Privacy Notice for the Babcock Wanson UK Pension Scheme

Who we are

This privacy notice explains how the Trustees of the Babcock Wanson UK Pension Scheme (the **Scheme**) use personal data relating to members and beneficiaries.

The Trustees are responsible for deciding how and why personal data is used in connection with the Scheme. The Trustees are registered with the Information Commissioner's Office (**ICO**) as a controller of personal data.

This notice is also available online at www.babcock-wanson.com/terms-conditions.

Why we use your personal data

We hold and use personal data to administer and manage the Scheme and its liabilities. This includes, for example:

- maintaining accurate member records;
- calculating, securing and paying benefits;
- dealing with contributions, transfers and other benefit options;
- communicating with members and beneficiaries;
- managing the Scheme's investments, funding and other liabilities;
- complying with legal, tax and regulatory requirements;
- dealing with queries, complaints, disputes and legal claims; and
- considering changes affecting the Scheme, including insurance arrangements, transfers, mergers or changes affecting sponsoring employers.

We process personal data where this is necessary to comply with our legal obligations, to administer and manage the Scheme and its liabilities, or otherwise for our legitimate interests where these are not overridden by your rights and freedoms. In some circumstances, we may also rely on your consent.

The personal data we hold

Depending on your relationship with the Scheme, we may hold:

- identity and contact information, such as your name, date of birth, address, telephone number, email address and National Insurance number;
- employment and membership information, including your employment history, pensionable service, salary, contributions and Scheme membership;
- financial and tax information, including bank account and tax details;

- information about your benefits, including benefits accrued, paid or transferred;
- information about your family, dependants and potential beneficiaries;
- information required in connection with transfers, benefit options, queries or disputes;
- health information where this is relevant to assessing entitlement to benefits or dealing with a claim; and
- in limited circumstances, information relating to criminal convictions or offences where this is necessary for a relevant legal or regulatory purpose.

We may obtain personal data directly from you, from your current or former employer, from other members or beneficiaries, and from other sources where appropriate. These may include tracing agencies, public databases, advisers, insurers and insurance providers, AVC providers and government or regulatory bodies.

If you provide us with personal data about another person, such as a dependant or potential beneficiary, please make them aware of this privacy notice.

Who we share your personal data with

We may share personal data with organisations that help us administer and manage the Scheme. Depending on the Scheme's arrangements, these may include:

- the Scheme administrator;
- legal, actuarial, audit and investment advisers;
- insurers and other providers of benefits or services;
- banks, payroll providers and tracing agencies;
- IT, communications and document distribution providers;
- sponsoring employers and relevant group companies;
- other pension schemes, pension providers or insurance providers in connection with transfers, mergers, buy-ins, buy-outs or other changes affecting the Scheme; and
- HMRC, the Pension Protection Fund, pensions dashboards, government bodies, regulators, dispute resolution bodies, courts and law enforcement agencies where appropriate or required.

Some of these organisations may be independent controllers of personal data and may provide you with their own privacy information.

Transfers outside the UK

Some organisations which process personal data on our behalf, or with whom we need to share personal data, may be located outside the UK.

Where this happens, we will ensure that appropriate safeguards required by data protection law are in place. You can contact us if you would like further information about those safeguards.

How long we keep your personal data

We keep personal data for as long as necessary to administer benefits and manage the Scheme and its liabilities.

This may mean retaining information for as long as you, or a beneficiary who may become entitled following your death, have rights or potential rights under the Scheme. We may also retain information for longer where necessary to deal with legal, regulatory, tax, complaint or claim requirements.

Your rights

Depending on the circumstances, you may have the right to:

- request access to the personal data we hold about you;
- ask us to correct inaccurate or incomplete personal data;
- ask us to erase personal data;
- ask us to restrict the use of your personal data;
- object to certain processing of your personal data;
- request the transfer of certain personal data to another organisation; and
- withdraw your consent where we rely on consent to process your personal data.

These rights do not apply in all circumstances.

If you wish to exercise any of these rights or have any questions or concerns about how we use your personal data, please contact the Trustees using the details below.

Complaints

If you consider that your statutory data protection rights have been infringed in relation to your personal data, you may raise a complaint with us using the contact details (post, email and/or telephone) set out below. We will acknowledge receipt of any complaint within 30 days of receipt. We will then make appropriate enquiries, keep you informed about the progress of the complaint and inform you of the outcome, without undue delay.

Data protection complaints are dealt with separately from complaints about the administration of the Scheme or other service-related matters.

You also have the right to complain to the Information Commissioner's Office. Further information is available from the ICO.

If you do not provide information that we reasonably need to administer your benefits, this may affect our ability to administer or pay those benefits.

Changes to this notice

We may update this privacy notice from time to time. Where appropriate, we will notify you of significant changes and tell you when any revised notice takes effect.

Contacting us

Please contact the Trustees if you have any questions about this privacy notice or how your personal data is used:

Trustees of the Babcock Wanson UK Pension Scheme

C/O: Mrs Dawn Perring, Babcock Wanson UK Finance Manager

Tel: + 44 (0)20 8953 7111

Email: dperring@babcock-wanson.com

Schedule: Our use of your personal data in more detail

The table below provides further information about the main ways in which we use personal data in connection with the Scheme.

Main purpose	Types of personal data	Why we use it
Administering the Scheme and paying benefits	Identity and contact information; employment, membership, contribution and benefit information; financial and tax information; family and dependant information	To maintain member records, calculate and pay benefits, deal with contributions and transfers, communicate with members and beneficiaries and provide information required in connection with the Scheme
Managing the Scheme and its liabilities	Identity, membership and benefit information and, where relevant, financial information, and other relevant information	To manage funding, investments, insurance arrangements, valuations, audits and other aspects of the Scheme 's liabilities and administration
Complying with legal and regulatory requirements	Information relevant to the legal obligation	To comply with pensions, tax and other legal or regulatory requirements, including reporting to and liaising with HMRC, regulators, the Pension Protection Fund and other relevant bodies
Dealing with transfers and changes affecting the Scheme	Identity, membership, benefit and financial information, and other relevant information	To deal with transfers, benefit options, insurance arrangements (including buy-ins and buy-outs), Scheme mergers or other changes affecting the Scheme or its sponsoring employers
Dealing with queries, complaints and disputes	Information relevant to the issue, which may include health or other sensitive information where necessary	To respond to queries and complaints and to establish, exercise or defend legal claims

The Trustees will rely primarily on legal obligations and legitimate interests when carrying out these activities, together with any other lawful basis that is appropriate in the circumstances.

Where we process **health information or other special category personal data**, we will do so only where an appropriate condition under data protection law applies. This may include where processing is necessary in connection with employment, social security or social protection law, with your explicit consent where required, or for the establishment, exercise or defence of legal claims.

Where we process **information relating to criminal convictions or offences**, we will do so only where this is permitted by applicable law and an appropriate legal condition applies.