outside the UK or the EEA where the Scheme's service providers host data outside the UK or the EEA.

As a data controller, the Trustee has a duty to keep your data safe. We take all reasonable steps to ensure this is the case but, if you have any questions about how your information is used or kept secure, please contact the Scheme Secretary (contact details below). Where relevant, the Scheme Secretary will pass your questions to the Scheme Actuary on your behalf.

Your Rights

Subject to the provisions of the Data Protection Legislation, you have the right:

- To be told about the data that the Trustee holds about you and, on request, to receive a copy of the information that constitutes your personal data;
- To request access to and rectification or erasure of personal data, to restrict the processing of your personal data and the right to data portability;

- To withdraw consent to processing, to the extent that processing is based on consent (please note that this will not affect the lawfulness of any processing based on consent prior to its withdrawal and we may still be entitled to process your personal data if we have another legitimate reason for doing so, for example we may need to retain your personal data to comply with legal or regulatory obligations or to satisfy our internal audit requirements);
- To restrict processing of your personal data;
- Where applicable, to data portability (moving some of your personal data elsewhere) in certain circumstances);
- To object to your personal data being processed in certain circumstances;
- Not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data;
- To lodge a complaint with the relevant data protection regulator about the processing of your data; and
- To claim compensation for damages caused by a breach of the data protection laws.

If you wish to exercise any of these rights, or wish to contact the Trustee about your personal data, please contact the Scheme Secretary as follows:

Emma McCracken, Partnerships in Care Limited Pension and Life Assurance Plan, c/o Capita Pensions Solutions, 65 Gresham Street, London, EC2V 7NQ.

We will aim to respond to any request received from you within one month from your request. Access to your data will usually be provided free of charge, although in certain circumstances we may make a small charge where entitled to do so under the Data Protection Legislation.

Please note that we may be unable to delete or remove your data whilst we still need this to administer the Scheme.

Any complaints?

If you are not happy with the way in which your personal data is held or processed, please contact us using the details above. You also have the right to complain about data protection matters to your local supervisory authority.

Changes to this Privacy Notice

This Privacy Notice is current as at 30 January 2023.

We keep our Privacy Notice under regular review and may change it at any time. We will tell you about any significant changes.

Issued on behalf of the Trustee

January 2023