

Unity Trust Bank Pension Scheme

Data privacy notice

Purpose of this notice

This notice aims to give you information on how personal data regarding your membership of the Unity Trust Bank Pension Scheme (“the Scheme”) is collected and processed.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

We may update this privacy notice from time to time. We will provide you with a new privacy notice when we make any substantial updates.

Data controller

We, the Trustee of the Scheme, are the “data controller” of the personal information collected and used by the Scheme. This means we are responsible for deciding what personal data about you is required and how it should be protected.

In addition, the Scheme Actuary (Ian Banks of First Actuarial LLP) and our actuarial advisers (First Actuarial LLP) act as joint data controllers with the Trustee for the personal data that they use. The following parties may also be acting as data controllers or joint data controllers in relation to personal data about Scheme members:

- The Scheme’s auditors: Assure (UK) Limited;
- The Scheme’s legal adviser: Pinsent Masons LLP.

This privacy notice also covers these data controllers and joint data controllers. In some circumstances, the parties listed above may also be acting as the Trustee’s data processors in relation to personal data about Scheme members.

What personal data do we hold and use?

We hold personal data on you to enable us to calculate and pay benefits to you or your dependants. The information will also be used, where necessary, for the financial management of the Scheme.

The information we hold on you includes:

- details of your employment history, including salary information while you were an active member of the Scheme, together with your dates of joining and leaving the Scheme
- personal information including your present and former names, date of birth, National Insurance number and contact details
- records of benefits transferred into the Scheme from other pension arrangements, including from The Co-operative Pension Scheme (Pace)
- records of any additional contributions you or your current or former employer, on your behalf, have paid into Pace or its predecessor schemes

- information on benefits you will receive, or are receiving, from the Scheme. This information may include historic details of the benefits you have received from the Scheme or from Pace in the past
- your bank account details (but only from the time we need to start paying benefits to you)
- present and former names, date of birth, National Insurance number and contact details of any dependants or other persons who may become eligible to receive a benefit from the Scheme after your death
- any expressions of wishes about the application of money payable on your death, including expressions of wishes you provided to Pace
- details of past correspondence that you, or your agent or financial adviser, may have had with the Scheme or with Pace.

Why do we hold this information?

We hold this information because we have a legitimate interest in ensuring that you and/or your dependants or nominated beneficiaries get the benefits you are entitled to receive, to ensure that the Scheme is well-run and has sufficient funds to pay the benefits promised.

We also hold and use this information so that we can perform the contract we have with you by virtue of your membership of the Scheme, for example to ensure that you and your dependants receive the benefits you are entitled to receive.

We may also use it to comply with our legal obligations, for example in calculating whether the Scheme has enough money to pay future benefits, and to prepare the Scheme's audited accounts and financial statements.

We may also occasionally hold and use more sensitive data (also known as "special categories of data") such as health information. We may need this sensitive data if it is necessary for us to pay ill-health benefits to you, or death benefits to the people you have nominated.

The joint data controllers listed above also hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing advice or services to us in connection with the Scheme. For example, the Scheme Actuary carries out calculations to advise us if the Scheme has enough money to pay the future benefits promised to members. These joint data controllers may also need to hold some of your personal data in order to comply with their contractual obligation to the Trustee of the Scheme.

Where did we get our information about you?

The personal data we hold about you has been given to us by:

- **Pace** who provided us with details of the benefits you had earned up to the date they were transferred to the Scheme, together with supporting information about your membership of the Scheme.
- **Unity Trust Bank**, who provide us with data such as (where relevant) your salary information, part-time working details, and information about when you joined and left employment.
- **You**, or your family, for example when you contact the Scheme to discuss your benefits, to tell us about a change of address, to provide a death benefit expression of wish form or for other reasons.

In addition, we may also acquire information about you from publicly-available sources, for example using tracing agencies. You may also consent to us obtaining information

from third parties, such as your GP in connection with an application for ill-health early retirement.

Who do we share information with?

To run the Scheme, your personal information will be used by the Scheme Administrator and our advisers, as necessary, including the data controllers and joint data controllers identified above, or any other organisations that the Trustees appoint in future to replace those parties. From time to time, we may also need to share your personal information with other parties, such as insurance companies and providers, tracing agencies (for example, if you move to a new house and don't tell us your new address).

We may share your data with other third parties in future, such as:

- official organisations who we have a legal obligation to provide information to. These include HMRC and The Pensions Regulator
- financial advisers and other pension schemes, for example if you ask us to transfer your benefits to another scheme
- we may also provide personal information to another related scheme, if the Trustee believed it would be in your interests to consider merging the Scheme with that related scheme
- Unity Trust Bank, or their advisers, to enable them to manage their financial commitment to the Scheme, to produce pension-related accounting disclosures and to allow them to answer questions you may have about your benefits or to give you guidance on pension-related matters.

We only share information about you where it is necessary for the running of the Scheme. We do not share information about you for any other reason.

How long do we keep your data?

We will keep information about you for the lifetime of the Scheme.

Should we change the administrators, advisers or other parties who help us to run the Scheme, we will ensure the previous providers pass your personal data onto the new ones and agree a policy with us to erase any other copies of your personal information after a suitable period.

Your rights

You may ask for a copy of the information we hold about you. You may make this request by contacting us.

If, at any point, you believe the information we hold on you is wrong, you can ask us to correct it.

In some circumstances, you may also have a right to ask us to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

If you wish to raise a complaint on how we handle your personal data, you can contact us in order to have the matter investigated. If you are not satisfied with our response or believe the way we are processing your personal data is not in accordance with the law, you can complain to the Information Commissioner's Office.

Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information, such as your address, changes so that we can continue to pay your benefits when due and contact you about your membership of the Scheme.

Contacting us

You may contact us with any questions about this privacy notice, or any requests to exercise your rights in respect of your personal information, via the Scheme Administrator, whose contact details are:

Unity Trust Bank Pension Scheme
C/o First Actuarial LLP
Trafford House
Chester Road
Manchester
M32 0RS

Tel: 0161 348 7498

Email: unity.pension@firstactuarial.co.uk

**Issued by the Trustee of the Unity Trust Bank Pension Scheme
August 2023**