

Plumbing & Mechanical Services (UK) Industry Pension Scheme: Privacy Notice

Introduction

In line with the new data protection laws that came into force in May 2018, we have made some important changes to our Privacy Policy. These not only ensure our policy is compliant but that everything we do with the information that we hold about members of the pension scheme is as clear and transparent as possible. It is very important to the Trustee that your data is and continues to be held securely and in line with all relevant legislation. This leaflet sets out further details about our revised Policy. If you have any questions in connection with the Policy, please contact us as described in 'Further information' below.

Jon Bridger
Trustee Chairman

The Trustee of the Plumbing & Mechanical Services (UK) Industry Pension Scheme (the “**Scheme**”, “**we**”, “**our**” or “**us**”) is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on what personal information about you the Scheme collects, what we do with this information, the lawful basis on which personal information is processed and what rights you have.

Collection of your information

The majority of the data we hold about Scheme members is provided to us by you or your employer. For example, it may have been provided when you joined the Scheme, during the time you were a contributing member, when you contacted us to tell us about a change in your details, or when you requested a quotation or payment of your benefits.

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone number, e-mail address, National Insurance Number, bank account details (in some cases), and country of residence;
- information relating to your benefits such as your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of benefits that you have built up or receive (including any Guaranteed Minimum Pension (GMP) entitlement as a result of being contracted-out of the State Scheme), and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments; and

- in some cases, special categories of personal data such as your marital status and details of your spouse and other family members (where such information reveals your sexual orientation), 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.

If any benefits are payable under the Scheme in the event of your death, we also collect information about your dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, we will collect personal information about you indirectly from other organisations and our appointed service providers, which at present include the following:

- the Scheme Administrator, Plumbing Pensions (U.K.) Administration Ltd.
- HM Revenue & Customs.
- Professional tracing agencies used to trace and confirm the identity of Scheme beneficiaries, (currently ITM Limited and Lexis Nexis)
- Legal & General (the Scheme's AVC provider).
- Members' own Independent Financial Advisers and / or legal representatives.

We are required to ensure the data that we hold about you is as accurate as possible, and have procedures in place to update our records and advise 3rd parties of any changes to your data that may be required.

How we use your information

We use your information for the following purposes:

- (a) communicating with you 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, and pension sharing orders;
- (b) for general administration of the Scheme, such as: to record and pay benefits; for reviews we or our administrators conduct for statistical and reference purposes; and for other 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;
- (c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- (d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- (e) when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as longevity hedging, insuring Scheme liabilities with an insurer, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises. including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make disclosures to your (current or former) Scheme employer for the purposes referred to below) necessary for the legitimate interests of that entity, such interests in each case not being overridden by your privacy interests;
- (ii) in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below; or
- (iii) 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;
- (iv) 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 information 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 information we may be unable to administer your contributions and benefits or record, calculate or pay you or your beneficiaries' benefits.

Disclosures of your information

We typically share your information with the following recipients:

- Our suppliers, which currently include:
 - Plumbing Pensions (U.K.) Administration Ltd (Scheme Administrators)
 - Willis Towers Watson (Scheme Actuary)
 - Linklaters (Legal Advisor)
 - Chiene & Tait (Scheme Auditor)
 - Heywood (Administration IT system provider)
 - KPMG (covenant advisor)
 - Lane Clark & Peacock (actuarial consultants for Scheme liability management)
 - Legal & General (additional voluntary contribution (AVC) provider)
 - ITM Limited and Lexis Nexis (member tracing and identity verification services)
 - Datagraphic and Wordshop (external printers)
 - Network ROI (IT support)
 - Pulsant (business continuity / disaster recovery provider)
 - CUBE (offsite data / archive file storage)
 - Greg Melville HR and Leave it to Louise (external HR and secretarial support)
 - Independent financial advisers (if you have provided authorisation)

When we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal information remains secure.

- Your (current or former) Scheme employer, such as for audit purposes, to calculate or verify the amount of any liabilities owed to the Scheme, or in relation to corporate transactions initiated by that entity;

- Insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above. The Trustee has recently entered into an insurance contract with Legal & General Assurance Society to cover the majority of the Scheme's pensions in payment;
- Public authorities, regulators or government bodies, such as HM Revenue & Customs and the Pensions Regulator including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so;
- Other persons from time to time such as the police, insolvency practitioners or debt collection agencies, when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information for the purpose referred to in (e) above may (but does not currently) involve the Trustee transferring your information directly to countries outside of the European Economic Area (EEA).

In addition, our service providers that process your personal information on our behalf may (but do not currently) transfer your personal information to countries or recipients outside of the EEA in the performance of their service to us, for example as part of a global data storage solution that they may have in place.

In such 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, we typically use a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) the relevant authority in the United Kingdom. Service providers are obliged under their contract with the Trustee to implement appropriate safeguards in order to protect your personal information when transferred outside the EEA. Further details of these transfers and copies of these agreements are available from us on request.

Retention of your information

We keep your information for the longer of:

- (a) The period required in order to meet our legal or regulatory responsibilities, and
- (b) The period envisaged within our Data Retention Policy. We determine the period envisaged within the Data Retention Policy with 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 general, we will retain your information for a period of 12 years after all entitlements to your benefits cease. For example, information will be retained for 12 years after the death of a member and their spouse or nominated beneficiaries (if any).

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal information and to restrict its processing, to tell us that you do not wish to receive communications from us, and (in some circumstances) to require certain of your information to be transferred to you or a third party. To the extent that the use of your information is based on your consent, you have the right to withdraw your consent. You also have the right to object to our processing of your personal information.

If you have any questions or wish to exercise any of the above rights, you may:

- send an email to info@plumbingpensions.co.uk. You can also use this e-mail address if you wish to make a complaint about how we process your information; or
- contact us by phone or hard copy letter as described in 'Further information' below.

In each case, when contacting us please include your name, date of birth and National Insurance Number.

You can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office (www.ico.org.uk) or, if you are no longer resident in the UK, the relevant data protection authority in your country of residence.

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

How we protect your data

Your data is held securely on the Scheme administration system. The system is accessible to authorised Plumbing Pensions (UK) Administration Ltd staff only. All staff who access the administration system receive appropriate data protection training. The Trustee ensures that appropriate data sharing agreements are in place prior to sharing your information with any third party.

Status of this privacy notice

This privacy notice will be kept under review. It was last updated in November 2020.

It may be subject to amendments. Any future changes or additions to the processing of your information as described above in this privacy notice affecting you will be updated on our website and communicated to you through an appropriate channel.

Further information

If you have any questions regarding our Privacy Policy, please do not hesitate to contact us:

The Trustee of the Plumbing & Mechanical Services (UK) Industry Pension Scheme
Bellevue House, 22 Hopetoun Street, Edinburgh, EH7 4GH

Tel: 0131 556 9090

Email: info@plumbingpensions.co.uk