

## **HWG 2006 LIMITED PENSION PLAN (THE "PLAN")**

### **PRIVACY NOTICE – PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR SURVIVORS<sup>1</sup>**

As the Trustee of the Plan we need to collect and use personal information about our members and their survivors. This privacy notice sets out how we collect, use and protect your personal information and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

#### **1. PERSONAL INFORMATION WE USE**

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Plan's employers and information we get from other sources, including public databases.

##### **1.1 What Information may we collect directly from you?**

The categories of personal information that we collect directly from you include:

- (a) personal details (for example, your name, date of birth);
- (b) your bank details and national insurance number;
- (c) your contact details (for example, your address, phone number and email address);
- (d) details about who you would like us to consider paying benefits to if you die; and
- (e) your choice of fund for any defined contribution investments.

##### **1.2 What information may we collect from other sources (such as your former employer)?**

These are examples of categories of information we may collect from other sources:

- (a) personal details (for example, your name, date of birth);
- (b) your contact details (for example, your address, phone number and email address);
- (c) information necessary to calculate and pay your benefits (for example, your employment history and salary); and
- (d) information from Her Majesty's Revenue and Customs (HMRC) (for example, your tax code).

##### **1.3 How will we use your personal information and why?**

The ways we use your information include:

- (a) identifying you and your survivors and making sure your details are up to date;
- (b) communicating with you;
- (c) calculating and paying your benefits;

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<sup>1</sup> Version 1.0 – adopted by the Trustee on [date]

- (d) making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death; and
- (e) valuing and managing the liabilities of the Plan.

We must have a legal reason to use your personal information. This will usually be one of the following:

- (f) to fulfil our legal obligations, such as giving you specified information about your benefits as required by pension legislation;
- (g) to meet our legitimate interests to administer the Plan efficiently and to pay benefits to you and your survivors in accordance with the Plan rules;
- (h) because we need to use the information to fulfill our obligations (for example, to pay ill health pensions or benefits after your death) and our use of the information is authorised by law; or
- (i) because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health, we may ask for your consent to process your data. Where this applies, you may take back your consent at any time by contacting us. This will be explained in more detail in any forms where we request such information.

## **2. INFORMATION SHARING**

### **2.1 We may share personal information with:**

- (a) the Plan's administrators and our advisers (such as the plan actuary, auditor, secretary to the Trustee and our legal advisers) to facilitate the administration of the Plan and your benefits;
- (b) HMRC and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund; and
- (c) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes.

### **2.2 We may also provide some of your personal information to Arran Isle Limited to help it to make decisions relevant to its role as Principal Employer of the Plan and to allow it to account for its pension liabilities properly. We will only do so to the extent that we consider it necessary for these purposes.**

## **3. SECURITY AND STORAGE**

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

We will keep your personal information for as long as we have a relationship with you or your survivors. When deciding how long to keep your personal information after our

relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

**4. YOUR RIGHTS**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us.

**5. INTERNATIONAL DATA TRANSFER**

Your personal information may be transferred to, stored, and processed in a country that is not subject to European Union law on data protection. Where your personal information is to be transferred outside the UK (for example by the administrator) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

**6. CHANGES TO THIS POLICY**

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are posted on the website at [www.HWGpension.co.uk/privacy](http://www.HWGpension.co.uk/privacy).

**7. OTHER DATA CONTROLLERS**

The Scheme Actuary and First Actuarial are also joint data controllers of the Plan. A privacy notice setting out how First Actuarial will use and protect your personal information is enclosed and can also be found by emailing [leeds.admin@firstactuarial.co.uk](mailto:leeds.admin@firstactuarial.co.uk) or at [www.HWGpension.co.uk/privacy](http://www.HWGpension.co.uk/privacy). In addition to the Scheme Actuary and First Actuarial, the Plan's legal adviser, and auditor may also be data controllers in relation to your personal information and have to comply with their own legal obligations, industry codes and standards when processing your data. Information about where to find their data protection information can be obtained from the administrator by email to [leeds.admin@firstactuarial.co.uk](mailto:leeds.admin@firstactuarial.co.uk).

The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact the Trustee via the Plan Administrator at:

Phone: 0113 818 7300

Email: [leeds.admin@firstactuarial.co.uk](mailto:leeds.admin@firstactuarial.co.uk)

7.1 If you believe that we have not resolved your concerns, you can complain to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

7.2 We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.