

## The Wiggins Teape Pension Scheme

### Privacy notice

We are the Trustees of the Wiggins Teape Pension Scheme.

We are sending you this notice because you:

- are a member of the Scheme; or
- are (or might be) eligible to receive benefits following the death of a member of the Scheme.

As Trustees, we process 'personal data' about you in order to run the Scheme and pay benefits. We also share your personal data with some other people. Personal data is any information that could be used to identify you as a living individual.

This privacy notice describes what personal data we collect about you and other people (for example, your spouse, civil partner, partner or dependants).

It also describes how we process (i.e. handle) your personal data, the basis upon which we process it, with whom it is shared, how it is stored, how it is protected and what rights you have in relation to it (including a right to object to processing in certain circumstances).

**Please read this privacy notice carefully as it contains important information.**

#### 1. What personal data do we collect about you and how?

We collect personal data from you in a number of different ways:

- you may share information with us;
- we may collect certain personal data from third parties (please see below);
- we may also generate certain personal data in our running of the Scheme (for example, information relating to your contributions and benefits).

If you are a member, we collect personal data from the following third parties:

- your former employer;
- any financial or other adviser or representative acting on your behalf and, if you want to transfer benefits, the trustees or managers of other pension schemes to which you may wish to transfer;
- providers of services that allow us to verify the accuracy of your personal data (for example, to trace your current address or to verify your continuing existence); and
- public databases (for example, the register of births, deaths and marriages), government agencies (for example, Her Majesty's Revenue or Customs (HMRC) or the National Insurance Contributions Offices (NICO)).

If you are (or might be) eligible to receive benefits following the death of a member, we may need to collect personal data from the following third parties:

- public records (for example, the register of Births, Deaths and Marriages);
- any adviser or representative acting on your behalf;
- other people who know or are related to, or were dependent upon the member, and anyone representing them;
- the executors of the member's will or the member's personal representatives and anyone representing them.

The types of data we may collect and use are set out in section 11 below.

In certain circumstances, we may ask you for personal information which is more sensitive. Examples would be where we ask for information that may reveal your racial or ethnic origin, religious beliefs, sex life or sexual orientation, or information relating to your health (for example, if you cannot work any longer due to incapacity and you want to take your pension benefits early).

When we ask for sensitive information, we will only ask for as much information as we need. We will also explain to you why we need that information and how we intend to use it. We may also need to handle information about criminal convictions relevant to you.

When we need to, we will ask for your consent for us to use your sensitive information or information about criminal convictions and offences. However, there are some cases where the law allows us to use sensitive information without your consent, including where we need to use it to establish, exercise and defend legal claims.

You may also need to provide us with personal data relating to other people (for example, your spouse, civil partner, partner or dependants). When you do so, you will need to check with them that they are happy for you to share their personal data with us and for us to use it in accordance with this privacy notice.

## **2. How do we use your personal data?**

We primarily use your personal data for the purposes of operating the Scheme. This includes making decisions about you and your options and entitlements, and calculating your benefits and communicating with you.

It also includes matters to do with the wider operation of the Scheme. For example, we may use personal data for the purpose of advising the Trustees on the management of the Scheme. We may also use personal data to set up insurance policies to meet Scheme liabilities, or in connection with liability management exercises.

We will also use your personal data for the purposes of complying with any laws, and procedures which apply to us, answering questions, dealing with complaints and in order to exercise or defend our legal rights. This will include transferring your personal data at the end of the Scheme's winding-up to an insurance company.

Finally, we may occasionally use your personal data for the purposes of statistical analysis or to respond to government surveys (for example, questionnaires sent to us by the Pensions Regulator or the Office of National Statistics), but this is usually completed on an anonymous basis.

If we or the other Data Controllers involved with the Scheme wish to use your personal data for any additional purposes, we will update this privacy notice.

## **3. What is our lawful basis or ground for using your personal data?**

Under laws which are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.

As Trustees, we have certain duties and powers which are conferred on us by law or by the Scheme's governing documents. In most cases, our processing of your personal data is necessary for the performance of those duties and exercise of those powers.

Certain uses of your personal data, or other processing activities, will not be strictly necessary to perform our legal duties, or to exercise our powers; however, they will be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean ours (or a third party's) interests in operating the Scheme as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

If we rely on our (or a third party's) legitimate interests for using your personal data, we will undertake a *balancing test* to ensure that our (or the third party's) legitimate interests are not outweighed by your interests. You can ask us for information on this balancing test by using the details in section 10 of this notice.

If we are processing personal data in a certain way because it is in ours (or a third party's) legitimate interests (and not, for example, because it is necessary for the performance of our legal duties), you have the right to object to this processing.

In certain circumstances, we will need your consent to collect and use your personal data; this is most likely where we are collecting and using information relating to your health, or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, sex life or sexual orientation. If we have

asked for your consent, you may withdraw your consent at any time.

You may withdraw your consent, or object to our processing of your personal data in a certain way (where you have the right to do so), by using the contact details set out in section 12.

However, if you withdraw your consent or object to our processing of your personal data, this may impact our ability to consider whether you are eligible to receive benefits, put your benefits into payment, or continue to pay benefits to you.

#### **4. In what circumstances do we share your personal data?**

We will share your personal data with the following categories of third parties:

- the Trustees;
- your former employer - for the purposes of operating the Scheme;
- our administrators – we delegate some of our duties as Trustees to administrators; they are effectively responsible for the day-to-day running of the Scheme;
- the Scheme actuary – this is an actuary that is personally appointed to the Scheme to provide us with advice on the funding of the Scheme. The actuary will be supported by an actuarial team who will also have access to your personal data;
- our benefit consultants – they provide advice on all aspects of running the Scheme including the level and form of benefits to be provided to members of the Scheme, investment, member communication and strategies for managing and mitigating the risks associated with the Scheme;
- insurance companies – both insurance companies who provide cover for the payment of death benefits and insurance companies who provide annuity policies securing the Scheme benefits;

- our investment managers and AVC providers – they invest the Scheme assets on our behalf;
- our auditors – they prepare the Scheme's annual accounts and audit them for us;
- our lawyers – they advise us on all legal issues affecting the Scheme;
- our payroll agents – they arrange payment of pensions;
- our indemnity insurers;
- any staff we employ and other companies that provide services to us (or to our administrators), such as communications consultants, printers, suppliers of data cleansing, verification and tracing services and information technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services;
- the PPF – for it to assess whether the Scheme is eligible for transfer to the PPF;
- any financial adviser in relation to transferring your benefits to another pension scheme (and the trustees or managers of the pension schemes you transfer or your benefits are transferred to);
- statutory bodies or government agencies (for example, Her Majesty's Revenue or Customs (HMRC)); and
- other third parties – where you are a member and we are unable to trace you, in ours and your interests, we share your personal data (name and employment details) with third parties to whom you may have a connection (such as other members) for the purposes of being able to trace you and administer your benefits under the Scheme.

We will also disclose your personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or any lawful request from any legal or regulatory authority; or
- to respond to any claims, and to establish, exercise or defend our legal rights.

As Trustees, we are a 'data controller' of your personal data. This means we are responsible for keeping your personal data safe and secure.

Some of the third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. They are known as 'data processors'.

However, certain third parties (most notably, the Scheme actuary, insurers, auditors, lawyers and other professional advisers) are subject to certain legal or regulatory obligations, including professional codes of practice. They will be 'data controllers' (and so directly responsible to you for their own processing of your personal data) to the extent that processing is subject to, or relates to, those obligations.

Some of these data controllers have their own, separate, privacy notice which applies to their use of your personal data instead of this notice. A full list of these third parties, and copies of their privacy notices, can be obtained by contacting the Trustees (see section 12). Links to the privacy notices for the Scheme actuary and Scheme lawyer are set out below:

Scheme actuary means James Miller of Aon: [www.aon.com/unitedkingdom/privacy.jsp](http://www.aon.com/unitedkingdom/privacy.jsp).

Osborne Clarke LLP, legal advisers: <http://www.osborneclarke.com/website-privacy/>.

## 5. Do we transfer your personal data outside the UK?

In certain circumstances, your personal data may be processed outside of the UK; for example, third party service providers that may store certain personal data in a country outside the UK.

If we (or our service providers) process personal data outside of the UK, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice, and in accordance with applicable laws.

There are several measures for ensuring an adequate level of protection; including where certain countries have been deemed "adequate" by the Secretary of State in the UK (for example, countries within the EEA have been deemed adequate), or where we transfer Personal Data outside the UK on the basis of the standard data protection clauses approved for use in the UK (or example, where we incorporate those clauses into our contracts with service providers based outside the UK).

Further details on the steps we take to protect your personal data in those cases are available from us on request.

## 6. How long do we retain your personal data?

We keep your personal data for no longer than we need to for the purposes for which we use it, as set out in section 2 of this notice.

As a minimum, the Trustees are required by the PPF to keep (or ask the Scheme administrator to keep on our behalf) your personal data for a period of two years from the date that the Scheme has been bought out by an insurance company.

## 7. What are your rights in relation to your personal data?

You have the following rights in relation to your personal data. You can ask us for more information about any of these rights by contacting us using the details in section 10:

- (a) **Right of access.** You have a right of access to any personal data we hold about you, including asking us for a copy of your personal data;
- (b) **Right to update your information.** You have a right to request an update to any of your personal data which is out of date or incorrect;
- (c) **Right to delete your information.** You have a right to ask us to delete any

personal data which we are holding about you in certain specific circumstances;

- (d) **Right to restrict use of your information:** You have a right to ask us to restrict the way we process your personal data in certain circumstances;
- (e) **Right to data portability:** You have a right to ask us to provide your personal data to a third party provider of services in certain circumstances;
- (f) **Right to object.** Where we process your personal data on the basis of our, or another person's, legitimate interest, you have a right to ask us to consider any valid objections which you have to our use of your data.

We will consider all requests from you to exercise your rights (including whether they apply in a particular case) and provide our response within a reasonable period. In any event we will provide a response within one month of your request, unless we tell you we are entitled to take a longer period.

Please note that certain personal data may be exempt from such requests, for example if we need to keep using the information to comply with our own legal obligations. If an exception applies, we will tell you this.

When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

## 8. How do we keep your personal data secure?

The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to take all reasonable precautions to safeguard the confidentiality of personal data.

Although we make every effort to protect the personal data you provide, the transmission of information over the internet is not completely secure. As such, you acknowledge that we cannot guarantee the security of personal data transmitted in this way, and that any such transmission is at your own risk.

Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access, and take steps to ensure that any third parties with whom we share data do the same.

## 9. Changes to this privacy notice

We may amend this privacy notice from time to time. Any changes we make will be notified to you in the next communication from us, such as the annual summary funding statement, your annual benefit statement (if sent), member newsletter, or an updated version of the explanatory booklet.

## 10. Further questions or complaints

If you have any queries or complaints about our collection, use or other processing of your personal data, or if you wish to exercise any of your rights described above, please contact Keith Taylor using the contact details in section 12.

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.

You may also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection regulator, or a different data protection regulator in the country where you usually live or work, or where an alleged infringement has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

## 11. Personal data we process

We may collect and use the following types of personal data about you and, in some cases, your spouse, civil partner, partner or dependants:

- name(s);
- gender;
- national insurance number;
- employee and membership number;
- date of birth;
- home address and telephone number;

- personal e-mail address;
- marital status and family / dependants (e.g. benefits payable on death);
- your current or former employer;
- the date you joined and left employment and employment status (e.g. full time or part time);
- dates on which you joined and left pensionable service;
- your salary information;
- your normal or anticipated retirement date;
- your status as a member of the Scheme;
- circumstances of retirement or leaving service;
- information relating to your health (e.g. in relation to incapacity benefits);
- information on criminal convictions;
- information relating to your benefits;
- information relating to any money purchase benefits in the Scheme (including how these are invested);
- information relating to any pension sharing or earmarking order);
- tax information, your income tax band, and any protections you have in relation to your benefits; and
- your bank account details.

Pension Trust Corporation plc (normally represented by Mike Jaffe) and BESTrustees Limited (Ann Rigby), or such other entities that act as trustees from time to time.

The Trustees may be contacted via:

Email: keith.taylor@firstactuarial.co.uk

Letter: Keith Taylor, Head of Pensions

The Wiggins Teape Pension Scheme  
c/o First Actuarial LLP  
Network House, Basing View  
Basingstoke  
Hampshire  
RG21 4HG

**This privacy notice was last reviewed and updated in October 2023.**

## 12. Defined terms

In this privacy notice, the following terms have the following meanings:

**Scheme** means the Wiggins Teape Pension Scheme.

**Trustees, us, we or our** means the trustees of the Scheme being Beaufort Trust Corporation Limited (Simon Hartley), The Law Debenture