

THE YORKSHIRE FITTINGS PENSION SCHEME (“the Scheme”)

Privacy Notice from the Scheme Trustees – October 2023

The Trustees need personal information about you in order to run the Scheme and pay benefits.

In legal terms we are ‘data controllers’ and we are required to tell you some things about the personal information we have about you, how we use it and what your rights are in relation to it.

Why we need your personal information

We need your personal information for the proper handling of all matters relating to the Scheme, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it.

We must have a lawful basis for our use of your personal information and in most cases this will be that the processing is necessary for us to comply with our legal obligations as Trustees of the Scheme, or because we need to process your personal information for the legitimate interests of: administering and managing the Scheme and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustees have in relation to the Scheme.

In certain circumstances we may also rely upon the lawful basis that the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract. Where we are processing “special categories” of particularly sensitive data and you have given consent to the processing of that personal data then the provision of your consent will be the legal basis that we rely upon in relation to that processing.

Collection of your personal information

We collect and process the following personal information about you:

- your personal details such as your name, gender, date of birth, home address, telephone numbers, email addresses, marital status, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- records of our communications with you, including any complaints; and
- in some cases, special categories of personal data such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

We will collect some of this personal information from you. The personal information may also be collected from other sources:

- Your employer or former employer as the case may be;
- the third party administrator for the Scheme (currently Link Pension Administration (HS) Limited);
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP;
- Publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and we are trying to find you.

If we ask you for other personal information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so. If we cannot collect this personal information, we may be unable to record, calculate or pay your or your beneficiaries’ benefits.

How we use your personal information

We use your personal information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;
- b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations and calculations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing should we happen to lose contact with you) or to prevent fraud;
- c) for meeting our on-going regulatory, legal and compliance obligations; investigating or preventing crime, and liaising with, or responding to orders or requests from, government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and HMRC;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme;

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- e) when we undertake or agree to activities from time to time to help us manage the liabilities of the Scheme, such as longevity modelling and hedging, insurance (including securing benefits through a bulk annuity (buy-in) policy), bulk transfers, pension increase exchanges and transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice; and
- f) communicating with the sponsoring employers of the Scheme in connection with your employment or their obligations as employers and, if the situation arises, in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Scheme and their group companies.

Disclosures of your personal information

We may share your personal information with the following recipients:

- our advisers and service providers, including third party administrators, Banks and Deposit takers, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Scheme actuary and actuarial consultants (for actuarial calculations), the Scheme auditors (to carry out the audit of the Scheme's financial statements), our legal advisers (in order to obtain legal advice) and printing, communication, IT and hosting, and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- the employer in relation to the Scheme for audit purposes or in relation to corporate transactions initiated by them;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including our own and those of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

In some instances, advisers and service providers will be data controllers in their own right and will be directly responsible to you for their use of your personal information. They may be obliged under the data protection laws to provide you with additional information regarding the personal information that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers directly, for example, via their websites.

Transfers of your personal information abroad

The use and disclosure of your personal information, including for the purpose referred to in (a) to (f) above, may involve transferring your information outside of the UK or accessing your personal information from outside the UK. In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we require (through a binding agreement) that the recipients comply with appropriate measures designed to ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by a relevant authority in the United Kingdom. Further details of these transfers are available from us on request.

Retention of your personal information

We will only retain personal information for as long as necessary to fulfil the purposes for which it was collected or to comply with legal or regulatory requirements. To do this, we will keep your personal information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our retention management policy documentation. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests. In practice this means that we will retain your data for such period after you (and your beneficiaries) cease to be entitled to benefits as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Scheme.

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/>.

Your rights

You have a right to access and obtain a copy of the personal information that the Trustees hold about you, and to ask the Trustees to correct your personal information if there are any errors or it is out of date or incomplete. In some cases you may also have a right to ask the Trustees to erase or restrict the processing of your personal data or to transfer your personal data.

You also have rights under data protection law to object to the processing of your personal information on grounds which we have said are necessary for our legitimate interests (see above), or for marketing purposes (see above).

If you have any questions or wish to exercise any of the above rights, you can contact us as detailed below.

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Where we obtain information concerning certain “special categories” of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing. However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal information about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained within this notice.

You can also lodge a complaint about our processing of your personal information with the office of the Information Commissioner (www.ico.org.uk).

Further personal information may be required to carry out requests

In some cases, it may be necessary to obtain additional personal information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was updated in March 2023. It is non-contractual. We reserve the right to amend it from time to time, but will notify you where we do this.

Issued on behalf of	The Trustees of The Yorkshire Fittings Pension Scheme.
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