

NCR (Scotland) Pension Plan (“the Plan”) Data Privacy Notice

Background

This statement sets out how the Trustee of the NCR (Scotland) Pension Plan (“the Trustee”) handles personal information in compliance with the Data Protection legislation, including the Data Protection Act 2018 and the General Data Protection Act 2018 and the General Data Protection Regulation (the “Regulations”).

We recognise that the correct and lawful processing of personal data is important and integral to our successful operations and to maintaining the trust of the people we deal with. We fully endorse and adhere to the principles set out under the Regulations.

For the purpose of this statement, the term “personal data” shall refer to personal data and sensitive personal data processed by us.

The Trustees may act as a Data Controller in relation to the handling of the personal data and sensitive personal data of the persons/organisation we deal with. You can contact the Trustee using the details at the end of this notice.

Purpose and legal basis for processing the personal data

This Privacy Notice is addressed to the Plan members and the Trustee processes personal data so that we can properly administer your benefits. The processing of personal data enables us to pay your pension and other benefits when they come into payment. We may also process personal data in order to comply with our regulatory and tax obligations, and to help the sponsoring employer understand its liabilities to the Plan.

As a Data Controller, the Trustee has a legal obligation to administer and pay your benefits from the Plan. We will therefore hold and process your data on this legal basis. Both the Trustee and our advisers and administrators also have legitimate interest in ensuring that the Plan is properly run in accordance with our regulatory and tax obligations, and so may process your data on that basis. We might also process your data on the basis of the sponsoring employer’s legitimate interest in understanding and managing its liabilities to the Plan. You may object to the processing of your personal data on the basis of these legitimate interests, but we may continue to process your personal data if there are compelling reasons to do so.

If we need to use information about your health (or other very personal and private information), we may ask your consent. However, sometimes there may be reasons of public interest or law that enable us to use this information without consent, for example, for the purposes of making a determination in connection with your eligibility for the Plan or with any benefits that may be payable under the Plan. If we have asked for and you have given us your consent, you can withdraw your consent at any time by using the details below. However, if we do not hold the data necessary to administer your benefits, we may not be able to pay out the benefits you are entitled to.

What kind of personal information do we process?

The categories of personal data that the Trustee processes includes, but is not limited to:

- Biographical information about you your name, address, date of birth, marital status as well as details of your children or other beneficiaries.
- Employment information like details of your salary history, membership dates and any contributions to your pension plan.
- Tax information like your National Insurance number and details about your tax status.

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- Financial information like your bank account details (if you are a pensioner).
- Sensitive information such as information about your health, but only where this is necessary to pay you benefits under the Plan (for example, if you have applied for ill health early retirement)

Who do we collect information about, and how?

The Trustee will collect and process personal information about:

- Deferred pensioners;
- Pensioners (including those in receipt of dependants or spouses pensions)
- Former members/pensioners with no further entitlement under the Plan;
- Ex-spouses participants;
- Non-members who will or may receive benefit from the Plan (for example, on the death or divorce of a member);
- Non-members who have received benefits from the Plan and have no further entitlement; and
- Non-members who have submitted enquiries.

Some of this information is collected directly from the individuals themselves – for example, when they retire from the Plan – while other information is collected from the Plan’s sponsoring employer, from third parties such as HMRC or tracing agencies.

How we might use your information?

The Trustee will use information held about you in order to administer the Plan. In particular we will use personal data in order to:

- Issue communications and information (whether through us or through third parties);
- Respond to member and third party queries and disputes;
- Calculate and pay benefits (including pension, lumps sums and transfer values) from the Plan;
- Establish eligibility for benefits (including following divorce or death of a member, or in cases of ill health or early retirement);
- Pay tax charge and monitor whether allowances are exceeded and report to HMRC (including compliance with anti-money laundering duties, if applicable);
- Ensure compliance with contracting our requirements;
- Prepare Plan accounts, audits and/or TPR Scheme returns;
- Carry out actuarial valuations and calculations;
- Decide or advise upon the investment of pension scheme assets and to implement investment decision;
- Obtain or prepare quotes for annuities or other insurance products;
- Demonstrate our past compliance with our duties;
- Establish your identity;
- Pay fees and expenses owed; and

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- Carry out the general administration functions of the Plan (for example, to ensure documentation is properly executed and drafted, conflicts of interest are identified and managed and/or appropriate records are maintained).

Who we might share your information with

The Trustee may from time to time be required to share this data with the administrators of the Plan, the Plan Actuary, regulatory bodies or other professional advisers in order to manage your benefits and comply with legislative requirements.

The Trustee may also share the personal data with the sponsoring employers or with insurers, for reasons such as buying out pension benefits with an insurer, undertaking incentive and other liability management exercises to ensure your benefits under the Plan are properly protected.

In certain circumstances, your personal data may be processed outside of 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 statement and in accordance with safeguards required by applicable laws.

How long will we store your information?

The Trustee will hold and process your data for as long as we are legally required to do so, are responsible for payment of benefits from the Plan, or for protection of our legitimate interests, and in line with regulatory requirements. As pension benefits are a long-term undertaking and queries can arise many years into the future, it is not possible to provide a specific period that the data will be stored.

Individual Rights

You have a number of rights under the Regulations that the Trustee will ensure you are able to exercise. These include:

- You have the right to make a subject access request which may be free and which can be made electronically.
- You have the right to make a subject access request to verify the lawfulness of the processing we are carrying out;
- You can request to correct your personal data if it is inaccurate, incomplete, or out of date, or request for your personal data to be erased;
- You may obtain your personal information from us, except in limited circumstances;

If you are not happy about the way we have used your personal information, you can bring a complaint to the Trustee by contacting us at any time. You can also bring a complaint to the Information Commissioner’s Office, whose details are below.

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Contact us

If you have any comments or queries about the way the Trustee uses your information, or if you wish to make a complaint, you can contact us using the following details.

All complaints of dissatisfaction will also be processed in accordance with the Trustee’s Complaints Process and should be sent to:

Trustee of the NCR (Scotland) Pension Plan
c/o Dalriada Trustees Limited
46 New Broad Street
London
EC2M 1JH
NCRTrustee@dalriadatrustees.co.uk

Without prejudice to any administrative or judicial remedy, you have the right to lodge a complaint to the supervisory authority, the Information Commissioner, if you consider that the processing of your personal data infringes the principles of the Regulations. The Information Commissioner’s website can be found at www.ico.org.uk or you can call their helpline on 0303 123 113.