

## **PRIVACY NOTICE FOR THE ROYAL LONDON GROUP PENSION SCHEME**

### **(the “Scheme”)**

RLGPS Trustee Limited (the “**Trustee**”), as the trustee of the Scheme, holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

#### **What we do with your data**

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme, and for other legitimate purposes relating to the operation of the Scheme, which include:

- calculating, administering and paying your benefits under the Scheme or following your death;
- processing ill-health retirement claims;
- dealing with any queries/complaints/appeals etc. regarding decisions we have made, for example in relation to your or your dependants’ entitlement to benefits under the Scheme;
- carrying out actuarial valuations and investment of the Scheme’s assets (including the purchase of insurance policies); and/or
- compliance with legal, regulatory and good governance obligations and as otherwise lawfully permitted from time to time.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by third parties such as The Royal London Mutual Insurance Society Limited and its subsidiaries (the “**Employer**”), other pension schemes from which members have transferred, HMRC, the DWP and regulatory bodies and by tracing organisations. We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals. The data we hold is to assist the trustees to calculate and pay the benefits the members are entitled to and may include (but is not limited to):

- full name, age, gender, date of birth, national insurance number, passport or ID number, and or other governmental identification numbers;
- business and/or personal contact details, including address, telephone numbers and email addresses;
- financial information, including salary, tax information, pension or prospective pension entitlement, bank account details;
- employment details, including years of service, dates of employment, full or part time employment status, job band, salary, compensation, employee claims, bonuses and benefits;
- pension scheme status, including start date and leave date and membership or individual reference number;
- your preferences in relation to your pension benefits (including death benefit distribution information); and
- marital status and relationship data, including the full name, date of birth, contact details and relationship to your family members, dependants and/or beneficiaries.

We also hold some special categories or “sensitive” data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data, then you can withdraw it at any time.

### **Who else processes your data?**

We share your personal data with certain third parties involved in running the Scheme, for example, the Scheme Administrator (currently Willis Towers Watson (“WTW”)), the Scheme Actuary (currently Andrew Long of WTW, who also provide actuarial consultancy services), the Trustee’s legal advisers (currently CMS Cameron McKenna Nabarro Olswang LLP) the Scheme’s independent professional trustee (currently The Law Debenture Pension Trust Corporation p.l.c), the Scheme’s auditor, life assurance providers, insurers (including The Royal London Mutual Insurance Society Limited in its capacity as an insurer to the Scheme), investment managers, additional voluntary contributions providers, medical advisers, communications providers, tracing organisations, HMRC, DWP, the Pensions Regulator, the Pensions Ombudsman and the Pensions Advisory Service, and other persons who may become involved in or responsible for providing or communicating benefits, including occupational health service providers.

In some circumstances we are joint controllers with the Scheme Actuary, the legal advisers (who will process personal data to comply with their professional duties as advisers to the Trustee) and the Employer. The Employer holds personal data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in a cost effective way and may have an interest in offering certain options to members. The Trustees will share information with the Employer and its auditors and advisers for this purpose and for the purposes of insuring Scheme benefits.

The Trustee, the Employer, WTW and other advisers may from time to time transfer data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

### **Storage of your personal data**

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Scheme ends.

Once your membership ends, we may consider from time to time whether to delete some of the data held in relation to you. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise at a later time.

WTW will hold on to your personal data for 7 years after the termination of their contract with us. This is to protect themselves against any subsequent legal claims.

### **Your rights**

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information,

you may withdraw that consent at any time. However if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

**Contact details**

If you have any questions about this please contact the Trustee as follows:

Royal London Group Pension Scheme  
Willis Towers Watson  
PO Box 545  
Redhill  
RH1 1YX  
Tel: 0113 394 9307  
E-mail: royallondongroup@willistowerswatson.com

**What if you have a complaint?**

To make a complaint about how we've handled your information, contact us as set out above.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745