

# **National Counties Building Society Pension and Life Assurance Scheme**

## **Data Retention Policy**

### **Principles for Personal Data Retention**

- Due to the nature of the benefits provided by the Scheme, personal data kept in a form which permits identification of Scheme members will be retained indefinitely.
- Personal data will be converted into electronic form, wherever feasible.
- A record of important or significant telephone calls or emails with Scheme members will be retained electronically on the Scheme member's file.
- If the Trustees know that litigation is possible, they will retain any documents that have a link with the subject matter of the potential proceedings. Standard destruction procedures will be suspended in relation to the relevant documents until it is clear they will not be needed.
- All personal data is stored and processed within the UK or the European Economic Area (EEA).

<b>Party</b>	<b>Data held</b>	<b>Means of storage</b>	<b>Shared with</b>	<b>Transmitted by</b>	<b>Category of data</b>	<b>Reason for processing</b>	<b>Grounds for processing</b>
<b>HR</b>	Name, DOB, NI no, start date, salary, address and contact details, bank details, marital status, names and contact details of family members, expression of wish notification (including any implied religious or political views if these are expressed on this form), any relevant medical details.	SD Worx HR system	SD Worx, Punter Southall, Trustees, auditors, regulators	Protected spreadsheets, secure sites, emails.	Personal/Sensitive personal	Processing contributions. Processing retirements. Updating member data. Resolving individual queries. Responding to regulators. Responding to auditors. Preparing data for Trustee decisions. Processing Death in Service cases	Contractual/Legitimate interest
<b>SD Worx</b>	Name, DOB, NI no, start date, salary, contribution levels	SD Worx payroll system	NCBS, HMRC	Protected spreadsheets, secure feeds	Personal	Deducting monthly contributions. Informing HMRC of required deductions.	Contractual

<p><b>Punter Southall</b></p>	<p>Name, DOB, NI no, start date, salary, contribution levels, monthly contributions, address and contact details, banking details (if pension is paid through PS), marital status, any implied religious or political views if these are included on an expression of wish form, any relevant medical details.</p>	<p>Paper files, own systems</p>	<p>NCBS, Trustees, regulators, IFA's, auditors</p>	<p>Protected spreadsheet, emails, secure sites</p>	<p>Personal/Sensitive personal</p>	<p>Processing contributions. Processing retirements. Updating member data. Resolving individual queries. Responding to regulators. Responding to auditors. Preparing data for Trustee decisions. Processing Death in Service cases.</p>	<p>Contractual</p>
<p><b>Trustees</b></p>	<p>Full details of members on an ad hoc basis, collated member data</p>	<p>Own files, Board books</p>	<p>NCBS, Punter Southall, auditors, lawyers</p>	<p>Protected spreadsheets, emails, paper documents</p>	<p>Personal/Sensitive personal</p>	<p>Making decisions for the benefit of members. Responding to regulators, Responding to auditors. Liaising with NCBS over funding.</p>	<p>Regulatory, legitimate interests</p>
<p><b>Sackers</b></p>	<p>Full details of individual members on an adhoc basis, collated member data</p>	<p>Own files</p>	<p>NCBS, Punter Southall, Trustees</p>		<p>Personal</p>	<p>Providing advice to Trustees</p>	<p>Regulatory, legitimate interests</p>

<b>LGIM</b>	Trustee names and signatures	Own files	NCBS, Punter Southall	Emails, paper documents	Personal	Processing investments decisions	Contractual
<b>Regulators</b>	All member data	Own systems	Punter Southall, NCBS, Trustees	Protected spreadsheets, emails.	Personal	Auditing scheme. Investigating issues	Regulatory, legitimate interests
<b>Auditors</b>	All member data	Own systems, paper	Punter Southall, NCBS, Trustees	Protected spreadsheets, secure sites, emails	Personal	Auditing scheme for regulatory and internal audit purposes	Regulatory, legitimate interests
<b>Insurance companies</b>	Individual member data	Own systems	Punter Southall, individual members, IFA's	Letters, bank transfers	Personal/Sensitive personal	Processing individual annuities	Contractual
<b>IFAs</b>	Individual member data	Own systems	Punter Southall, insurance companies, individual members	Letters, emails.	Personal/Sensitive personal	Providing advice to members	Contractual
<b>JLT</b>	Historic records (including all the information as PS above)	Own systems, paper files	Punter Southall, NCBS, Trustees	Emails, paper documents	Personal/Sensitive personal	Dealing with historic issues relating to previous administration	Contractual

