

## **PRIVACY NOTICE**

### **for the Unipart Group Retirement Benefits Scheme (“RBS” or “the Scheme”)**

This notice is for members and beneficiaries of the RBS. It has been prepared by UGC Retirement Benefits Trustees Limited in its capacity as the Trustee of the RBS, referred to as "the Trustee" or "we".

This notice will also be available on the Scheme's website - <https://www.unipartpensions.com/unipart-group-retirement-benefit-scheme/>

#### **Why we are providing this notice to you**

As the Trustee of the Scheme we hold certain information about you (“personal data”) which we need to administer the Scheme and pay benefits from it. This notice aims to provide you with information on the data we hold about you, where we obtained it from, how we use it, the purpose, your rights under the relevant legislation and what safeguards are in place to ensure it is protected. You do not need to take any action in response to this notice.

#### **The technical bit**

The Trustee holds personal data about you in its capacity as data controller for the proper handling of matters relating to the Scheme, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) to satisfy our legal obligations as Trustee of the Scheme;
- b) for the legitimate interests of administering the Scheme and calculating and paying benefits from the Scheme and to perform our obligations and exercise any rights and discretions the Trustee has in relation to the Scheme; and/or
- c) because we need to process your data to meet our contractual obligations in relation to the Scheme, or to take steps, at the request of a member, before entering into a contract.

#### **What data we hold**

The types of data we hold and process about you include:

- Contact details, including name, address, telephone numbers and email address;
- Identifying details, including date of birth and national insurance number;
- Information relating to your membership of the Scheme that is used to calculate benefits, for example length of service and salary information;
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details;
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death; and
- In certain cases, information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Scheme. (This is considered a "special" category of data – see more information about this below).

#### **Where we have obtained your data from**

We obtain, or have obtained, some of this personal data directly from you. We may also obtain or have obtained data from your employer (for example salary information) and from a variety of other sources including public databases (such as HMRC).

## Special category data

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. If we do need your consent in a particular case, we will ask you for it. You do not have to give your consent and you have the right to withdraw your consent to the processing at any time by notifying the Trustee. 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. (We may also need to retain some or all of the data for the defence of legal claims).

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained within this notice. In the event that any personal data pertaining to children aged 13 years and below is processed, it will be treated with the same regard as other personal data.

## How we will use your personal data

We may use this data to deal with all matters relating to the Scheme, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- 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.

## Organisations that we may share data with

From time to time we will share your personal data with other organisations so that they can help us carry out our duties and exercise our rights and discretions in relation to the Scheme. The types of organisations we may need to share some of your information with are:

- Scheme Administrator:
  - Capita Pension Solutions Limited  
<https://www.capita.com/privacy-notice>
- Legal advisers:
  - Sacker & Partners LLP  
<https://www.sackers.com/more/privacy-notice/>
  - Clifford Chance LLP -  
[https://www.cliffordchance.com/Legal\\_statements/privacy\\_statement.html](https://www.cliffordchance.com/Legal_statements/privacy_statement.html)
  - MacFarlanes LLP  
<https://www.macfarlanes.com/privacy-policy/>

- Scheme Actuary:
  - Paul McGlone, Aon Solutions UK Limited  
<https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>
- Actuarial consultants:
  - Aon Solutions UK Limited  
<https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>
- Investment advisers:
  - Lane Clark & Peacock LLP  
<https://www.lcp.com/third-party-privacy-notice>
- Auditors:
  - Assure UK Limited  
<https://assureuk.co.uk/privacy-policy/>
- Additional Voluntary Contribution provider:
  - The Prudential Assurance Company Limited  
<https://www.mandg.com/pru/customer/en-gb/footer/privacy-security>

In some instances, advisers and service providers will be 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. Further information may be provided to you in a separate notice or may be provided on the advisers' and service providers' websites.

We may also provide some of your data to Unipart Group Ltd, Unipart Group of Companies Limited and any relevant subsidiaries or parent companies to help them make decisions.

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.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to government bodies and dispute resolution and law enforcement organisations – including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and Her Majesty's Revenue and Customs (HMRC).

### **International data transfers**

In some cases, these recipients may be outside the UK / the European Economic Area (EEA). This means your personal data may be sent to a jurisdiction that may not have similarly strict data privacy laws. In those cases, we will ensure our arrangements with any relevant third parties are governed by data transfer agreements, designed to ensure that your data is protected, on terms approved for this purpose by the European Commission.

### **Automated decision making**

We do not carry out any automated processing for marketing purposes using your personal data and will not share this data with anyone for the purpose of marketing to you or any beneficiary.

## How long we keep your data

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) 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 may receive about our administration of the Scheme. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

## Data security

We are committed to protecting the confidentiality and security of your information. We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have legitimate grounds to do so. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Your rights

In certain circumstances, you have the following rights under data protection legislation to your personal information:

- to know what information we hold about you ('right to be informed')
- to request access to or a copy of the information we hold about you ('right of access')
- to have your data corrected if it is inaccurate ('right to rectification')
- to have your data erased where we do not have an overriding legal obligation or reason to retain it ('right to erasure')
- to prevent your data being used, if you have contested and are pending resolution in relation to its lawful use, accuracy or impact of your rights, or require that it is retained in relation to a legal claim ('right to restriction of processing')
- to object to its use, including opting out of receiving marketing such as our newsletter ('right to object')
- to request that we pass data about yourself that you provided us to another organisation on your behalf ('right to data portability').

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Scheme Administrator as indicated below.

These rights are not absolute and will only apply in certain circumstances. As such, each request is considered on a case-by-case basis and when we do reject a request, a response will always be provided to the data subject to explain why.

We aim to respond to all valid requests within one month. However, it may take us longer if the request is particularly complicated or you have made several requests. We will always notify you if we think a response will take longer than one month. This period begins at the point we have been able to verify your request, not necessarily at the point you make the original request.

## Changes to this notice

**We reserve the right to update this notice at any time.** Any changes will be posted to the Scheme's website and the updated policy will also be available on request from the Scheme Administrator. Please check for any changes if you are using a printed copy of this notice.

## **Your right to complain**

You also have the right to lodge a complaint with the supervising authority, the Information Commissioner's Office (ICO) at any time. For further information, please refer to the ICO website, [www.ico.org.uk](http://www.ico.org.uk)

## **Contacting us**

In order to enable us to meet our legal obligations, you should notify the Scheme Administrator of any changes to your personal details (e.g. address or other contact details) as soon as possible.

You can contact the Scheme Administrator;

- by telephone on 0344 391 2421
- by email to [unipart@capita.com](mailto:unipart@capita.com)

If you would like to exercise your rights as a data subject, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, you may contact the Scheme Secretary;

- by email to [group.pensions@unipart.com](mailto:group.pensions@unipart.com)
- by post to the Scheme Secretary, Unipart Group Retirement Benefits Scheme, Unipart House, Garsington Road, Oxford OX4 2PG

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