

Castle Pension Scheme (the "Scheme")

Our privacy policy – How we use your personal information

We are sending you this privacy policy to help you understand how we collect, store and use your personal information for the purposes of the Castle Pension Scheme (the "**Scheme**"). **This is for information only – you do not have to take any action in response to this information.**

1. Introduction

Castle Pension Scheme Trustees Limited (company number 07656439), as Trustee of the Scheme (referred to in this policy as the "**Trustee**" or "**we**" or "**us**"), collects and uses your personal information in order to administer the Scheme and to pay benefits due to Scheme members and other beneficiaries.

We are committed to protecting your personal information. This statement tells you more about when, from whom and why we collect your personal information and how we use it.

The Trustee is the data controller of the personal information to which this notice relates and can be contacted using the details in section 10.

2. Personal information that we collect

The types of personal information that the Trustee may collect and use include:

- Your full name, address and contact details
- Your date of birth
- Your sex/gender
- Your marital (or relationship) status
- Your benefit entitlement under the Scheme
- Information about your health
- National Insurance Number and/or other evidence of identity
- Details of your salary and other forms of remuneration
- Details of your bank account
- Details of any nominees to be considered for benefits in the event of your death

3. Where does your personal information come from?

Most of the personal information that we hold is provided by members when they joined the Scheme or subsequently contact the Trustee (or organisations appointed by the Trustee to help with the running of the Scheme) about their benefits.

Other information about you may be provided by current and former employers participating in the Scheme, other pension schemes and pension providers, independent financial advisers, medical practitioners, other advisers or service providers to the Trustee and Her Majesty's Revenue and Customs (HMRC).

4. What does the Trustee do with your personal information?

The legal basis for us using your personal information is to enable us to comply with our legal obligations as the trustee of the Scheme, which include paying benefits to you and other beneficiaries in connection with members' employment (or previous employment) with an employer participating in the Scheme. We also have a legitimate interest in using your personal information to ensure the efficient administration of the Scheme and to help us and the employers participating in the Scheme review and manage financial matters relating to the Scheme, together with our respective advisers.

In some limited circumstances, the Trustee will only collect and use certain special categories of personal information with your express consent. We will make clear to you when your consent is needed.

If we are not provided with the personal information about you that we need, it may not be possible for us to provide some or all of the benefits otherwise payable in respect of you from the Scheme.

5. Sharing your personal information with other parties

Where the Trustee considers it necessary for the purposes explained in section 4, your personal information may be shared with selected third parties, such as the Trustee's actuarial and financial advisers and other professional services providers, including those who provide data processing, administration and communication services to the Scheme. The Trustee may also share personal information with regulatory authorities and healthcare practitioners, insurers, AVC providers, financial advisers, annuity brokers, employers participating in the Scheme, HMRC, the Pensions Regulator and any other third parties with whom we are authorised or required by law to share personal information.

Some of the third parties with whom your personal information is shared may be located outside the European Economic Area (EEA) (for example, this may happen if computer servers used by our providers are located or backed up in a country outside the EEA).

Under data protection legislation, we can allow your personal information to be transferred outside the EEA if:

- (a) the country to which your personal information is being transferred has been confirmed by the European Commission to provide adequate protection for personal information; or
- (b) the entity that is holding your personal information has entered into a written contract which requires it to provide all protections to your personal information required by data protection legislation.

In the event that the UK is no longer part of the EEA, references in this section to the "EEA" should be taken to mean the EEA and the UK.

Further information about transfers of personal data outside the EEA can be obtained by contacting us at the address below.

We will also share personal information with the actuary to the Scheme. The actuary to the Scheme is a joint data controller with the Trustee when using personal information held in respect of you for the purposes of assessing, with the Trustee, financial matters affecting the Scheme. The current actuary to the Scheme is Stephen Geere FIA, whose address is: Mercer Limited, Tower Place, London EC3R 5BU.

6. How long does the Trustee keep your personal information for?

We will keep your personal information in accordance with our data retention policy as it applies from time to time. We will need to keep personal information for as long as is reasonably necessary to determine members' entitlement to benefits from the Scheme and to comply with our legal obligations in relation to the administration of the Scheme.

7. Accessing and updating your personal information

Data protection legislation gives individuals the following rights in relation to personal information held about them:

- individuals can ask what personal information is held about them and be provided with a copy;
- if personal information held about an individual is incorrect, he or she can ask for it to be corrected;
- individuals can ask for personal information about them to be deleted or for processing of that personal information to cease in certain circumstances, for example, where that information is no longer needed;
- individuals can request that certain types of personal information held about them is sent to them, or another organisation, in a format that can be read by computer; and
- individuals can withdraw their consent to how their personal information is being processed, where that processing is based on their consent.

Exercising these rights is subject to certain restrictions under data protection legislation. For further information about these rights, you should write to:

Castle Pension Scheme
Capita Employee Solutions
Hartshead House
2 Cutlers Gate
Sheffield
S4 7TL

8. Complaints

If you are unhappy at any stage with how your personal information is being used in connection with the Scheme, you have the right to lodge a complaint with The Information Commissioner's Office (www.ico.org.uk).

9. Changes to our privacy policy

This statement is subject to regular review and may be updated from time to time. We will tell you if we make any changes to how your personal information is used.

10. Contact us

If you have any questions about how your personal information is used, including in relation to the arrangements we have in place with the Scheme actuary, please feel free to contact us at the following address:

Castle Pension Scheme
Capita Employee Solutions
Hartshead House
2 Cutlers Gate
Sheffield
S4 7TL

Castle Pension Scheme Trustees Limited

May 2018