

LEONI UK Pension Scheme (The Scheme) Notice to Members – Personal Data

April 2021

Introduction

This notice is intended to provide you with information about the personal data held about you which is needed to administer the Scheme and pay benefits from it. It explains the type of information collected, how it is used and who it is shared with.

In connection with this and for the purposes of the data protection laws and regulations:

- The Trustees of the Scheme are a 'data controller'.
- The Scheme Actuary, Andrew Pocock of Lane Clark & Peacock LLP (LCP) is also a data controller in respect of your personal data that he uses to carry out his functions. For further information please see <https://www.lcp.uk.com/privacy-policy/>.
- LCP when acting in the capacity as the administrators of the Scheme appointed by the Trustees are 'data processors'.
- Members, beneficiaries and other persons associated with them are 'data subjects'.

'Personal data' is information relating to an identified or identifiable natural person that could enable a living person to be identified.

Information we collect from or about you

The information about you that we collect and process may be provided from a number of sources including: by you; your employer or a previous employer; HM Revenue & Customs (HMRC); a tracing agency who may use a range of sources such as the electoral roll (e.g. if we are trying to trace you); and (with your consent) your doctor (e.g. if retiring on grounds of ill health).

This information may include some or all of the following:

- Personal details such as name (including former names), date of birth, sex, contact details (eg home address and former addresses, telephone numbers and e-mail address) and identifiers such as National Insurance (NI) number.
- Employment and pension scheme membership details such as dates of joining and leaving employment (including reason for leaving, where relevant to benefit calculations) and employment history (eg whether part-time or full-time, periods of absence and job title), periods of pensionable service, earnings and details of other benefits.
- Details of pension contributions and benefits, such as compulsory and voluntary contributions, actual or potential defined benefits and defined contribution account information.
- Other financial details such as other pension arrangements, relevant tax and National Insurance (NI) details (e.g. tax code, Lifetime Allowance and other protections), bank account details and deductions from pension payroll.

- Details of family and social circumstances such as current marriage or civil partnership, any previous relationships and dependants and death benefit distribution information (including expression of wish forms).
- Copies of identification and similar documents (eg birth, marriage, civil partnership and death certificates, passport identity pages, decree absolute).
- Court orders such as pension sharing and earmarking orders and attachment orders.
- Information about physical or mental health where there is a legal basis to do so to determine and provide benefits.

Our use of your personal data

We must have a legal reason to use your personal data and this will usually be:

- to comply with legal or contractual requirements;
- for the performance of contractual requirements;
- for the legitimate interests of administering the Scheme; or
- with your consent.

We may ask you to consent to us processing information in some circumstances. For example where personal data collected is categorised as a special category of personal data (such as information about your health if retiring on grounds of ill health), or where we are asking for your feedback on services, if there is not an alternative legal basis for processing it we may ask for your consent.

If we do not have your consent it may mean that we are unable to pay benefits to you or your dependants. Where you have given consent to hold specific data you can withdraw this consent at any time by writing to us using the contact details given below.

When you provide personal information about your beneficiaries the Trustees, the Scheme Actuary and LCP assume that you do so with their full knowledge and consent.

Purposes of processing the data

We collect and process your data based on the lawful reasons set out below:

We process your data where it is necessary for us to comply with legal obligation such as:

- To trace you and other beneficiaries.
- To establish your identity and eligibility for benefits (including following divorce or death and in cases of ill-health early retirement).
- To calculate and reconcile contributions.
- To calculate and pay pension benefits, and deal with any queries about these.
- To communicate with you about your benefits and the pension scheme in general.
- To pay tax charges, monitor whether allowances are exceeded and report to HM Revenue & Customs.
- To assist with the Scheme Trustees' compliance with legal obligations, such as reporting to relevant authorities and government bodies.
- To prepare scheme accounts and assist the Trustees' auditors.
- To carry out actuarial, statistical and financial modelling calculations in order to advise the Trustees about pension scheme funding and investment matters.

- To comply with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes.

We rely on our legitimate interests in processing your data:

- To run mortality and address checks against member records to ensure information is correct and to prevent and detect fraud.
- For risk management purposes, including the insurance or management of longevity risks and obtaining quotations for annuities or other insurance products.

We process your data where it is necessary for us to perform a contract:

- In connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the employers participating in the Scheme.

Who we might share this data with

The Trustees, the Scheme Actuary and the administrators as listed on page 1 will share your personal data with each other as necessary and with other advisers and service providers used to help administer the Scheme. This may include the Scheme's: legal advisers, investment advisers, auditors and accountants. It may also include other organisations such as tracing, archiving, document printing and distribution and IT service providers. If you require details of any of these advisers/providers please contact us using the details given below.

In some circumstances, we may need to pass personal information to other third parties who advise or assist the Trustees and the Scheme Actuary, the sponsoring employer and any business associated with it, prospective purchasers of any of them (although in this latter case, where practicable, the data is anonymised), Government bodies, fund providers, insurance companies and persons associated with you. In the event that any such third party processes personal information, reasonable steps will be taken to ensure that such third party agrees in writing to act only on our instruction and provides appropriate guarantees in respect of the technical and organisational security measures governing the processing to be carried out.

This may also involve transferring personal data to countries outside the European Economic Area (the "EEA") and where that is the case reasonable steps will be taken to ensure that the processing of any personal data by the third party, including the transfer to the third party complies with the data protection laws and regulations.

We may also pass personal information to other third parties at your request, for example where you are considering a possible transfer and you have asked us to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation we will assume that you have satisfied yourself that the third party has suitable security measures in place.

We do not carry out any automated decision making using your personal data and we will not use or share your data for marketing purposes.

How long we keep your personal data

We will keep your personal data, in accordance with the law and regulatory guidance, for as long as is necessary for the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Scheme. When no longer needed, we will ensure that personal data is securely destroyed.

Your rights

You have the right to:

- a copy of your personal data held;
- have your data corrected if it is inaccurate or incomplete;
- have your data deleted or removed if it is no longer necessary for the purpose of administering the Scheme;
- restrict the processing of your data;
- withdraw any consent you have given in respect of your personal data;
- data portability - to obtain and reuse your data for your own purposes.

If you wish to exercise any of these rights please contact us using the contact details below. We will aim to respond to any request received from you within one month of receiving your request. Access to your data will usually be provided free of charge.

Contact details	Complaints
<p>You do not need to take any action as a result of reading this but if you have any questions please contact:</p> <p>Peter Rowley Scheme Secretary LEONI UK Pension Scheme Lower Milehouse Lane Newcastle under Lyme Staffordshire ST5 9BT</p> <p>Tele: 01782 604444</p> <p>Email: peter.rowleyHR-external@leoni.com</p>	<p>If you are not happy with the way your personal data is held or processed, please contact us at the address in the first column of this table.</p> <p>You also have the right to complain to the Information Commissioners Office (ICO) using the following contact details:</p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Tel: 0303 123 1113</p> <p>Email: casework@ico.org.uk</p> <p>More information is available on the ICO website at https://ico.org.uk/.</p>

Updates to this notice

We may update or amend this privacy notice from time to time to comply with law or to meet changing business requirements. You will be notified of any changes.

This privacy notice was last updated in April 2021.