

# UNIVERSITY OF READING PENSION SCHEME

## Privacy Notice

### Introduction and Purpose

This Privacy notice sets out the basis on which the University of Reading Pension Scheme Trustees ("Scheme", "Trustees", "we", "our", "us") collects, uses and protects the personal information we hold and how we comply with the data protection regulations.

Specifically, this Privacy Notice explains:

- the Trustees' contact information and their representatives;
- what information we collect
- how we use that information
- how will we protect personal information
- how you can access your personal information
- changes to our Privacy Notice
- how to contact us.

### Details of Trustees and Contact Information

The Trustees are the overall data controllers for the Scheme and are responsible for deciding the purpose for which the personal data of members of the Scheme is processed. Members include both active and deferred members as well as potential beneficiaries (non-members).

The Secretary to the Trustees is Miss Stephanie May and the Trustees may be contacted via the Secretary to the Trustees:

Miss Stephanie May  
Secretary to the Trustees  
University of Reading  
PO Box 217  
Reading  
RG6 6AH

### Data Processing: Lawful Basis for Processing

Our use of your information as described in this Privacy Notice is permitted by applicable data protection law because it is:

- necessary for our legitimate interests in pursuing the purposes set out in this Privacy Notice, and, when we make disclosures to your (current or former) Scheme employer for the audit and corporate transaction purposes referred to below, necessary for the legitimate interests of that entity, such interests in each case not being overridden by your privacy interests;

- in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below;
- in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or, where the processing relates to personal data, manifestly in the public domain; or
- in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the Scheme rules require you to provide information which we cannot otherwise process without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to administer your contributions and benefits or record or calculate or pay your or your beneficiaries' benefits.

## What information we collect

When your employer enrolled you into the Scheme, they provided us with personal information as required by law.

Additionally, we may also receive information from third parties. This could be from the Scheme administrator (which is currently Aviva) if you have contacted them directly or other pension schemes if you are transferring benefits. They could also include other third parties such as health professionals if you become seriously ill or tracing agencies if we are no longer able to contact you.

The information provided by you, your employer or by third parties in order to manage the University of Reading Pension Scheme could include personal information about you or your family. For instance, in some cases we also collect information about your nominated beneficiaries, dependants or next of kin (for example, when you submit an Expression of Wish form). **Before providing us with any such information, you should provide a copy of the information in this Privacy Notice to those individuals. We assume that you have the right to share any personal information you provide to us about them.**

The information that we collect and process about you consists of:

- name and identification details such as National Insurance number, employee number, date of birth, full name, sex, nationality and country of residence;
- contact details such as telephone number, postal address, email address(es);
- bank account details, financial and pay details;
- your earnings and pensionable earnings, benefit options you have selected, the category and value of benefits that you have built up or receive and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders (including information in divorce or dissolution certificates), tax protections or other adjustments;
- dates of employment and pension scheme membership including start and leave dates and dates of contract changes, your member identifying number (which is assigned to you by the administrator);
- job title(s), contractual arrangements during employment / work for the University of Reading or Southern Universities Management Services;
- records of communications with you (including any complaints); and
- in some cases, special categories of personal data such your marital status (and indirectly sexuality), or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

## How we use that information

We need to process information about you in order for us to manage the Scheme effectively. We also use your information to comply with our legal obligations towards members of the Scheme and for Scheme governance as required by legislation, including for auditing and reporting purposes.

Other purposes for which we may need to process your information include:

- calculate and pay pension benefits due to you at the correct time;
- select suitable investment choices for you;
- prepare and send relevant communications to you, including in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;
- to notify you about any changes that are of relevance;
- for internal record keeping;
- to analyse and improve activities, services and information given to members;
- to comply with legal, regulatory and trustee governance obligations and good practice and investigating or preventing crime;
- for administrative reasons, such as recording start and leave dates, salaries, absences, recording benefits,;
- for gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests and to investigate complaints;
- to monitor and manage staff access to pension relevant systems and facilities;
- for reviews we or our administrators conduct for statistical and reference purposes;
- for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you and to prevent fraud;
- when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as obtaining life insurance, insuring liabilities with an insurer, mergers, bulk transfers, flexible retirement options.

## Who we share your information with

We typically share or disclose your information (and, where necessary, that of your spouse, partner and/or any dependants) to the following recipients as necessary to administer the Scheme or to comply with legislative requirements:

- Aviva, the Scheme's administrator and BlackRock, the former administrator;
- the University of Reading (or Southern Universities Management Services as appropriate) as the sponsoring employer;
- other suppliers and service providers, including annuity advisers, medical practitioners (appointed by the University of Reading) in relation to ill-health early retirement applications, providers of printing and communication services (as appointed by Aviva (currently MBA) or the University of Reading), IT and hosting and tracing services, and death in service insurers (currently Aviva)
- legal advice (currently Linklaters LLP), trustee secretarial services (currently provided by the University of Reading pensions team), pensions consultancy (currently Mercer Limited) and investment advice (currently Barnett Waddingham LLP) and audit services (currently KPMG);
- regulatory bodies and law enforcement agencies;
- any new pension provider to which you choose to transfer your URPS benefits, ;
- insurance and reinsurance companies;
- other persons from time to time when the disclosure is needed to exercise or protect our legal rights, including the rights of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others. This may

include the Pensions Ombudsman, the police or by order of the court if, for example, there is suspected or actual criminal activity involving the Scheme.

Please note that when we share information with our suppliers and service providers, we take steps to ensure they meet our data security standards, so that your personal data remains secure.

The use and disclosure of your information for the purposes referred to above may, exceptionally, involve transferring your information to countries outside of the European Economic Area.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected in compliance with applicable data protection rules. To ensure an appropriate level of protection, for example a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom. Further details of these transfers and copies of these agreements are available from us on request.

For the avoidance of doubt, if you live outside the EEA we will transfer your information outside the EEA in order to pay your benefits. If this is relevant to you, we may also transfer your information outside the EEA in order to trace you if we lose contact with you, or to confirm your continuing entitlement to benefits. We will ensure that we continue to protect your information in these cases.

## How long we will keep your information

We will keep your information for the longer of: (i) the period required in order to meet our legal or regulatory responsibilities; and (ii) the period envisaged within our data retention policy.

We will decide the retention period having regard to the Scheme's operational and legal requirements, such as: facilitating the payment of benefits to you or your nominated beneficiaries; calculating and managing the liabilities of the Scheme; and responding to legal claims or regulatory requests. In many cases, we will keep your information for 12 years after ceasing entitlement to benefits. Data held by Aviva on behalf of the Trustees will be destroyed as follows:

- 5 years after an auto-enrolled individual has opted out;
- 7 years following the date on which an individual has transferred all of their benefits out of URPS;
- 7 years after a member has taken all of their benefits as cash.

## Changes to our Privacy Notice

This Privacy Notice will be posted on the University of Reading Pension Scheme web page: <http://www.reading.ac.uk/internal/humanresources/WorkingatReading/Pensions/humres-URPS.aspx> at all times. We may update the Privacy Notice from time to time. If any changes are made to the Privacy Notice, it will be posted on this page and/or brought to your attention in a way which is appropriate, having regard to the way in which we normally communicate with you. We advise that you check back frequently to see if there have been any changes.

## Your rights

You have the right to see the personal data that we hold for you and to have a copy of this data provided to you. If you believe any of the data we hold for you is incorrect or inaccurate, you may request to have the information corrected.

You can object to your data being processed, although we can override your request if the data is required for legislative purposes/legitimate interests. If you object to your data being processed or you would like to have your details deleted altogether, and we are able to agree to the request, it may impact our ability to administer your benefits.

In some circumstances, you also have the right to require certain personal data to be transferred to you or a named third party.

There is generally no charge to you to exercise any of these rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

You can exercise any of these rights by contacting us at the address set out at the beginning of the Privacy Notice.

In limited circumstances your personal data is processed on the basis of your consent. To the extent this applies, you have the right to withdraw your consent to the use of your information. You can notify us of your withdrawal of consent by contacting us at the address set out at the beginning of the Privacy Notice.

You can also lodge a complaint about our processing of your personal information with a supervisory authority in the EU Member State where you habitually reside or work, or where a breach has taken place. Details for the office of the Information Commissioner in the UK are available at <https://ico.org.uk/>.

Last updated: 15 August 2018