

**Reliance Precision Limited Retirement & Death Benefit Scheme**  
**(the "Scheme")**

**Data Privacy Notice**

## Table of Contents

<b>INTRODUCTION</b>	<b>2</b>
<b>WHAT IS PERSONAL DATA?</b>	<b>2</b>
<b>WHAT TYPES OF PERSONAL DATA MIGHT WE HOLD ABOUT YOU?</b>	<b>2</b>
<b>WHY DO WE HOLD THIS DATA?</b>	<b>2</b>
<b>USING YOUR DATA IN ACCORDANCE WITH DATA PROTECTION LAWS</b>	<b>2</b>
<b>WHAT DO WE DO WITH THE DATA?</b>	<b>2</b>
<b>HOW LONG DO WE KEEP YOUR DATA FOR?</b>	<b>3</b>
<b>WHO DO WE SHARE THE DATA WITH?</b>	<b>3</b>
<b>DATA SECURITY AND WHERE WE STORE YOUR PERSONAL DATA</b>	<b>3</b>
<b>YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA</b>	<b>3</b>
<b>ANY COMPLAINTS?</b>	<b>4</b>
<b>CHANGES TO THIS PRIVACY NOTICE</b>	<b>4</b>
<b>CONTACT US</b>	<b>4</b>

## Introduction

This notice explains how the Trustees of the Scheme use and protect the personal information that they hold about members and other beneficiaries of the Scheme. Contact details for the Trustees are set out at the end of this notice.

The Trustees are a "data controller" for the purposes of the data protection laws. The Data Protection Act 1998 was replaced by new data protection laws (the General Data Protection Regulations (GDPR)) with effect from 25 May 2018. We refer to both the current and the new data protection laws as the "Data Protection Laws" in this privacy notice.

## What is personal data?

Personal data refers to any information that relates to an identifiable living person who can be identified by that data. This data will include data the Trustees have received in operation of the Scheme from you (e.g. when you joined the Scheme) and from the relevant sponsoring employers (e.g. data used to calculate benefits that you are entitled to).

## What types of personal data might we hold about you?

We will receive data from multiple sources and during your various interactions with the Scheme. This could include occasions when you have:

- become a member of the Scheme;
- Corresponded or contacted the Scheme by telephone or email;
- Provided details in relation to your retirement from the Scheme.

The employer will also provide data to us. This would usually be in the form of periodic information in relation to your earnings and pension contributions. This may include details of when you changed working hours, address or marital status.

We may hold and process any or all of the following personal data about you if relevant to your membership of the Scheme:

- Personal details such as your name, sex, age, date of birth, contact details (e.g. your address and postcode, email, telephone and mobile numbers), and identifiers such as your passport number, National Insurance number, pension or member reference number and employee number (where applicable);
- Details of your family and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants;
- Employment details such as your earnings, length of service, joining and termination details and job title;
- Other financial details such as income, salary, bank account details (e.g. to process payments) and other pension benefits; and
- Exceptionally we may hold details about your health.

## Why do we hold this data?

We hold this data because it is necessary for us to run the Scheme. Without your personal data, we cannot provide you with the correct benefits, at the right time. For example, this information may be required to verify your membership of the Scheme, to maintain records of your pension pot and to pay your benefits.

## Using your data in accordance with Data Protection Laws

Data Protection Laws require that we meet certain conditions before we are allowed to use your data in the manner described in this privacy notice.

In relation to personal data we will rely on a condition known as "legitimate interests" in order to process your personal data for the purposes specified above. It is in our legitimate interests to collect and process your personal data as it provides us with the information that we need to administer the Scheme, including providing you with the correct benefits, at the right time.

We will always ensure that we keep the amount of data collected and the extent of any processing to the absolute minimum to meet this legitimate interest.

## What do we do with the data?

We may use your personal data for a number of purposes, including the following:

- To manage the Scheme. This includes processing data to calculate and pay benefits. It could also include dealing with queries relating to your membership of the Scheme;

- To carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- To notify you about services provided to members of the Scheme and any changes to those services;
- For statistical, financial modelling and reference purposes;
- For internal record keeping;
- For risk management, including the insurance of longevity risks and related demographic risks;
- For complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;
- For complying with demands or requests made by any relevant regulators, government departments and law enforcement authorities or in connection with any disputes or litigation;
- In connection with any sale, merger, acquisition, disposal, reorganisation or similar change of the sponsoring employers' business.

### How long do we keep your data for?

We will hold your information for as long as you are a member of the Scheme, and for a period after you cease to be a member in case any further queries arise about your membership of the Scheme.

### Who do we share the data with?

We share your information with the Scheme's administrator, Broadstone. Where required by the Scheme, we may also share your information with:

- The Scheme's service providers, professional advisers, actuaries and auditors;
- Companies within the sponsoring employer's group, and their professional advisers;
- Regulators, government departments, law enforcement authorities, and insurance companies;
- Any relevant ombudsman, dispute resolution body or the courts; and
- Persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the sponsoring employer's business.

Some of these entities may also be data controllers under the Data Protection Laws.

### Data security and where we store your personal data

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

The data that we collect from you will be stored inside the European Economic Area (EEA). However, if you live or work outside of the EEA, we may need to transfer your personal data outside of the EEA to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

We also may transfer data outside the UK or the EEA where the Scheme's service providers host or process data outside the UK or the EEA. Where we do this, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union or is otherwise made in circumstances where appropriate safeguards are in place to protect your data in accordance with the Data Protection Laws.

### Your rights in relation to your personal data

The accuracy of the information that we hold about you is important to us. If any of the information that we hold is inaccurate or out of date, please let us know using the contact details set out at the end of this notice. You also have a number of rights under the Data Protection Laws in relation to the way we process your personal data, namely:

- To access your data (by way of a subject access request);
- To have your data rectified if it is inaccurate or incomplete (right to rectification);
- In certain circumstances, to have your data deleted or removed (right to be forgotten);
- In certain circumstances, to restrict the processing of your data;
- A right of data portability, namely to obtain and reuse your data for your own purposes across different services;
- To object to direct marketing;
- Not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you; and
- To claim compensation for damages caused by a breach of the Data Protection Laws.

Where the above rights, for example to be forgotten, come into conflict with your best interests, namely the provision of an ongoing pension for you or your dependants, the Trustees may reject your request. The reasons for rejecting your request will be explained in writing.

If you wish to exercise any of these rights, please contact us using the contact details at the end of this notice. We will respond to any request received from you within one month from the date of the request. The information will usually be provided free of charge.

### **Any complaints?**

If you are not happy with the way in which your personal information is held or processed by the Trustees, you have the right to complain about data protection matters to the Information Commissioner's Office (ICO). You can visit their website [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or call its helpline on 0303 123 113.

### **Changes to this privacy notice**

This privacy notice is current as at May 2018. We keep our privacy notice under regular review and may change it at any time. We will tell you about any significant changes.

### **Contact us**

For queries on data protection, or if you have any questions about the Scheme please contact us at the following address:

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

Tel: 01484 601000  
Email: [jp@reliance.co.uk](mailto:jp@reliance.co.uk)