

Privacy statement

Who we are

Capital Cranfield Pension Trustees Limited ("**Capital Cranfield**", represented by Alison Creasy), Amanda Perrin and Michael Edwards are the current trustees (the "**Trustees**") of the Sun Life Assurance Company of Canada 1988 UK and Irish Employee Benefits Scheme (the "**Scheme**").

As the Trustees of the Scheme, we hold certain personal information (known as "**personal data**") about Scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustees in running the Scheme will be personal data.

For legal purposes, the Trustees are known as the "**data controller**", as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name, date of birth, national insurance number and gender;
- your address and other personal contact details (such as telephone number and email address);
- your financial details, needed to pay benefits to you;
- family details, which may identify potential beneficiaries and dependants to allow us to consider your wishes for the payment of any benefits in the event of your death (such information may include your relationship status);
- relevant employment information (including past salary information and employment dates);
- details about your pension benefits; and
- medical and other details about your health.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "**special categories of personal data**"). Under the legislation, details relating to health, sexual orientation and sexual life are regarded as special categories of personal data. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. The Trustees may, at times, need to process this type of data, for example, when considering any information relating to your relationship status on an expression of wish form.

How we obtain your personal data

Now that the Scheme is closed to the future accrual of benefits, your personal data is generally collected directly from you (whilst the Scheme was ongoing, your data may also have been obtained from your current/former employer). However, we may also receive personal data from other parties such as HM Revenue & Customs or the Pensions Ombudsman. If you are receiving a survivor's benefit from the Scheme, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death.

How we use that information

The Trustees have a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also

keep the above information in order to allow us to comply with our obligations towards members under the Scheme's governing documents, as well as under relevant legislation.

The main purposes for which we use your personal data are:

- to set up, administer and manage your benefits;
- to provide information to you, or a representative authorised by you, in response to queries, changes to your benefits, or changes in legislation that we must tell you about;
- to undertake identity checks, to ensure that your benefits are protected against fraud and that you are still alive; and
- for compliance with regulatory and legal obligations, such as submitting statutory tax reports to HMRC.

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustees must process this information fairly and lawfully,

Will personal data be transferred outside of the UK?

The Trustees, and certain organisations with which the Trustees share personal data, may transfer, store, or process personal data outside the UK. Where this is the case, the Trustees will take reasonable steps to ensure that the personal data continues to be appropriately secured. 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).

Who we share it with

As the Trustees need help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current or past employer;
- the Scheme's professional advisers, including the Scheme actuary, auditor, medical advisers, provider of secretariat services, investment adviser and lawyers;
- the independent trustee company (Capital Cranfield), which is appointed as a Trustee of the Scheme;
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustees;
- the providers of various contracts of insurance held by the Trustees;
- the Secretary to the Trustees and other Scheme staff (who may be employed by Sun Life Assurance Company of Canada (U.K). Limited);
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator);
- the providers of the Trustees' banking and payment facilities;
- third parties who provide member verification services; and
- tracing agencies, where we have been advised that you no longer reside at the address on our record.

In some instances, the Trustees will share your personal data with organisations who are:

- Data controllers in their own right - this is likely to be the case where those organisations are not simply acting on the instructions of and fulfilling the purposes of the Trustees, but are using the personal data for their own ends and in a way that is not aligned with the Trustees' purposes.
 - o Capital Cranfield has identified itself in this way and will continue to be so should their appointment as Trustee come to an end in order that they can continue to assist with member and beneficiary queries and complaints. Capital Cranfield's privacy notice will be accessible through the following link: <http://capitalcranfield.com/wp-content/uploads/2018/04/PRIVACY-NOTICE.pdf>
 - o Sun Life Assurance Company of Canada, as a provider of insurance to the Trustees, has also identified itself as a data controller. Sun Life Assurance Company of Canada's privacy notice will be accessible through the following link: www.sunlife.com/sl/pslf-united-kingdom/en/
 - o Rothesay Life, as a provider of insurance to the Trustees, has also identified itself as a data controller. Rothesay Life's privacy notice will be accessible through the following link: <https://www.rothesay.com/media/32sdrods/bi-pn-oct-2020-limited.pdf>
 - o Pension Insurance Corporation ("PIC"), as a provider of insurance to the Trustees has also identified itself as a data controller. PIC's privacy notice will be accessible through the following link: [Privacy Notice Buy-in \(pensioncorporation.com\)](http://www.pensioncorporation.com/privacy-notice-buy-in)
 - o Crowe LLP, as auditor to the Scheme has also identified itself as a data controller. Crowe's privacy notice will be available through the following link: www.crowe.com/uk/privacy-policy
- Joint data controllers with the Trustees — this is likely to be the case where the organisation is acting alongside the Trustees in making decisions about what personal data is collected and why, and what it is used for. The current Scheme actuary (acting on behalf of Hymans Robertson LLP) has identified itself as a joint data controller. However, the Trustees will remain your primary point of contact for data protection purposes (see "Who to contact about your personal data" below).

How long we keep personal data for

The Trustees will keep personal data for as long as is required to meet the purposes for which it was collected. In practice, this will be the lifetime of the relevant Scheme and for an appropriate period after that time. This is because of the long-term nature of pension schemes and the possibility of queries being brought many years after an individual has ceased to be a member or a scheme has been wound up.

From time-to-time, the Trustees will consider whether certain types of personal data are no longer needed. If they aren't, they will generally be destroyed, erased or made inaccessible.

Your rights

- **Right of Access** — you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.
- **Right to Rectification** — if at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected.
- **Right to Restrict processing** — you can require the Trustees to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** — as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustees can override this objection in certain circumstances.
- **Withdrawing consent** — where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact about your personal data" below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustees to continue processing your personal data where this is justified.
- **Right to be forgotten** — you can request that your personal data is deleted altogether, although the Trustees can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the relevant Scheme, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

please contact Paragon Pensions, who provide secretariat services to the Trustees, by email on info@paragonpensions.com or by post to:

Paragon Pension Services Limited, The Firs, 100 Reading Road, Finchampstead, Wokingham RG40 4RA

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you have the right to lodge a complaint with the Office of the Information Commissioner whose helpline number is: 0303 123 1 1 13.

Security

We strive to use appropriate technical and physical security measures to protect your personal data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration and unauthorised disclosure. Service providers with access to your personal data are



also selected carefully, must undergo due diligence including a privacy risk assessment, and are contractually required to use appropriate protective measures.

Updates to this notice

This notice is the latest version as at April 2022. This notice will be updated from time to time and you can see the current version at any time on the Trustees' website at www.1988Onlinebenefits.co.uk. Should you not have access to the internet, please contact Paragon Pensions (see "Who to contact about your personal data" above).