

## **PRIVACY NOTICE FOR THE RIVERSIDE GROUP PENSION SCHEME**

### **(the “Scheme”)**

Riverside Group Pension Trustees Limited (the “**Trustee**”), as the trustee of the Scheme, holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

#### **What we do with your data**

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme and for other legitimate purposes relating to the operation of the Scheme, which include:

- calculating, administering and paying your benefits under the Scheme or following your death;
- processing ill-health retirement claims;
- dealing with any queries/complaints/appeals etc. regarding decisions we have made, for example in relation to your or your dependants’ entitlement to benefits under the Scheme;
- carrying out actuarial valuations and investment of the Scheme’s assets; and/or
- compliance with legal, regulatory and good governance obligations and as otherwise lawfully permitted from time to time.
- Operating the scheme website,

The legal basis for doing so is in order for the Trustee to comply with its legal obligations.

Whilst much of the data we hold has been provided by you, we also hold and process data provided by third parties such as The Riverside Group Limited, the Scheme’s principal employer, (the “**Company**”), other pension schemes from which members have transferred, HMRC, the DWP and other regulatory bodies and tracing organisations. We also receive information from members of the Scheme (such as you) about their proposed beneficiaries, who may be eligible to receive benefits on your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the scheme.

#### **What data is processed?**

The data we hold about you (and your beneficiaries) is to assist the Trustee in calculating, administering, paying benefits and operating the website includes (but is not limited to):

- full name, age, gender, date of birth, national insurance number, passport or ID number, and or other governmental identification numbers;
- business and/or personal contact details, including address, telephone numbers and email addresses;
- financial information, including salary, tax information, pension or prospective pension entitlement, bank account details;
- employment details, including years of service, dates of employment, full or part time employment status, job band, salary, compensation, employee claims, bonuses and benefits;
- pension scheme status, including start date and leave date of joining the Scheme;

- your preferences in relation to your pension benefits; and
- marital status and relationship data, including the full name, date of birth, contact details and relationship to your family members, dependants and/or beneficiaries.
- Cookies and other tracking information on the scheme's website.

We also hold and process some special categories or “sensitive” data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will in most circumstances process this data in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). We may also, typically when considering claims under the Scheme's Internal Dispute Resolution Procedure, process any sensitive data for the purposes of establishing, exercising or defending legal claims. If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

### **Who else processes your data?**

We share your personal data with certain third parties involved in running the Scheme, for example, the Scheme's administrator, the Scheme actuary and actuarial team, the Trustee's legal advisers, the Scheme's independent professional trustee, the Scheme's auditor, life assurance providers, insurers, investment managers, additional voluntary contributions providers, medical advisers, communications providers, tracing organisations, HMRC, DWP, the Pensions Regulator, the Pensions Ombudsman and the Pensions Advisory Service. Details of the third party entities/individuals with whom we share your personal data are set out in the Appendix to this Policy.

In some circumstances we are joint controllers with the Scheme actuary, the Trustee's legal advisers (who may process your data to comply with their professional duties as advisors to the Trustee), insurers, auditors and the Company. The Company holds and processes your personal data to comply with its legal obligations as the sponsoring employer of the Scheme. The Company has a legitimate interest in the Scheme being run in a cost effective way and may have an interest in offering certain options to members.

The current Scheme Actuary, Sam Mullock FIA and / or First Actuarial LLP when providing defined benefits actuarial consulting services, are Data Controllers in common with the pension scheme trustees and so we share your personal information with First Actuarial in order for them to provide these services. The First Actuarial Privacy Information is available at <https://privacy.firstactuarial.co.uk/Notices/PensionSchemeMembers>. We ask that you read First Actuarial's Privacy Information carefully.

### **Storage of your personal data**

We store your information until such time as we will no longer need it. Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Scheme ends.

Once your membership ends, we will decide whether it is appropriate to delete some of the data held in relation to you after 6 years. However, some information will need to be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

First Actuarial will hold on to your data for 7 years after the termination of its contract with us. This is to protect themselves against any subsequent legal claims.

### **Your rights**

You have the right to access your personal data (including for the purposes of transmitting elsewhere) and to require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing, or request a copy of your personal data for the purposes of transmitting elsewhere.

Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

### **Contact details**

If you have any questions about this Privacy Notice, please contact the Trustee as follows:

The Riverside Group Pension Trustees Limited  
c/o The Secretary to the Trustee  
First Actuarial  
Trafford House  
Chester Road  
Manchester  
M32 0RS

[RGPSsecretary@firstactuarial.co.uk](mailto:RGPSsecretary@firstactuarial.co.uk)

### **What if you have a complaint?**

To make a complaint about how we have handled your information, contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745

November 2019

## APPENDIX

### Details of third party providers

<b>Role</b>	<b>Name of entity/individual</b>
Administrator	First Actuarial LLP
Actuary	Sam Mullock FIA of First Actuarial LLP
Legal adviser	CMS Cameron McKenna Nabarro Olswang LLP
Independent trustee director	Capital Cranfield Pension Trustees Ltd, represented by William Medlicott
Auditor	KPMG
Pension adviser	First Actuarial LLP
Insurer/annuity provider	Aviva
Investment managers	Legal and General Investment Management Limited, Artemis Investment Management Limited, Schroder Pension Management Limited, Standard Life Investments, The Partners Group, Newton Investment Management Limited
AVC provider(s)	Friends Life; Equitable Life; Phoenix Life and Pensions
Medical adviser	Doctor Lister, Consultant Physician in Occupational Medicine
Communications provider	First Actuarial LLP
Life assurance provider	Canada Life