

AQA Pension Scheme - Privacy Notice

This Privacy Notice has been issued by AQA Pension Scheme Trustees Limited ("**we**" or the "**Trustees**") as Trustees of the AQA Pension Scheme (the "**Scheme**") to comply with the UK General Data Protection Regulation ("**UK GDPR**") and Data Protection Act 2018. As a result of recent guidance from the UK Information Commissioner's Office ("**ICO**") and changes to the legislation surrounding the collection and use of personal data following the UK's withdrawal from the European Union, the Trustees have reviewed their policy regarding the storing of members' personal data in order to provide you with more details.

Data controllers

The Trustees of the Scheme are AQA Pension Scheme Trustees Limited. The Scheme Actuary to the Scheme is Colin Smith of Willis Towers Watson. In accordance with guidance issued by the ICO and the Institute and Faculty of Actuaries, the Trustees and Scheme Actuary of the Scheme are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the UK GDPR.

The Trustees can be contacted as follows:

Barnett Waddingham LLP, First Floor, City Square House, 11 Wellington St, Leeds LS1 4DL

Email: AQA@Barnett-Waddingham.co.uk

Telephone: 0333 11 11 222

Further information about the way Willis Towers Watson uses personal data when providing actuarial services to UK pension schemes is available at <https://www.wtwco.com/personal-data>.

Collection and use of your personal data

In the course of running the Scheme, we may require information from you that will be used by the Scheme's administrators to determine the benefits payable to you and your beneficiaries. Your personal data is provided to us as data controllers by your employer or may be obtained directly from you. This may include information relating to your employment, your salary and your benefits, to the extent relevant to your pension and related arrangements. Periodically, the Trustees may collect personal data relating to you from third parties such as former employers or regulatory authorities. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme.

As such, we may collect, hold and use any or all of the following items of personal data about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, marital status, postal and/or email address and telephone number, contributions to the Scheme, salary and data relating to investments and personal assets held outside of the Scheme.
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

In addition, we may collect, hold and use the following category of personal data about you that is of a sensitive nature ("**Special Categories Personal Data**"):

- Descriptions relating to your or your spouse's or civil partner's physical and mental health or sexual orientation (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme or benefits payable on your death).

Where we are required to process other Special Categories Personal Data, we will approach you for explicit consent to the processing of such data unless the processing is necessary for the purposes of carrying out our obligations and rights in the field of employment and social security law.

Sharing of your personal data and the purposes for which your personal data will be processed

The Trustees may share your personal data with:

- the sponsoring employer(s),
- the Scheme's Administrator (currently, Barnett Waddingham LLP),
- the Scheme Actuary (currently, Willis Tower Watson),
- the Scheme Auditor (currently, RSM UK),
- IT specialists,
- the Scheme's legal adviser (currently, Mayer Brown International LLP),
- pension consultants and other professional advisors,
- insurance companies securing benefits under the Scheme (Rothesay Life Plc) and other counterparties in the event of a buy-in or buyout of the benefits under the Scheme, and
- regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions, the Pensions Ombudsman, and the Pensions Regulator).

Your personal data may be shared by the Scheme Administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive.

The list of recipients is not exhaustive, and we may from time to time need to share personal data with other third parties in order to administer the Scheme and pay benefits, for example if we engage a different service provider. We will update this statement if the categories of recipients change.

The Scheme Administrator, on behalf of the Trustees, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustees' obligation to run the Scheme in accordance with the Trust Deed and Rules. The Trustees and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

The primary purpose of the Scheme Actuary having your personal data is to advise the Trustees on the financial management of the Scheme. This advice helps to ensure the Trustees are able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004. Further details on how the Scheme Actuary uses your personal data is available at: <https://www.wtwco.com/personal-data>.

The legal basis upon which we will process your personal data

The Trustees will process your personal data and the personal data of other persons (e.g. your dependants) provided by you to the Trustees in connection with the administration of your account and related benefit entitlements arising as a result of your membership of the Scheme. The purposes for which the Trustees will process personal data, and the legal basis on which the processing is performed, are as set out in the table below:

Processing purpose	Types of personal data	Legal basis for processing
Administering the Scheme in accordance with its Trust Deed and Rules, applicable law and the terms of our insurance policy (including by keeping up to date and accurate records about your membership of the Scheme so that the correct benefits can be paid, and sharing your personal data with Rothesay	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details	We have a legitimate interest in administering the Scheme in accordance with its governing documents, applicable law, and terms of our insurance policy

Processing purpose	Types of personal data	Legal basis for processing
Life Plc for purposes of securing benefits under the Scheme)	- other relevant information provided to us Information provided by your employer and third parties: - National Insurance number - payroll records and tax status information - information relating to your employment, salary, contributions and benefits - other relevant information provided to us	
Determining your eligibility to receive benefits under the Scheme	Information provided by you: - name - date of birth - gender - marital status - National Insurance number - length of employment - details of dependants - other relevant information provided to us Information provided by your employer and third parties: - National Insurance number - payroll records and tax status information - information relating to your employment, salary, contributions and benefits - other relevant information provided to us	We have a legitimate interest in determining whether you are eligible for receiving benefits under the Scheme
Determining the benefits payable to and in respect of you and paying the correct benefits on time to the correct recipient	Information provided by you: - name - date of birth - gender - marital status - bank account details - National Insurance number - length of employment - details of dependants - contact details - other relevant information provided to us Information provided by your employer and third parties: - National Insurance number - payroll records and tax status information - information relating to your employment, salary, contributions and benefits - other relevant information provided to us	We have a legitimate interest in paying the correct benefits on time to the correct recipient in accordance with the Trust Deed and Rules of the Scheme
Investing your contributions in line with your wishes, or in compliance with a default arrangement	Information provided by you: - name - date of birth - length of employment - other relevant information provided to us (such as your investment instructions)	We have a legal obligation to ensure that your contributions are invested in accordance with the Rules of the Scheme and applicable law

Processing purpose	Types of personal data	Legal basis for processing
	Information provided by your employer and third parties: • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	
Communicating with you about the Scheme and your benefits	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by your employer and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in communicating with you about the Scheme and your benefits
Establishing, exercising and defending our legal rights	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by your employer and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in establishing, exercising and defending our legal rights
For audit, compliance and other risk management	Information provided by you: • name • date of birth • gender • marital status • bank account details	We have a legitimate interest in auditing the Scheme and ensuring that it is managed properly

Processing purpose	Types of personal data	Legal basis for processing
	- National Insurance number - length of employment - details of dependants - contact details - other relevant information provided to us Information provided by your employer and third parties: - National Insurance number - payroll records and tax status information - information relating to your employment, salary, contributions and benefits - other relevant information provided to us	
Considering any potential beneficiaries of death benefits under the Scheme	Personal data of potential beneficiaries: - name - date of birth - marital status - contact details - other relevant information provided to us	We have a legitimate interest in selecting beneficiaries of your death benefits under the Scheme

Where the Trustees are required to process Special Category Personal Data they will approach you or the relevant individuals for specific consent to the processing of such data, as set out in the table below:

Processing purpose	Types of Sensitive Personal Data	Legal basis and special condition for processing
Considering your entitlement to an ill health pension.	Health information	We have obtained your explicit consent to process your health data.

Retention of your personal data

Your personal data will be retained for as long as may be necessary to fulfil the purposes we collected it for as described above (*See: Sharing of your personal data and the purposes for which your personal data will be processed*).

The Trustees will hold your personal data and that of your dependants for as long as may be necessary in order to administer benefit entitlements and for the purposes of maintaining records of steps the Trustees have taken to comply with their obligations under the Scheme. Inevitably, this means that personal data may be retained by the Trustees for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased. The end date for holding data in respect of a particular beneficiary is expected to be 15 years from the date on which the Scheme is terminated. Should you require details of the retention periods for the different aspects of your personal data please contact the Scheme Administrator at the address above.

In determining the appropriate retention period, the Trustees will take into consideration statutory requirements and industry guidelines, nature and sensitivity of the personal data, the purposes for which it was collected, how the data is stored and the potential risk from unauthorised use or disclosure of personal data.

International transfer of your personal data

Your personal data will not normally be stored in or transferred overseas to a country outside the United Kingdom which does not offer adequate protection according to English law. However, if the Trustees decide that personal data does need to be transferred to such a country, the Trustees will notify you in writing and ensure that appropriate technical and organisational measures are put in place so that such processing meets the requirements of the data protection legislation. We may safeguard such transfers through the use of Standard Contractual Clauses or International Data Transfer Agreements which have been approved for this purpose in accordance with applicable data protection law. If you wish to obtain a copy of these Standard Contractual Clauses, contact the Scheme Administrator at the address above. If the Trustees cannot ensure such an adequate level of data protection, your personal data will not be transferred outside the United Kingdom unless one of the limited exceptions under data protection law applies.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means. In the event that this position changes, we will notify you in writing.

Your rights in relation to your personal data

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. This right always applies. However, there are some exemptions which mean you may not always receive all of your personal data that we process. If you wish to request copies of your personal data please contact Scheme Administrator at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete. This right always applies.
- You have the right to have your personal data deleted or removed in certain circumstances, for example, if there is no reason for its continued storage and processing.
- You have the right to restrict the processing of your personal data in certain circumstances, for example, if you want us to establish its accuracy or the reason for processing. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- The right to object to your personal data being processed where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing).
- You have the right to request the transfer of your personal data, which you have given us, to another party. This right only applies where we rely on your consent to process your personal data.

Where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent at any time. Once we receive notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal.

You are not under any statutory or contractual requirement to provide your personal data to us. However, please note that if you withdraw your consent, request your personal data to be deleted, or restrict or object to our processing, then the Trustees may not be able to process personal data and your benefits could be affected.

You have the right to make a complaint about the handling of your personal data (or the personal data of someone on whose behalf you are acting) through our Data Protection Complaints Procedure. If you wish to make such a complaint, please contact:

Barnett Waddingham LLP, First Floor, City Square House, 11 Wellington St, Leeds LS1 4DL
Email: AQA@Barnett-Waddingham.co.uk
Telephone: 0333 11 11 222

We will acknowledge your complaint within 30 days and will keep you informed while it is being investigated.

You also have the right to lodge a complaint with the ICO.

Further details about UK GDPR and your rights under UK GDPR can be found on the ICO's website at <https://ico.org.uk/>.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice and any other relevant policies or procedures at any time. Any changes we may make to this Privacy Notice in the future will be notified to you. Any changes we make to this Privacy Notice (which will, unless otherwise indicated, apply to any personal data already obtained by us before the changes were made) will be effective from the date on which those changes have been notified to you.