

Radius Group Pension Scheme

Personal Data Privacy Statement

Why we have produced this statement

We, the Trustees of the Radius Group Pension Scheme, need to collect and process personal data to run the Scheme effectively. We are data controllers in relation to such personal data. We've always taken and will continue to take very seriously our duties as data controller of the personal data we receive concerning members, beneficiaries and potential beneficiaries of the Scheme.

We are required by law to give you certain information about the personal data we hold about you, how and why we use it and the safeguards that are in place to protect it. This statement is designed to give you that information.

Please note: When we've collected personal data from you in the past, we have done so in line with data protection legislation.

What is personal data and what sort of personal data do we hold?

The information we hold which relates to an identified or identifiable living person is known as 'personal data'. Personal data is subject to certain legal safeguards under the Data Protection Act 1998 and, with effect from its coming into force, the European General Data Protection Regulation (Regulation (EU) 2016/679) plus any subsequent legislation the Government puts in place to replace the Data Protection Act 1998 and/or supplement that European Regulation (in this statement, we will call this body of legislation the 'Data Protection Legislation').

This statement applies to the personal data that we hold about Scheme members, their dependants and all other persons in respect of whom benefits are or may be payable under the Scheme. In this statement, we will call those individuals the 'Data Subjects'. The personal data that we hold, collect, use, share and store in relation to a Data Subject may include the following:

- name
- age
- contact details, for example, address, email and telephone number
- date of birth
- national insurance number
- gender
- marital status and information relevant to a claim for benefits following death (such as the name of your spouse or partner and other dependants)
- health
- employment details, for example, length of employment and salary
- financial details, for example, bank account and tax details
- information about a criminal conviction if this has resulted in you owing money to Civica and where Civica may be reimbursed from your benefits.

Sometimes you may provide personal data directly to us, for example, following a direct request for information from us or by providing us with details about your dependants. Where you have provided us with personal data about other individuals, such as your spouse, partner, dependants or any other potential beneficiary, please ensure that those individuals are aware of the information contained within this notice.

We may approach third parties such as former employers, regulatory authorities or tracing agencies to collect personal data (for example, we might seek information from some or all of those third parties in the event we are unable to contact you at the last address we hold for you and we need to get in touch with you about your Scheme benefits). We may also collect personal data even if an individual is no longer working for Civica.

Where we obtain information concerning certain ‘special categories’ of particularly sensitive data, such as health information, extra protections apply under the Data Protection Legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing. However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Why we hold personal data and how we use it

In their role as data controllers, the Trustee hold and process personal data about you for the proper handling of all matters relating to the Scheme, including its general administration and management, calculating, securing and paying Scheme benefits and managing the Scheme’s liabilities.

Data Protection Legislation requires that, where we process your personal data, we must satisfy at least one prescribed legal basis for processing. We rely on one or more of a number of such conditions when processing your data as follows:

- where necessary for the performance of our legal duties as Trustee of the Scheme and/or where otherwise required by law
- where it is in our legitimate interests to, among other things:
 - with your explicit consent (for example, where we use sensitive personal data such as medical information in the event you claim an ill-health early retirement pension), or
 - where the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.

On the basis of the above legal bases, we may process your personal data for all or any of the following ways:

- to contact you to assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits
- to identify your potential benefit options and, where relevant, implement those options
- to allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements
- to comply with our legal and regulatory obligations as Trustee of the Scheme
- to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Scheme
- to manage the Scheme’s liabilities, including the entering into of insurance arrangements and selection of Scheme investments
- for statistical and financial modelling and reference purposes
- in connection with any merger, reorganisation or other corporate activity concerning Civica
- to prevent, detect and investigate fraud, money laundering and other crimes.

How we store personal data

We follow strict security procedures for storing and sharing personal data, as required by Data Protection Legislation.

We store personal data for as long as we need for the purposes set out above or as required by applicable law. This will normally mean that we keep your personal data for as long as you are entitled to benefits from the Scheme and for so long afterwards as may be required to deal with any questions, complaints or claims that we receive about the administration of the Scheme. We may also retain your personal data for a longer period to comply with our legal and regulatory obligations.

How we share personal data with others

We will keep your personal data confidential, but we may share it in certain circumstances, for the purposes set out in this statement, with the following (who will have separate obligations under Data Protection Legislation):

- Civica, in its capacity as sponsor of the Scheme, Civica's advisers and, potentially, any organisation that merges with Civica or acquires any of Civica's functions
- the Trustee's scheme administration services provider
- the Trustee's other service providers and agents including the Scheme's actuary, auditor, legal adviser, investment consultant, tracing agencies and each of those service providers' relevant subcontractors
- in certain circumstances fraud prevention agencies
- the Trustee's insurers
- the Trustee's banks.

We may also share your personal data:

- with UK and overseas regulators, public bodies, Government bodies, the courts, dispute resolution bodies and law enforcement organisations in connection with their duties
- with any other person or organisation in relation to restructuring the Scheme, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both)
- if we have a duty to reveal it, if it is needed to manage your pension, if a law or regulation allows us to do so, for other legitimate purposes or with your permission.

In some instances, advisers and service providers will be data controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the Data Protection Legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. As a joint Data Controller for the Scheme, please note that the Scheme Actuary's Fair Processing Notice has also been updated. If you would like more information please contact Mercers Data Protection Officer by emailing EB_DataProtection@JLTGroup.com.

In addition, where we make Scheme investments or seek to provide benefits for Scheme members in other ways, such as through the use of insurance or pension scheme mergers, then we may need to share personal data with providers of investments, insurers and other pension scheme operators. In each case, we will only do this to the extent that we consider the information is reasonably required for these purposes.

We won't share or transfer personal data to third parties for marketing purposes.

Transferring data overseas

We, or fraud prevention agencies, may transfer your personal data outside the European Economic Area (EEA). If this happens we, or the fraud prevention agencies:

- are required to ensure that the organisations to which we transfer your personal data apply an equivalent level of protection as that given in the EEA
- are required to impose contractual obligations on the recipients of that personal data to protect your personal data to the standard required in the EEA
- may require the recipient to subscribe to international frameworks intended to enable secure data sharing.

If we transfer your personal data, we may transfer it to a country deemed by the European Commission to provide adequate protection of your personal data or where you have consented to the transfer.

If we transfer your personal data outside the EEA in other circumstances (for example because, by law, we have to reveal the information), we will make sure that sharing the information is lawful. You can request copies of the appropriate safeguards that we have in place by contacting us (see 'Contact us' below).

Your rights

You have rights concerning the way that we use your personal data. You have the right to:

- request that we send you (or a nominated third party) a copy of the personal data that we hold about you
- request that we correct or erase any incorrect or incomplete personal data that we hold about you (we will correct any personal data that we believe is incorrect or incomplete)
- request that we stop using your personal data (we will do so where there is no legal reason for us to continue to hold or use that personal data)
- object to any automated decision-making
- ask us to transfer a copy of your personal data to you or to another service provider or third party, where technically feasible
- withdraw any consent that you have given to our use of your personal data.

To exercise any of the rights set out above, or to discuss any other issue or complaint you may have in relation to your personal data, please contact us via the methods set out in the 'Contact us' section.

You also have the right to lodge a complaint in relation to this privacy statement or the Trustee's processing activities with the Information Commissioner's Office. Their contact details are:

Information Commissioner's Office Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 0303 123 1113 / 01625 545 745 Fax: 01625 524 510 Email: casework@ico.org.uk

Please note that the personal data we hold is used to administer Scheme benefits and we may from time to time ask for further information from members and beneficiaries for this purpose. If you do not provide such information when requested or ask that your personal data we already hold is deleted or restricted, this may affect the payment of benefits from the Scheme. In some cases, it could mean the Trustee is unable to put your pension into payment or have to stop your pension (if already in payment).

Changes to this statement

From time to time, we may make changes to this statement and related policies or procedures. We expect such changes to be rare. We'll let you know of any changes when necessary and the date on which they take effect.

Contact us

The Trustee's contact information is set out below, should you have any questions about the Trustee's use of your personal data or you otherwise need to contact them:

The Trustee of the Radius Group Pension Scheme
c/o Mercer
Post Handling Centre
St James's House
7 Charlotte Street
Manchester
M1 4DZ
Tel: 01392 356 638 Email: Radius@mercer.com