

HWG 2006 Limited Pension Plan (the Plan) Privacy notice

Purpose of this notice

This privacy notice aims to give you information on how the personal data regarding your membership of the Plan is collected and processed.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

We may update this privacy notice from time to time. We will provide you with a new privacy notice when we make any substantial updates.

Data Controller

The Trustee of the HWG 2006 Limited Pension Plan is the “data controller” of the personal information collected and used by the Plan. This means the Trustee is responsible for deciding what personal data about you is required and how it should be protected.

In addition, the Scheme Actuary and First Actuarial (the Plan’s Actuarial Advisers and Administrator) act as joint data controllers for the personal data that the Trustee uses. This privacy notice covers the Scheme Actuary and First Actuarial as joint data controllers.

There may be other joint data controllers who will write to you separately.

What personal data do we hold and use?

The information we hold on you may include:

- details of your employment history, including salary information
- personal information including name, maiden name, date of birth, National Insurance number and contact details
- records of any benefits you have transferred into the Plan from other pension arrangements
- records of any additional contributions you or the employer, on your behalf, have paid into the Plan
- information on benefits you will receive from the Plan
- your bank account details (but only from the time we need to start paying benefits to you)

Why do we hold this information?

The Scheme Actuary and First Actuarial hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing actuarial advice and valuations for the Trustee. For example, the Scheme Actuary carries out calculations to advise the Trustee if the Plan has enough money to pay the future benefits promised to its members.

Where did we get information about you?

The personal data we hold about you was given to us by the Trustee.

Who do First Actuarial share your information with?

To run the Plan, your personal information will be used by the Scheme Actuary, First Actuarial and the Trustee's advisers, as necessary (including the auditor and legal advisers). First Actuarial may also need to share your personal information with other parties such as annuity providers and tracing agencies (for example, if you move to a new house and don't tell us your new address). Where we do share information with these parties we remain in control of the data and we will ensure that suitable data protection agreements are in place.

We may transfer your data to separate third parties on behalf of the Trustee. These parties are:

- official organisations who we have a legal obligation to provide information to. This includes HMRC and the Pensions Regulator
- insurance companies, for example, if the Trustee buys an annuity on your behalf
- other pension schemes, if you ask us to transfer your benefits to a new scheme
- the Employer, or their advisers, to enable them to manage their financial commitment to the Plan, to produce pension related accounting disclosures and to allow them to answer questions you may have about your benefits or to give you guidance on pension related matters.

We only share information about you where it is necessary for the running of the Plan. We do not share information about you for any other reason.

How long do we keep your data?

The Scheme Actuary and First Actuarial hold a copy of your data. Should the Trustee change the Scheme Actuary, actuarial advisers or administrators, First Actuarial will keep a copy of the data for a minimum of one year and a maximum of seven years.

Your rights

You may ask for a copy of the information we hold on you. You may make this request by contacting us.

If, at any point, you believe the information we hold on you is wrong, you can ask us to correct it.

In some circumstances, you may also have a right to ask us to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

If you wish to raise a complaint on how we handle your personal data, you can contact us, to have the matter investigated. If you are not satisfied with our response or believe the way we are processing your personal data is not in accordance with the law you can complain to the Information Commissioner's Office.

Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Plan so that we can continue to pay you benefits when due, and contact you about your membership of the Plan. In particular, please let us know if you move home, so that we can stay in touch with you.

Contacting us

You may contact us for further details on how we use your personal information, or with any other questions about this privacy notice, including any requests to exercise your rights, via the Plan administrator whose contact details are:

First Actuarial LLP
Mayesbrook House
Lawnswood Business Park
Leeds
LS16 6QY

Tel: 0113 818 7300

Email: leeds.admin@firstactuarial.co.uk