

LAUREL PUB PENSION SCHEME

Personal information and what we do with it

The Trustee of the Scheme needs personal information about you to run the Scheme and pay benefits. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what we do with your personal information. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the use we make of your information.

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, and previous or alternate names, gender, date of birth, national insurance number ("NINO") and/or partial or "dummy" NINO and bank account information (where benefits are in payment).
- Contact details (including your address, postcode, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Details of your contribution amounts and investment choices.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.
- Electronic "pension identifiers" for pensions dashboards (explained below).

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

Pensions Dashboards

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in one place. As part of this, we are required by law to match certain members (who search on dashboards) with their pensions under the Scheme. We must also provide certain pensions information to the dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service) so that it can be displayed when certain members ask to see it on a dashboard.

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the provider(s)/administrator we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these dashboards duties, we may also need to report information (which could potentially include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

Where we get personal information from

Some of the information we have comes directly from you. In addition, Aptia, who administers the Scheme on our behalf, may have obtained information from you and passed it to us.

Sometimes we get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred

benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if we have lost touch with you and are trying to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Some of your personal data may be collected indirectly through the pensions dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service). Where we obtain personal data from the dashboards ecosystem, or during the process of matching members with their Scheme benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Scheme.

Why we hold personal information and how we share it

We must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

Pensions dashboards regulations impose a legal obligation on us to match certain members with their pensions and provide information on their pension benefits. Getting ready for pensions dashboards compliance can also be part of our legal obligations.

We also have a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance); and testing data and getting ready for pensions dashboards compliance.

In order to achieve this, we may share your personal information with various people, including: any new trustees; the Scheme employers; the Scheme administrator; our other professional advisers, including the Scheme Actuary (see further below) and lawyers; auditors; insurers (including Utmost Life and Pensions Limited); pensions dashboards ecosystem (as described above); non-commercial dashboards; commercial dashboards; HMRC; the Pensions Ombudsman; the Information Commission; and IT and data storage providers and other service providers such as tracking and tracing agencies who seek to locate members if we have lost touch with them. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent, and we will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time using the contact details given below. This may affect what we can do for you, unless we have another lawful reason for using your information.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, we may share your personal information with the employers so that they can contact you for that purpose.

Scheme Actuary

The Scheme Actuary (currently Nick Kenny of Willis Towers Watson) is appointed by us to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. He will use your personal information for this purpose and has a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with his own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement

agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Scheme Actuary for statistical research, but only in a form that no longer identifies you.

The Scheme Actuary has produced its own privacy notice, which can be found at:

www.willistowerswatson.com/personal-data

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from us or from any other people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them (or the Trustee will ask them for the information they have, if they are processors, so that the Trustee can reply to you).

How long we keep your personal information for

We keep your personal information for long enough (including if your data originated from the pensions dashboards ecosystem and if you were matched up with the Scheme through that) to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you, and also to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it. The majority of the personal information that we hold will be retained for such period as is reasonably necessary for the proper running and administration of the Scheme and the performance of our legal obligations and the pursuit of our legitimate interests.

Our current retention policy is that personal information will be retained by the Scheme for so long as you are entitled or may become entitled to benefits under the Scheme, and, because trustees of pension schemes can commonly face complaints or questions from members, former members, other individuals or regulatory authorities many years after a member / beneficiary has ceased to be entitled or prospectively entitled to benefits, some personal information may need to be kept longer. However, we will not retain personal information for longer than is necessary having regard to the purpose for which it is held.

We will keep this data retention policy subject to review and may update it from time to time to ensure it remains appropriate.

Data from the pensions dashboards ecosystem is kept for the life of the member record, if we do find a match (i.e. if you are a member of the Scheme).

If we don't find a match (i.e. if you are not a member of the Scheme), we will have the Scheme administrator delete the data from the dashboard straightaway.

If we find a potential match, we will keep the data from the dashboard for 30 days in a hash/token form (which helps with security of it) so that we have more time to determine whether there's a match or not. We will delete it after 30 days if there is no match, or keep it for as long as we keep your member record (details as above) if we do find a match.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;

- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- make a complaint to us if you think there has been an infringement of data protection laws.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use our contact details, which are set out below. We can also supply more information about these rights to you, on request.

In addition, you have the right to complain to the Information Commission – details as below.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact us via Aptia at:

Web portal: pensionuk.aptia-group.com

Calling: 0345 646 0643

Writing to: Laurel Pub Pension Scheme
Aptia Limited
Maclaren House
Talbot Road
Stretford
Manchester
M32 0FP

If you have concerns about the way we handle your personal information, you can contact the Information Commission or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.