

**RELIANCE PRECISION LIMITED**

**RETIREMENT AND DEATH  
BENEFIT SCHEME**

**Data Protection Policy**

## **1. Introduction**

The Trustees of the Scheme hold, process and disclose information about members and their dependants for the purposes of administering the Scheme.

This may include:

- personal details
- family details
- lifestyle and social circumstances
- financial details
- employment details

The Trustees are committed to complying with data protection legislation and in particular with the requirements of the General Data Protection Regulations. The Trustees consider that the lawful and correct treatment of personal information is critical for successful management of the Scheme and to retain the confidence of our members and their dependants. All personal data is processed lawfully, fairly and in a transparent manner.

This personal information is collected and dealt with appropriately whether it is collected on paper, stored in a computer database, or recorded on other material. There are safeguards to ensure this under the General Data Protection Regulations

This policy and the guidelines included with it apply to all personnel who handle personal data on behalf of the Trustees: the Trustees, employees of Reliance Precision Limited and of Reliance RG Limited, and employees of other organisations who handle, process, or store our data etc.

The Scheme Secretary has overall responsibility for this policy and is first point of contact for any questions about it. Contact details are at the end of this document.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes in legislation.

## **2. Data Controller**

The Trustees and the Scheme Actuary are 'data controllers'. The data controller determines for what purposes personal information is held and how it is used. The data controller is also responsible for notifying the Information Commissioner of the data that the Trustees hold or are likely to hold and the general purposes for which this data will be used.

## **3. Disclosure**

The information will only be disclosed to other organisations such as pension consultants and administrators or insurance companies where this is essential in connection with the administration of the Scheme.

Members will generally be made aware of how and with whom their information will be shared and the controls that govern this by the publication of a Privacy Notice.

The regulations allow the following legal bases for processing personal data:

(a) Consent: the individual has given clear consent to the processing of their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract the data controller has with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for the legitimate interests of the data controller or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

The Trustees consider that the legitimate interest basis covers all of their data processing of personal and sensitive personal data.

#### **4. Data Storage**

Information and records relating to members and their dependants will be stored securely and will only be accessible to authorised people.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately when no longer required.

The Trustees ensure that all personal and Scheme data is rendered un-recoverable from any computer equipment which has been used to store it and which is removed from use and disposed of.

## **5. Data access and accuracy**

All members have the right to access the information held about them. The Trustees will take reasonable steps ensure that this information is kept up to date by regularly asking members whether there have been any changes.

In addition, the Trustees ensure that:

- Everyone processing personal information understands that they are responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- Enquiries from members about how their personal information is handled are dealt with promptly and courteously
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them

## **6. Rights of individuals**

Individuals have rights to their data which we respect and comply with to the best of our ability. The Trustees ensure that individuals can exercise their rights in the following ways:

### **1. Right to be informed**

We provide privacy notices which are concise, transparent, and written in clear and plain language.

We maintain a record of how we use personal data to demonstrate compliance with the need for accountability and transparency.

### **2. Right of access**

We allow individuals to access their personal data and supplementary information.

### **3. Right to rectification**

We will rectify errors in personal data of the individual within a month of notification.

#### 4. Right to erasure

We will delete or remove an individual's data if requested providing there is no compelling reason for its continued processing or retention.

#### 5. Right to restrict processing

We will comply with any request to restrict, block, or otherwise suppress the processing of personal data. We are permitted to store personal data if it has been restricted, but not process it further. We retain enough data to ensure the right to restriction is respected in the future.

#### 6. Right to data portability

We provide individuals with their data so that they can reuse it for their own purposes or across different services. We provide it in a commonly used, machine-readable format, and send it directly to another controller if requested.

#### 7. Right to object

We respect the right of an individual to object to data processing based on legitimate interest or the performance of a public interest task.

#### 8. Rights in relation to automated decision making and profiling

We respect the rights of individuals in relation to automated decision making and profiling. Individuals retain their right to object to such automated processing, have the rationale explained to them, and request human intervention.

## 7. Data breach policy

Everyone has a duty to report breaches of this policy or of any applicable data protection laws ***as soon as they are aware of the breach***. The Trustees have a duty to report such breaches to the Information Commissioner within 72 hours of notification. Breaches should be reported to the Scheme Secretary.

## 8. Contact details

Scheme Secretary  
Reliance Precision Retirement and Death Benefit Scheme  
Rowley Mills  
Penistone Road  
Lepton  
Huddersfield  
HD8 0LE

Tel: 01484 601000

Email: [jp@reliance.co.uk](mailto:jp@reliance.co.uk)

## Glossary of Terms

**Personal Information** – means information about living individuals that enables them to be identified – e.g. name and address.

**The Scheme** means the Reliance Precision Limited Retirement and Death Benefit Scheme.

**Sensitive data** – means data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings