

Privacy Notice

University of Manchester Superannuation Scheme (the Scheme)

Background

The Trustee of the Scheme (the Trustee) is responsible for the governance and management of the Scheme, which includes ensuring both we, and our advisers, are responsible for compliance with legislation, including data protection legislation. Data protection legislation is extremely important to ensure that personal information is kept securely and used only for the right purpose.

From 25 May 2018, the law changed to tighten further the protection of personal data. This doesn't just apply to pension schemes; it applies to each company and organisation in Europe (including the UK) that has access to personal data.

This policy explains:

- What we mean by personal data;
- What information the Trustee may collect from or about you;
- What the Trustee uses your information for;
- Who the Trustee may share your information with. The personal data that our advisers hold is never sold on to other organisations and is never used so that other organisations can sell you their product or services;
- Your rights regarding the personal information you provide to us.

What do we mean by personal data?

By personal data we mean data relating to an individual by which they can be identified; for example your date of birth and address.

What information will we collect from or about you?

The information about you that we collect and process may be provided from a number of sources including by you; your employer or a previous employer; HM Revenue & Customs (HMRC); a tracing agency who may use a range of sources such as the electoral e.g. if we are trying to trace you; and (with your consent) your doctor.

This information may include some or all of the following:

- Personal details such as name (including former names), date of birth, sex, contact details (e.g. home address and former addresses, telephone numbers and e-mail address), identifiers such as National Insurance (NI) number.
- Employment and pension scheme membership details such as dates of joining and leaving employment (including reason for leaving, where relevant to benefit calculations) and employment

history (e.g. whether part-time or full-time, periods of absence and job title), periods of pensionable service, earnings, and details of other benefits.

- Details of pension contributions and benefits, such as compulsory and voluntary contributions, actual or potential defined benefits and defined contribution account information.
- Other financial details such as other pension arrangements, relevant tax, and National Insurance (NI) details (e.g. bank sort code and account number, tax code, Lifetime Allowance, and other protections), deductions from pension payroll.
- Details of family and social circumstances such as current marriage or civil partnership, any previous relationships and dependants, death benefit distribution information (including expression of wish forms).
- Copies of identification and similar documents (e.g. birth, marriage, civil partnership and death certificates, passport identity pages, decree absolute)
- Court orders such as pension sharing and earmarking orders and attachment orders.
- Information about physical or mental health where there is a legal basis to do so to determine and provide benefits.

Our use of your personal data

We must have a legal reason to use your personal data and this will usually be:

- to comply with legal or contractual requirements;
- for the performance of contractual requirements;
- for the legitimate interests of administering the Scheme; or
- with your consent.

We may ask you to consent to us processing information in some circumstances. For example where personal data collected is categorised as a special category of personal data (such as information about your health if retiring on grounds of ill health) and there is not an alternative legal basis for processing it we may ask for your consent.

If we do not have your consent, it may mean that we are unable to pay benefits to you or your dependants. You can withdraw consent at any time by writing to us using the contact details given below.

When you provide personal information about your beneficiaries the Trustee and our advisers assume that you do so with their full knowledge and consent.

Purposes of processing the data

We collect and process your data based on the lawful reasons set out below:

We rely on our legitimate interests in processing your data:

- To run mortality and address checks against member records to ensure information is correct and to prevent and detect fraud.
- For risk management purposes, including the insurance or management of longevity risks and obtaining quotations for annuities or other insurance products.

We process your data where it is necessary for us to comply with legal obligation such as:

- To trace you and other beneficiaries.
- To establish your identity and eligibility for benefits (including following divorce or death and in cases of ill-health early retirement).
- To calculate and reconcile contributions.
- To calculate and pay pension benefits, and deal with any queries about these.
- To communicate with you about your benefits and the pension scheme in general.
- To pay tax charges, monitor whether allowances are exceeded and report to HM Revenue & Customs.
- To assist with the Trustee's compliance with legal obligations, such as reporting to relevant authorities and government bodies.
- To prepare scheme accounts and assist the Trustee's auditors.
- To carry out actuarial, statistical, and financial modelling calculations in order to advise the Trustee about pension scheme funding and investment matters.
- To comply with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes.

Who might we share this data with?

The Trustee and our advisers will share your personal data with each other as necessary and with other advisers and service providers used to help administer the Scheme. This may include the Scheme's: legal advisers, investment advisers, auditors, and accountants. It may also include other organisations such as tracing, archiving, document printing and distribution and IT service providers. If you require details of any of these advisers/providers, please contact us using the details given below.

In some circumstances, we may need to pass personal information to other third parties who advise or assist the Trustee and our advisers, the sponsoring employer, your employer, Government bodies, fund providers, insurance companies and persons associated with you. In the event that any such third-party processes personal information, reasonable steps will be taken to ensure that such third party agrees in writing to act only on our instruction and provides appropriate guarantees in respect of the technical and organisational security measures governing the processing to be carried out.

We may also pass personal information to other third parties at your request, for example where you are considering a possible transfer and you have asked us to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation we will assume that you have satisfied yourself that the third party has suitable security measures in place.

How long do we keep your personal data?

We will keep your personal data, in accordance with the law and regulatory guidance, for as long as is necessary for the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Scheme. When no longer needed, we will seek to ensure that personal data is securely destroyed.

Your rights

You have the right to:

- a copy of your personal data held;
- have your data corrected if it is inaccurate or incomplete;
- have your data deleted or removed if it is no longer necessary for the purpose of administering the Scheme;
- restrict the processing of your data;
- withdraw any consent you have given in respect of your personal data;
- data portability - to obtain and reuse your data for your own purposes.

If you wish to exercise any of these rights, please contact us using the contact details below. We will aim to respond to any request received from you within one month of receiving your request. Access to your data will usually be provided free of charge.

Contact details

You do not need to take any action as a result of reading this but if you have any questions, please contact the Scheme Secretary at ash.field@manchester.ac.uk or by writing to him at:

Pensions Office, University of Manchester
John Owens Building
Oxford Road
Manchester, M13 9PL

Complaints

If you are not happy with the way your personal data is held or processed, please contact us at the address above.

You also have the right to complain to the Information Commissioners Office (ICO) using the following contact details:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire
SK9 5AF

Tel: 0303 123 1113
Email: casework@ico.org.uk

More information is available on the ICO website at <https://ico.org.uk/>.

Updates to this notice

We may update or amend this privacy notice from time to time to comply with law or to meet changing business requirements.