

Eaton-Williams Group Pension & Assurance Scheme

Privacy Notice

You do not need to take any action with regard to this privacy notice except to note its contents.

The purpose of this notice is to help you understand how we collect and use your personal information, and what your rights are in respect of that information.

Who we are

As the Trustees of the Eaton-Williams Group Pension & Assurance Scheme (“the Scheme”), we hold certain personal information about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustees in running the Scheme will be “personal data” (in other words, because we hold information from which you as an individual can be identified). Any information we hold in respect of you will be subject to certain protections.

For legal purposes, the Trustees are known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your address
- your national insurance number
- details about your pension benefits and salary information
- details of your bank account to pay benefits)
- details about your dependants and/or beneficiaries so that we can pay benefits following your death
- medical and other details about your health that you have given us if you apply to receive benefits on these grounds or if these details are collected for statistical purposes.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death. We will not collect any personal data that we do not need.

How we use that information

The Trustees have a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation.

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustees must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special categories of personal data"). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "special categories of personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

What else we might do with personal data

We may transfer, store, or process your personal data outside of the UK. Where this is the case, we will take reasonable steps to ensure that your personal data continues to be appropriately secured. This may include entering into data transfer agreements based on the model clauses approved by the European Commission or, where relevant, the UK, to ensure that third parties commit to ensuring an adequate level of protection for your personal data.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

However, as the Trustees need help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current, past or future employer;
- the Scheme's professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustees, including mortality tracing agencies
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustees can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the summary funding statement
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK
- our Scheme Actuary, currently Donna Prince of Aon Solutions UK Limited – as we are required by law to have the Scheme's funding level assessed every three years. In order to do this, the actuary needs certain scheme membership information, and details about contributions and investments. The actuary also calculates transfer payments, retirement benefits and other Scheme benefits on our behalf. The Aon Privacy Notice is available online at: [Aon Solutions UK Limited Privacy Notice](#)
- our investment managers – who advise us on the most appropriate investments for the Scheme. From time to time, we may ask our investment managers to investigate specific investments so as to secure individual or a particular class of member benefits outside of the Scheme (for example, through an annuity with an insurance company)

In some instances advisers and service providers will be data controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example, via their websites.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustees may be required to keep some of your personal information for the rest of your life so that we have the information we need to pay benefits and answer queries about your benefits.

Your rights

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected
- You can require the Trustees to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- As we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustees can override this objection in certain circumstances.
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact" below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustees to continue processing your personal data where this is justified.
- You can request that your personal data is deleted altogether, although the Trustees can override this request in certain circumstances.
- You have the right to complain to the Information Commissioner's Office, or to bring an action before the court, if your personal data rights are not complied with (see "Making a complaint to the Information Commissioner's Office" below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

please contact the Scheme administrator, Aon, on **0300 123 6445** or write to them at The Eaton-Williams Group Pension & Assurance Scheme, Aon, PO Box 196, Huddersfield, HD8 1EG.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

Updates to this notice

This notice is the latest version as at July 2023. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at [Eaton-Williams Pensions \(menlosecurity.com\)](https://www.menlosecurity.com). Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).