

The Schools of King Edward the Sixth in Birmingham Retirement Benefits Scheme - Privacy Notice

This Privacy Notice has been issued by the Trustee and Scheme Actuary of The Schools of King Edward the Sixth in Birmingham Retirement Benefits Scheme (the Scheme) to comply with the General Data Protection Regulation (GDPR), which came into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controllers

The Trustee of the Scheme is Vidett Trust Corporation Limited, represented by Azka Ali. The Scheme Actuary to the Scheme is Mr Stephen Kyte FIA of Barnett Waddingham LLP.

In accordance with guidance issued by the Information Commissioner's Office (ICO) and the Institute and Faculty of Actuaries (IFoA), the Trustee and Scheme Actuary of the Scheme are considered "data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR.

The data controllers can be contacted as follows:

The Schools of King Edward the Sixth in Birmingham
Foundation Office
Edgbaston Park Road
Birmingham, B15 2UD

Telephone: 0121 472 1147

Use, transfer and storage of personal data

In the course of running the Scheme we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme).
- Salary and data relating to investments and pension assets held outside of the Scheme (for example to the extent they are relevant in relation to taxation of your pension income).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

In addition, we may require information from you in relation to your marital status and / or information about you or your partner's health. Such information will be used by the Scheme's administrators to determine the benefits payable to you and your beneficiaries.

Your personal data is provided to the data controllers by the Foundation or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme.

We store your personal data until such time as we will no longer need it. 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 decide to delete some of the data held in relation to you after 7 years. 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 after that time.

The Trustee shares your data with the Scheme's administrator (Barnett Waddingham LLP), the Scheme Actuary, the Foundation and the Scheme's AVC providers (in respect of AVC members only). They may also share data with the Trustee's other professional advisers (including the Scheme Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and The Pensions Regulator),

insurers and where applicable, their counterparties (such as reinsurers) and brokers who are typically involved in arranging such insurance for the purpose of purchasing annuities or other insurance products.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address / existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustee's formal data mapping document, available on request in writing to the Data Controllers at the address above.

The Scheme administrators, on behalf of the Trustee, 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 Trustee's **legal obligation** to run the Scheme in accordance with the Trust Deed and Rules. The Trustee and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries. In addition, it is in your and the Trustee's **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme so that the correct benefits can be paid.
- Undertake risk-management exercises so that the risk your benefits are not paid is reduced.
- Comply with the law, including regulations and guidance issued by The Pensions Regulator so that you, the Trustee and its advisers are not subject to legal sanctions which may impact benefits.

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet its obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

The Trustee has conducted due diligence on its suppliers to ensure they process data within the UK and/or the EEA.

Your personal data will not be directly transferred to another country unless you request for this to be done.

Your rights in relation to your 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. If you wish to request copies of your personal data please contact the data controllers at the address above.
- Have your personal data rectified if it is inaccurate or incomplete.
- Have your personal data deleted or removed if there is no reason for its continued storage and processing.
- Object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. 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.
- Lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform its duties in relation to the Scheme, and your benefits could be affected.

If you have any concerns about how we use your personal data, you may raise a complaint with us using the contact details set out above. We will investigate and respond in accordance with our complaints handling process. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

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