

# USDAW STAFF SUPERANNUATION FUND

## PRIVACY STATEMENT

Data Protection Legislation ('the Legislation') imposes obligations on those who hold and process personal information. The Legislation also gives you certain rights.

The Trustees of the Usdaw Staff Superannuation Fund ('the Scheme') need to hold personal information relating to you and, when required, your beneficiaries in order to administer your pension benefits. This includes both 'personal data', e.g. your name, age, contact details, etc, and 'special categories of personal data', e.g. health information, etc. The Legislation applies to the Trustees in respect of such information. The Trustees are committed to protecting and respecting the privacy of your personal information. This Privacy Statement describes how we treat the information the Trustees hold about you.

The Trustees are joint data controllers with the Scheme Actuary and this notice is issued on behalf of both the Trustees and the Scheme Actuary.

### **Information the Trustees Collect**

In order to perform the contract of administering your pension benefits, the Trustees may collect and process the following data about you:

- Information you give to the Trustees about yourself by filling in forms, or by corresponding by phone, e-mail, letter or in person. The information you give may include your name, date of birth, address, e-mail address and phone number, National Insurance number, financial information, any health issues that relate to you and other personal information.
- Information the Trustees receive from other sources. The other main source of information about you is your employer or former employer (i.e. the Union), who may have provided some of the information listed above when you joined the Scheme or may have provided updates as that information changed over the course of your employment. In connection with any application for early payment of a pension on the grounds of incapacity, the Trustees may also receive information about you from your doctor or other medical advisers with your consent.

### **Your Rights**

You have the right to be informed about the processing of your personal data, request access to your personal data, and its rectification, erasure, restriction on processing, objection to processing and portability.

### **Uses Made of the Information Collected**

The Trustees use information held about you in the following ways:

- Information you give to the Trustees, which is used to calculate and administer the benefits payable to and in respect of you under the Scheme;
- The Scheme Actuary, Hilary Salt of First Actuarial LLP, processes your personal data to undertake various tasks, primarily around Scheme Funding

- Information received from other sources, which may be combined with information you give to the Trustees and information they collect about you. The Trustees may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **Disclosure of Your Information**

Personal information will be disclosed only as required for the purpose listed above to relevant staff of the Union to the extent that it is relevant to the administration of your pension benefits. Personal information may also be disclosed in response to requests from third parties such as banks, mortgage lenders, independent financial advisers, lawyers, actuaries, accountants and other third parties in each case only if you consent to such disclosure.

In addition, personal information may be disclosed to persons who may be appointed to carry out part of the Trustees' responsibilities, service providers of outsourced services or other agencies/companies who provide services to the Trustees, who are under the same duty of confidentiality.

Such services include:

- Pension benefits administration (including, amongst other things, services such as actuarial services, risk management, legal advice and defined contribution investment and administration management);
- Pensioner audit checks;
- Disputes, complaints and other investigations;
- Legal services;
- Tax administration.

As part of the contractual arrangements between the Trustees and its third party service providers, the service provider is required to maintain appropriate levels of security and confidentiality in respect of personal information and only to use it as instructed by the Trustees. The Trustees will at all times remain responsible for the processing of your personal information that is carried out on the Trustees' behalf.

The Trustees may be required to disclose members' personal information in response to requests from a government agency, court, tribunal, ombudsman or regulator, or otherwise as part of the disputes process.

Where the Trustees share your data based on consent, you have the right to withdraw consent for sharing your personal data.

### **Storing your Personal Data**

The majority of the personal information for Scheme members is held on secure servers. Hard copy documents received are scanned and held electronically. Any documents which need to stay in hard copy are stored securely. Documents relating to your pension are retained for 6 years after the pension has closed and then are destroyed. Other information relating to Additional Voluntary Contributions (AVCs) is held by the Scheme's AVC provider, Royal London Group, who are under a duty of confidentiality to the Trustees.

## Access to Information

For the purpose of the Legislation, the data controllers are:

- the Trustees of the Usdaw Staff Superannuation Fund, Voyager, 2 Furness Quay, Salford, M50 3XZ; and
- the Scheme Actuary, Hilary Salt of First Actuarial LLP, Trafford House, Chester Road, Manchester, M32 0RS

The Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Legislation.

## Changes to the Data Protection Policy or Privacy Statement


Any changes to the Scheme's Data Protection Policy or Privacy Statement in the future will be notified to you in writing.

## Contact

Questions, comments and requests regarding this Privacy Statement or the Trustees' processing of your data can be addressed to the Secretary to the Trustees of the Union of Shop, Distributive and Allied Workers Staff Superannuation Fund, Voyager, 2 Furness Quay, Salford, M50 3XZ.

Further information about the operation of the Data Protection Legislation, including details of how to make a complaint to the Information Commissioner can be obtained at [www.ico.org.uk](http://www.ico.org.uk) or by telephoning 0303 123 1113.

This Privacy Statement was approved by the Trustees on **22 June 2022**.

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Signed: (**Jane Jones, Chair of the Trustees**)

