

# UNIVERSITY OF READING PENSION SCHEME

## Privacy Policy

### Introduction

We are the Trustees (“we”, “us” or “our”) of the University of Reading Pension Scheme (the “Scheme”). To fulfil our obligations to you and to ensure that you receive your pension, we collect, use and share personal information about our active, deferred and pensioner members (“Members”, “you” or “your”), as well as Members’ dependants and nominated beneficiaries.

This privacy policy (“Privacy Policy”) explains what information we collect about you, how we use it, who we share it with and how long we retain it. We have also provided information about your rights in respect of the personal information we collect about you and how to contact us.

We also set out in this Privacy Policy our key obligations under applicable data protection law, including the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018 (“DPA”). The UK GDPR and the DPA are the main data protection laws that apply to us. For ease of understanding this Privacy Policy, we use the term “personal information” throughout, which we use to mean the same as the term used in the UK GDPR, “personal data”.

You can read, print and save this Privacy Policy. We use sub-headings to help you find specific information that you may be looking for more easily.

### Data Controller

The Trustees are the overall data controllers of any personal information collected or used in connection with the Scheme. This means we are responsible for deciding the purpose for which, and the means by which, your personal information is processed.

### Contacting us

If you have any questions about this Privacy Policy or if you would like more information, please contact us via the Secretary to the Trustees at the address below, or email us at [pensions@reading.ac.uk](mailto:pensions@reading.ac.uk).

Secretary to the Trustees  
University of Reading  
PO Box 217  
Whiteknights  
Reading  
RG6 6AH

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## Personal information we collect from or about you, why we use it, and where we get it from

### Personal information we collect about you

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 section sets out the personal information we collect from or about you, as well as the source of that information.

Category	Details	Source
General information	<ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>Date of birth</li> <li>National insurance number</li> </ul>	You
Contact information	<ul style="list-style-type: none"> <li>Home address (including country of residence and postcode)</li> <li>Telephone number</li> <li>Email address</li> </ul>	You, Department for Work and Pensions, insurers, tracing agencies
Professional information	<ul style="list-style-type: none"> <li>Employer</li> <li>Campus/Department</li> <li>Role</li> <li>Retirement date</li> </ul>	You, your employer
Bank information	<ul style="list-style-type: none"> <li>Account details</li> <li>Financial information</li> </ul>	You, insurers
Benefits information	<ul style="list-style-type: none"> <li>Member identifying number</li> <li>Scheme joining and leaving dates</li> <li>Contributions</li> <li>Your earnings and pensionable earnings</li> <li>Scheme category (e.g. deferred member)</li> <li>Value of contributions and benefits that you receive</li> <li>Tax protections and other adjustments</li> </ul>	You, insurers, your employer

Category	Details	Source
	<ul style="list-style-type: none"> <li>Any relevant matters affecting your benefits such as additional voluntary contributions</li> </ul>	
Correspondence (including complaints)	<ul style="list-style-type: none"> <li>Letters and emails from you or us</li> <li>Records of other communications</li> </ul>	You, insurers

### **Special category personal information**

We collect and process the following "special categories" of personal information about you.

Category	Details	Source
Relationship information	<ul style="list-style-type: none"> <li>Marital status</li> <li>Relationship of beneficiary</li> <li>Marriage and birth certificates</li> <li>Pension sharing orders (including divorce and dissolution certificates)</li> </ul> <p>Note that any relationship information may disclose your sexual orientation.</p>	You, tracing agencies
Health information	<ul style="list-style-type: none"> <li>Information about ill health causing earlier retirement</li> <li>Outcomes of ill-health reviews</li> <li>Incapacity or similar</li> </ul>	You, medical professionals

### **Beneficiaries**

We collect the following personal information from you about your nominated beneficiaries, dependants and next of kin:

Category	Details	Source
Beneficiary information	<ul style="list-style-type: none"> <li>Name</li> <li>Spouse's date of birth</li> <li>Contact information</li> <li>Beneficiary status and entitlement</li> </ul>	You, tracing agencies

Category	Details	Source
	<ul style="list-style-type: none"> <li>• Bank information</li> <li>• Spouse gender</li> </ul>	

### **Why we use your personal information, and our legal basis for doing so**

We use your personal information to provide services to you, to pay your pension, and for the wider administration of the Scheme. If necessary, we also use your information to fulfil the Trustees' legal obligations and exercise the Trustees' legal rights in relation to the Scheme.

We must identify a lawful basis for our use of your personal information. For example, it is in our legitimate interests to ensure the successful functioning of the Scheme, and that you receive any Scheme benefits to which you are entitled. We also rely on our use of your information being necessary to fulfil our legal obligations as Trustees in respect of the Scheme. We are under a legal duty to manage the Scheme on behalf of its Members and beneficiaries.

If we use your "special category" personal information, we must identify an additional lawful basis that is specific to that special category personal information. Normally, this will be your explicit consent, but we will also use special category personal information if necessary to comply with social security and social protection law.

The table below sets out in more detail how we use your personal information, and our lawful bases for doing so.

Purpose / activity	Information we use	Lawful basis / condition
Record your contributions, track entitlements and pay benefits	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Contact information</li> <li>• Professional information</li> <li>• Bank information</li> <li>• Benefits information</li> <li>• Beneficiary information</li> <li>• Correspondence</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligations</li> <li>• Consent</li> </ul>
	<ul style="list-style-type: none"> <li>• Relationship information</li> <li>• Health information</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> <li>• Substantial public interest in making a determination in connection with the Scheme</li> </ul>
Make payments to your beneficiaries and confirm their entitlement to benefits	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Professional information</li> <li>• Benefits information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligations</li> <li>• Consent</li> </ul>

Purpose / activity	Information we use	Lawful basis / condition
	<ul style="list-style-type: none"> <li>Beneficiary information</li> </ul>	
	<ul style="list-style-type: none"> <li>Relationship information</li> <li>Health information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Substantial public interest in making a determination in connection with the Scheme</li> </ul>
Member tracing and locating you if you move address without providing us with new contact details	<ul style="list-style-type: none"> <li>Personal information</li> <li>Contact information</li> <li>Professional information</li> <li>Bank information</li> <li>Benefits information</li> <li>Beneficiary information</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Legal obligations</li> <li>Consent</li> </ul>
	<ul style="list-style-type: none"> <li>Relationship information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>
<p>Communicating with you and your beneficiaries in relation to your contributions, entitlements and benefits</p> <p>Communicating with you to provide you with updates about the Scheme and obtain your feedback about its operation</p>	<ul style="list-style-type: none"> <li>Personal information</li> <li>Contact information</li> <li>Professional information</li> <li>Benefits information</li> <li>Beneficiary information</li> <li>Correspondence</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Legal obligations</li> <li>Consent</li> </ul>
	<ul style="list-style-type: none"> <li>Relationship information</li> <li>Health information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>
Liability management	<ul style="list-style-type: none"> <li>Personal information</li> <li>Professional information</li> <li>Benefits information</li> <li>Beneficiary information</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Legal obligations</li> </ul>
	<ul style="list-style-type: none"> <li>Relationship information</li> <li>Health information</li> </ul>	<ul style="list-style-type: none"> <li>Social security and social protection law</li> </ul>
Develop and improve the Scheme's systems	<ul style="list-style-type: none"> <li>Personal information</li> <li>Contact information</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>

Purpose / activity	Information we use	Lawful basis / condition
	<ul style="list-style-type: none"> <li>• Professional information</li> <li>• Benefits information</li> <li>• Beneficiary information</li> </ul>	
Conducting elections and elect trustees	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Contact information</li> <li>• Benefits information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Preventing and detecting fraud and other crime	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Contact information</li> <li>• Professional information</li> <li>• Bank information</li> <li>• Benefits information</li> <li>• Beneficiary information</li> <li>• Correspondence</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligations</li> </ul>
	<ul style="list-style-type: none"> <li>• Relationship information</li> <li>• Health information</li> </ul>	<ul style="list-style-type: none"> <li>• Substantial public interest in preventing and detecting crime</li> <li>• Substantial public interest in preventing fraud</li> </ul>
Meeting ongoing regulatory and compliance obligations	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Contact information</li> <li>• Professional information</li> <li>• Bank information</li> <li>• Benefits information</li> <li>• Beneficiary information</li> <li>• Correspondence</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligations</li> </ul>
	<ul style="list-style-type: none"> <li>• Relationship information</li> <li>• Health information</li> </ul>	<ul style="list-style-type: none"> <li>• Substantial public interest</li> </ul>
Dealing with any complaints you might make	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Contact information</li> <li>• Benefits information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>

Purpose / activity	Information we use	Lawful basis / condition
	<ul style="list-style-type: none"> <li>• Beneficiary information</li> <li>• Correspondence</li> </ul>	
Bringing and defending legal claims	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Contact information</li> <li>• Professional information</li> <li>• Bank information</li> <li>• Benefits information</li> <li>• Beneficiary information</li> <li>• Correspondence</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
	<ul style="list-style-type: none"> <li>• Relationship information</li> <li>• Health information</li> </ul>	<ul style="list-style-type: none"> <li>• Establishment, exercise or defence of legal claims</li> </ul>
Management of our internal systems processes and our use of technology, including testing and upgrading of systems	<ul style="list-style-type: none"> <li>• Personal information</li> <li>• Benefits information</li> <li>• Beneficiary information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>

You are not under a legal obligation to provide us with any of your personal information, but if you elect not to provide us with your personal information, we may be unable to provide services to you or your beneficiaries.

The information provided by you, your employer or by third parties to manage the Scheme includes personal information about you or your family (nominated beneficiaries, dependants or next of kin). Before providing us with any such information, you should provide a copy of the information in this Privacy Policy to those individuals. We assume that you have the right to share any personal information you provide to us about them.

## Disclosing, sharing and transferring personal information

We use third party service providers to fulfil our obligations as Trustees, and to provide our services to you and your beneficiaries. For example, in addition to sharing your personal information for the purposes of providing your benefits, we may have to share your personal information with official authorities such as the Pensions Regulator and the Pensions Ombudsman. We may also share your personal information where necessary for the restructuring or reorganisation of the Scheme.

We use contracts with service providers to restrict how they can use your personal information.

The table below indicates categories of organisations to whom we may disclose your personal information, the reason we disclose that personal information, what personal information is shared with them, and where these organisations are located.

Categories of Organisation	Purpose	Lawful basis	Information shared	Location to which personal information is transferred
Scheme administrator <i>Aviva</i>	To enable the Scheme administrator to administer the Scheme.	Legitimate interests in ensuring that the Scheme is correctly and efficiently administered.	All data types listed in the "Personal information we collect from or about you" section above.	UK EEA Any other applicable jurisdiction.
AVC providers <i>Aviva</i>	To enable members to make additional voluntary contributions further to enrolment in the Scheme.	Consent.	General information, Contact information, Professional information, Bank information, Benefits information, Beneficiary information.	UK EEA Any other applicable jurisdiction.
Pension tracing service providers	To trace details of members' previous pensions under other schemes.	Our legitimate interests in ensuring that members' information and pension amounts are up to date.	General information, Contact information, Professional information, Bank information, Benefits information, Beneficiary information	UK EEA Any other applicable jurisdiction.

<b>Categories of Organisation</b>	<b>Purpose</b>	<b>Lawful basis</b>	<b>Information shared</b>	<b>Location to which personal information is transferred</b>
Medical practitioners <i>Cordell Health</i>	To assess applications for ill-health early retirement.	Our legitimate interests in ensuring the validity of ill-health early retirement applications.	General information, Contact information, Health information, Relationship information.	UK EEA Any other applicable jurisdiction.
Printing and communication service providers	To communicate important details and updates to our Members.	Our legitimate interests in keeping Members up to date and complying with our legal obligations.	General information, Contact information, Professional information.	UK EEA Any other applicable jurisdiction.
IT and hosting service providers	To support and maintain the IT software and infrastructure we use.	Our legitimate interests in ensuring we have adequate assets to support our business and to protect our proprietary information and information about our customers, suppliers and staff.	All data types listed in the "Personal information we collect from or about you" section above.	UK EEA Any other applicable jurisdiction.
Death in service insurers <i>Unum</i>	To support the administration and management of the Scheme and ensure the proper payment of Members' Scheme entitlements (currently Unum).	Our legitimate interests to ensure the Scheme can pay Members' Scheme entitlements appropriately and promptly.	All data types listed in the "Personal information we collect from or about you" section above.	UK EEA Any other applicable jurisdiction.

Categories of Organisation	Purpose	Lawful basis	Information shared	Location to which personal information is transferred
Professional advisers <i>Mercer Limited</i> <i>Linklaters LLP</i> <i>Cooper Parry</i>	To obtain legal advice (currently Linklaters LLP), trustee secretarial services (currently provided by the University of Reading pensions team), pensions consultancy and investment advice (currently Mercer Limited) and audit services (currently Cooper Parry).	Compliance with our legal obligations  Legitimate interests in ensuring that our business is well advised about financial, legal and compliance issues.	All data types listed in the "Personal information we collect from or about you" section above.	UK EEA Any other applicable jurisdiction.
Regulatory bodies or law enforcement agencies	Administration of justice, regulatory and compliance.	Compliance with our legal obligations  Our legitimate interests in ensuring that we maintain good relationships with relevant government entities.	All data types listed in the "Personal information we collect from or about you" section above.	Any applicable jurisdiction.
Other pension providers	To enable Members to transfer their Scheme benefits to a new pensions provider.	Compliance with our legal obligations  Our legitimate interests in the management of the Scheme.	All data types listed in the "Personal information we collect from or about you" section above.	UK EEA Any other applicable jurisdiction.

Categories of Purpose Organisation	Purpose	Lawful basis	Information shared	Location to which personal information is transferred
Insurance and reinsurance providers <i>Mercer Limited</i>		Our legitimate interests in the financial management of the Scheme.	All data types listed in the "Personal information we collect from or about you" section above.	UK EEA Any other applicable jurisdiction.

We would only transfer your personal information to third parties outside of the UK or European Economic Area ("EEA") if there are adequate provisions in place to ensure your privacy. For example, if the jurisdiction is not considered adequate by the relevant authorities, we put in place alternative contractual measures, including the standard contractual clauses approved under the relevant laws (approved by the UK Information Commissioner pursuant to the provisions of UK GDPR).

We may also disclose your personal information to other third parties from time to time:

- if we are under a duty to disclose or share your personal information to comply with any legal obligation or if we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets;
- to enforce or apply our terms of use and other agreements; and
- to protect the rights, property, or safety of the Scheme, our Members, or others including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## Data Retention

We will retain and process your personal information in line with the data retention principles outlined in the UK GDPR.

The Trustees will retain your personal information for the longer of (i) the period required to meet our legal or regulatory responsibilities; and (ii) up to 12 years after the death of your last beneficiary, at which time the Trustees will delete your personal information.

This reflects our need to provide your pension benefits for the lifetime of beneficiaries, including spouses, dependants, or civil partners. Destroying member records too soon could therefore result in members with legitimate rights under the Scheme being unable to prove that entitlement. As a result, the Trustee must often retain detailed records of members (and beneficiaries) for extended periods. External administrators, such as Aviva, may have longer retention periods to meet their audit and regulatory requirements.

We may anonymise your personal information, or use it for statistical purposes. We keep anonymised and statistical data indefinitely, but we take care to ensure that such data can no longer identify or be connected to any individual.

## Your Rights

The UK GDPR grants you certain rights in relation to your personal information, which we summarise in the table below:

<p><b>Right of access and data portability</b></p>	<p>You have the right of access to your personal information in some circumstances. Requests will be fulfilled within one month for straightforward requests (extendable by a further two months for complex requests, with notification).</p>
<p><b>Right of rectification or erasure.</b></p>	<p>If you feel that any personal information that we hold about you is inaccurate or incomplete you have the right to ask us to correct or rectify it. We will respond to you within one month of the request but may take up to two months to make the rectification if complex.</p> <p>You also have a right to ask us to erase information about you where you can demonstrate that the personal information we hold is no longer needed by us, if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your personal information. Your right is to erasure without undue delay. However, this right is limited by the Trustees' legal obligations and/or for the bringing or defence of legal claims. In such cases the Trustees may legally refuse a request for erasure.</p> <p>Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared your personal information about your request.</p>
<p><b>Right to restriction of processing</b></p>	<p>You have a right to request that we refrain from processing your personal information where you contest its accuracy, the processing is unlawful and you have opposed its erasure, where we do not need to hold your personal information any more but you need us to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal information. Recipients of disclosures of personal information will be informed of the restriction unless impossible or disproportionate to do so.</p>
<p><b>Right to object</b></p>	<p>You have a right to object to our processing of your personal information. This includes the right to object to the use of your information for direct marketing and profiling purposes. The Trustees will stop processing unless they have compelling legitimate grounds that override your interests, such as providing pension benefits.</p>
<p><b>Right to withdraw consent</b></p>	<p>You have the right to withdraw your consent for the processing of your personal information, to the extent that the processing of your personal information is based on consent.</p>
<p><b>Right of complaint</b></p>	<p>If you are unhappy with the way we have used or are handling your personal information you have the right to lodge a complaint with the supervisory authority for data protection issues in the country where you usually live, work or where the relevant issue arose. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance at the email set out above.</p>

These rights are not absolute, and they may not always apply in your circumstances. To exercise your rights, please contact us using the contact details set out in paragraph 2 of this Privacy Policy.

If any of your requests to exercise your rights are refused by the Trustees, you will be informed of the reasons for this decision and the information on your right to complain to the supervisory authority, which in the UK is the Information Commissioner's Office, the ICO.

Details for the ICO are available at [www.ico.org.uk](http://www.ico.org.uk).

## **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties as detailed in paragraph 5 above. Such third parties may process your personal information only on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach, and will notify you and any applicable regulator of a breach where we are legally required to do so.

## How We Keep This Privacy Policy Up to Date

This Privacy Policy was last updated in November 2025. The latest version of this Privacy Policy will be available at our website here: [URPS website](#).

We will review and update this Privacy Policy regularly and will take reasonable steps to notify you of any substantive updates to it, based on how we normally communicate with you.