



## **PRIVACY STATEMENT**

The Trustees of the National Counties Building Society Pension and Life Assurance Scheme ("the Scheme") of Ebbisham House, 30 Church Street, Epsom, Surrey KT17 4NL are the data controllers of your personal information in relation to your membership of the Scheme. Personal information means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information.

The Trustees are the data controllers of this information under relevant data protection laws because, in the context of the Scheme's relationship with you, they decide how and why it is collected and processed in the ways explained in this privacy notice. When we use terms such as **we**, **us** and **our** in this notice, we mean the Trustees of the National Counties Building Society Pension and Life Assurance Scheme.

In addition, our actuaries, Punter Southall Limited, including our individual Scheme Actuary, are classed as joint data controllers with the Trustees when providing certain actuarial and consultancy services. They use your personal information for this purpose and have a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers. Punter Southall Limited have appointed a Data Protection Officer whom has been tasked with ensuring compliance with data protection laws.

The Scheme collects and processes personal data relating to its members to manage their membership of the Scheme. The Trustees are committed to being transparent about how they collect and use that data and to meeting their data protection obligations.

### **What information does the Scheme collect?**

The Scheme collects and processes a range of information about you. This includes:

- Your name, National Insurance number, address and contact details, including email address and telephone number, date of birth and gender;
- The dates of your employment with National Counties Building Society;
- Information about your remuneration during any relevant periods of your employment with National Counties Building Society;
- Details of your monthly contributions to the scheme during any relevant periods of your employment with National Counties Building Society;
- Details of your work pattern during your employment (i.e. full time or part-time hours);
- Details of your bank account if your pension is paid through the Scheme;
- Information about your marital status, next of kin, and dependants;

- Details of periods of leave taken by you and the reasons for the leave if these are relevant to your pension benefit;
- Sensitive personal information such as information about medical or health conditions which may affect your entitlement to an ill-health pension

The Scheme may collect this information in a variety of ways. For example, data might be collected through your pension application form, obtained from your passport or other identity documents such as your birth or marriage certificate; from forms completed by you during your membership of the scheme (such as benefit nomination forms); from correspondence with you; or directly from the Society.

In some cases, the Scheme may collect personal data about you from third parties e.g. an independent Financial Adviser who has been nominated by you, HMRC or the Regulator.

Data will be stored in a range of different places, including in the Society's HR management systems and IT systems, on Punter Southall's administration systems, on the Society's and Punter Southall's email systems, and in Punter Southall's paper files.

### **Why does the Scheme process personal data?**

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). Sometimes, more than one legal ground may be relevant.

The Scheme needs to process data to meet its obligations under your pension scheme membership. For example, it needs to process your data to ensure that an ongoing record of your entitlements is kept, to provide you with calculations of your accrued benefits, to ensure payment of your benefits, to obtain insurance for its Death in Service provisions, and to ensure that the Scheme is run and funded effectively and appropriately for the benefit of its members. In some cases, the Scheme needs to process data to ensure that it is complying with its legal obligations. For example, it is required to provide information to the Pensions Regulator and to the Payment Protection Fund.

Some special categories of personal data, such as information about health or medical conditions, are processed if there is a potential for an ill-health pension. We do not need your consent if we use special categories of your personal data to carry out our legal obligations. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of receiving your benefits that you agree to any request for consent from us. For processing that is based on your consent, you have the right to withdraw that consent for future processing at any time. This will not affect any use we have made of the information before you withdrew your consent.

### **Who has access to data?**

Your information may be shared with the Trustees, with Punter Southall as actuaries and administrators, with the Society's HR team, with IT staff if access to the data is necessary for performance of their roles, with internal and external auditors, with other professional advisors eg lawyers and with the Regulators.

The Scheme shares your data with third parties in order to obtain insurance and annuity quotes and policies.

The Society also shares your data with third parties that may process data on its behalf in connection with the payment of your pension.

### **Is your personal information transferred outside the UK or the EEA?**

The Scheme is based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area (EEA). If it is processed within Europe or other parts of the EEA then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us.

If you would like more information on this, please let us know using the details above.

### **How do the Trustees protect data?**

The Trustees and Punter Southall as joint Data Controllers, take the security of your data seriously. They have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by those it is entrusted to in the performance of their duties. These policies are available to view on request.

Where the Trustees engage third parties to process personal data on their behalf, they do so on the basis of written instructions. All parties are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **How long does the Scheme keep data?**

Due to the nature of the benefits provided, the Scheme will hold your personal data for on an indefinite basis.

You can access a copy of the Retention Policy on the National Counties Building Society website: <http://www.ncbs.co.uk> or you can request a paper copy by writing to **PS Administration Limited** Queen's Quay, 33-35 Queen Square, Bristol BS1 4LU.

### **Your rights**

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them, we will explain at that time if the particular right can be exercised in that particular circumstance.

- The right to be informed about your processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the "*right to be forgotten*");
- The right to request access to your personal information and to obtain information about how we process it;

- The right to move, copy or transfer your personal information (“*data portability*”);
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

If you would like to exercise any of these rights, please contact the Trustees via Punter Southall (**PS Administration Limited** Queen’s Quay, 33-35 Queen Square, Bristol BS1 4LU) or Punter Southall’s Data Protection Officer (1 The Strand, London, WC2N 5HR).

If you believe that the Scheme has not complied with your data protection rights, you can complain to the Information Commissioner in writing, by telephone or online:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 or 01625 545 745

Online: <https://ico.org.uk/media/for-organisations/documents/2258298/personal-data-breach-report-form-web-dpa-2018.doc>

#### **What if you do not provide personal data?**

Failing to provide data requested by the Scheme may mean that the Trustees are unable to administer your benefits which may affect your pension.