

Royal Blind Group Pension Scheme - Privacy Notice

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the Royal Blind Group Pension Scheme (the Scheme) to comply with data protection laws, including the UK Data Protection Act 2018 (the **DPA 2018**) and the General Data Protection Regulation (as it forms part of UK law pursuant to the European Union (Withdrawal) Act 2018 (the **UK GDPR**)).

Data controller(s)

The Trustee of the Scheme is RBG Pension Trustee Company Limited represented by PAN Trustees UK LLP and Nicholas Chadha. The Scheme Actuary to the Scheme is Scott Binnie FFA of Barnett Waddingham LLP.

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and Scheme Actuary of the Scheme are considered independent data controllers for the purposes of the GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Scheme's auditor or legal advisers.

The data controllers can be contacted as follows:

Royal Blind Group Pension Scheme
c/o Barnett Waddingham LLP
163 West George Street
Glasgow
G2 2JJ
Email: rbgps@barnett-waddingham.co.uk
Telephone: 0333 11 11 222

Use, transfer and storage of personal data

In the course of running the Scheme, we need to hold and use personal data about you. We obtain most of this information from the Scheme's sponsoring employers (for example, information about your work history), or from publicly available sources (for example, if we lose contact with you and need to trace your address). We might also obtain personal data directly from you (for example, if you provide your bank details so that we can arrange to pay your pension). We may hold and process any or all of the following items of personal information about you:

- Personal details including name, membership/reference number, address and contact information, date of birth, gender (including gender recognition certificate), marital status and divorce, family members, beneficiary nominees, passport details and birth or adoption certificate;
- Employment records including employment history, periods of pensionable service (including periods of absence), and salary data;
- Financial details including bank account, tax and National Insurance records; and
- Pension information including contributions paid to the Scheme, pension benefits, additional voluntary contributions, contracting-out records, and death benefit distribution information (including expression of wish forms).

In certain circumstances we might also need to know more sensitive information about you (for example, if you apply to take ill-health early retirement). We have additional safeguards in place for using this kind of sensitive data.

We use all of this personal data in order to make sure that we are properly running the Scheme. This includes:

- Paying you benefits;
- Managing the Scheme's assets and liabilities, including carrying-out actuarial valuations and purchasing insurance; and
- Meeting our record-keeping and reporting requirements, for example to the Pensions Regulator and HMRC.

We may sometimes also use your personal data for the purpose of helping the Scheme's sponsoring employers to understand their liabilities to the Scheme, or to meet their audit or accounting requirements.

Your personal data will be stored for so long as you are a member of the Scheme, and then until such time as we no longer need it to meet our legal obligations or to ensure that any future queries or complaints can be dealt with appropriately; in certain cases the Trustee may decide to delete Personal Data after 7 years.

The Trustee shares your data with the Scheme's administrator Barnett Waddingham LLP, Scheme Actuary, the sponsoring employers and AVC providers. They may also share data with the Trustee's other professional advisers (including the Scheme Auditor, legal advisors and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator) and other parties as required (including insurers to facilitate member benefits being secured externally).

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustee's formal Data Mapping document, available on request in writing to the Trustee at the address above.

The Trustee will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with its **legal obligation** to run the Scheme in accordance with pensions law and the Trust Deed and Rules of the Scheme. The Trustee and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in the Trustee's **legitimate interests** to use your personal information to keep up to date and accurate records about your membership of the Scheme so that the correct benefits can be paid and the Scheme can be run properly and its assets invested appropriately, including by purchasing any insurance.

The Trustee might also sometimes use your data to meet the **legitimate interests** of the Scheme's sponsoring employer; for example, to enable them to understand and manage their liabilities to the Scheme and to meet their accounting, auditing and other requirements.

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external

authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the Trustee, c/o Barnett Waddingham LLP at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>.

Other information

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 if 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/>