

RINGWAYS RETIREMENT AND DEATH BENEFITS SCHEME (THE “SCHEME”)

PRIVACY NOTICE

WHAT IS THE PURPOSE OF THIS DOCUMENT?

We are the trustees of the Scheme (“**Trustees**”, “**we**”, “**our**” and “**us**”).

As the Trustees of the Scheme, we are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you and your dependants in relation to the administration of the Scheme including the payment of benefits to you and your dependants.

This privacy notice applies to (i) all deferred and pensioner members of the Scheme, (ii) spouses and other dependants in receipt of a pension from the Scheme, (iii) contingent beneficiaries, and (iv) former members in relation to whom we hold records.

Under current UK data protection law, the Trustees of the Scheme are a “**data controller**”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Please note that where you provide / have provided us with personal information about your dependants, you must provide them with a copy of this privacy notice.

DATA PROTECTION PRINCIPLES

In our capacity as a “data controller” we are required to comply with data protection law. The law sets out that any personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.

4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, store, and use the following categories of personal information about you:

- **Personal identifiers:** such as your: name, age or date of birth, gender, contact details (including current address, previous addresses, email address, telephone number), IP addresses, passport information, information contained in utility bills and copies of birth, adoption, gender recognition, marriage, civil partnership and death) certificates.
- **Scheme membership and employment periods:** such as dates of joining and leaving service, periods of part-time service, periods of absence.
- **Employment financial details:** such as earnings (basic and additional earnings) and National Insurance Contributions
- **Contribution details:** such as contributions to the Scheme and any additional voluntary contributions.
- **Benefit details and information to calculate benefits:** including current accrued benefits, contracted-out status, benefits that have been paid (including: lump sum benefits, refund of contributions, pensions in payment, transfers to other schemes) and details of transfers in.
- **Tax information and other financial information:** such as: tax code, National Insurance details, bank account information, lifetime allowance information.
- **Family information:** including information on dependants, nominated beneficiaries on death, divorce details, (including attachment and earmarking orders).

We may also collect, store and use “**special categories**” of more sensitive personal information about you and/or your dependants and beneficiaries. This may include

information relating to medical conditions, health and sickness records. Further information regarding how we collect, store and use this information can be found in the section headed “Sensitive personal information” below.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

Personal information is collected when members first apply to join the Scheme and further information is collected during the course of membership.

In the case of a spouse or dependant, personal information may be collected from an expression of wishes form completed by the member, and/or by the Trustees or Scheme's administrator in the course of deciding who should receive benefits following a member's death.

We may also receive personal information from other parties such as: your employer, your former employer, HM Revenue & Customs, the Pensions Ombudsman, former Scheme trustees and service providers who provide tracing or data cleansing services.

Personal data relating to the Scheme is held on paper and on computer systems.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to (our “**legal basis**”). Most commonly, we will use your personal information when at least one of the following legal bases applies:

1. Where we need to comply with a legal obligation.
2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
3. Where it is necessary for the performance of a contract to which you are a party.

Situations in which we will use your personal information

As noted above, we need all the categories of information in the list above (see The kind of information we hold about you) primarily to enable us to comply with our legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. In other cases we may use your information to perform a contract or in contemplation of you entering a contract.

In simple terms, we use your personal information to administer the Scheme, including the calculation and payment of pension benefits. In particular, we use your personal data for the purposes set out in the list below. We have indicated, using headings, the legal basis which applies to each purpose.

1) To comply with our legal obligations

- Establishing the identity of the member or dependant
- Establishing eligibility for benefits
- Providing benefit quotations and other benefit statements, identifying potential benefit options and alternative ways of delivering benefits
- Calculating and settling benefits including the payment of pensions, AVCs, lump sums and transfer values
- Keeping Scheme and member records
- Managing members' funds, ensuring monies are recorded, invested and disinvested accordingly
- Updating and retaining Scheme and member records
- Demonstrating past compliance with duties
- Preparing trustee administration reports
- Issuing communications and information
- Responding to queries, complaints and disputes
- Carrying out the actuarial valuation and calculations
- Calculating and reconciling contributions
- Paying tax charges, monitoring whether allowances are exceeded and reporting to HMRC
- Ensuring compliance with contracting-out requirements
- Preparing scheme accounts, audits and The Pensions Regulator's scheme return
- Providing reports to HMRC, The Pensions Regulator and other regulatory bodies of competent jurisdiction

- Providing information to qualifying pension dashboard providers and any other organisations we are required to provide information to in order to comply with our obligations under The Pensions Dashboards Regulations 2022.
- 2) To pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests)
- Sharing information with the employer and other third parties to ensure the efficient administration of the Scheme (see pages 6, 7 and 8)
- Carrying out liability management exercises
- Obtaining or preparing quotes for annuities or other insurance products in order to secure the liabilities of the Scheme
- Purchasing annuities or other insurance products in order to secure the liabilities of the Scheme

Some of the above legal bases for processing will overlap and there may be several bases which justify our use of your personal information. Where the Trustees process your personal information for the purposes of complying with a legal obligation, the source of the legal obligation may be found in legislation governing the administration of pension schemes or common law fiduciary duties including the duty to act in accordance with the Scheme's governing documentation, the Trust Deed and Rules.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to calculate your pension benefits or to arrange payment of them.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SENSITIVE PERSONAL INFORMATION

“**Special categories**” of more sensitive personal information (described on page 2) require higher levels of protection. We will use your sensitive personal information – typically in relation to the payment of ill-health benefits. -

We need to have further justification for collecting, storing and using this type of personal information. As such, we will only process sensitive personal information in the following circumstances:

- With your explicit written consent; or
- Where the processing is necessary for the establishment, exercise or defence of legal claims.

For example, if you apply for an ill health pension, in almost all cases you will be asked to provide your written consent to the processing of your medical information by the Trustees. The Trustees, and any medical adviser appointed by the Trustees will need to review your medical information to determine your eligibility to receive an ill health pension. If, however, it is impractical to obtain your written consent we may rely on the “legal claims” condition which applies where the processing of sensitive personal information is necessary for the purposes of establishing or exercising legal rights. In the context of ill health, your medical information would be used to establish your rights (if any) to receive an immediate pension from the Scheme.

DATA SHARING

In order to carry out the functions set out in above, we share, or may share, your personal information with the following categories of third party recipients:

- D.M.Keith (WE) Limited (company number 00758842) as the principal employer of the Scheme and other entities in the D.M.Keith Limited (company number 00749256) group of companies. Personal information will be shared with the principal employer of the Scheme, where it is in the legitimate interests of the employer. For example, information regarding the Scheme (including your personal information) may be needed to carry out a feasibility study in relation to a liability management exercise or the purchase of insurance contracts to secure the liabilities of the Scheme. Where personal information is shared, D.M.Keith (WE) Limited shall protect your data in line with its privacy notice.
- First Actuarial the administrator of the Scheme (the “**Scheme Administrator**”) who is responsible for day-to-day administration of the Scheme on behalf of the Trustees. First Actuarial is a data processor and is required by law to keep your

information secure. First Actuarial may appoint one or more sub-processors to carry out some of the administration services and, in these circumstances, your personal data may be shared with First Actuarial's sub-processors. First Actuarial remains legally responsible for the security of your personal information. For further information regarding sub-processors, please contact the Trustees.

- Mark Riches who is the Actuary to the Scheme (the “**Scheme Actuary**”) and calculates the funding position of the Scheme as well as individual member benefits. The Scheme Actuary and First Actuarial are joint data controllers of the personal data they use in the provision of services to the Scheme. A copy of their privacy notice can be found at:
<https://privacy.firstactuarial.co.uk/Notices/PensionSchemeMembers>
- Aberdeen Standard Investments who are the provider of Additional Voluntary Contributions for members who made additional contributions.
- The Scheme's professional advisers including, auditors, investment advisers and lawyers. Wrigleys Solicitors LLP are the current legal advisers to the Scheme. For an up-to-date list of the Trustees' professional advisers and details of their privacy notices, please contact the Trustees.
- Medical advisers, when you are being considered for ill-health benefits.
- Regulatory bodies including H M Revenue & Customs, the Department of Works & Pensions and The Pensions Regulator.
- Industry bodies where you have consented to disclosure such as the Pension Ombudsman, the Money and Pensions Service (including MoneyHelper).
- Other pension schemes or insurers who receive assets in respect of members on either an individual basis or as part of a bulk transfer.
- Annuity service providers for the purpose of providing annuity quotations.
- Insurance brokers, insurance companies and re-insurance companies for the purposes of liability and risk management services such as securing the liabilities of the Scheme.
- Tracing agents, who locate missing members and confirm continuing entitlement to benefits.
- Qualifying pensions dashboard providers or the Money and Pensions Service to ensure your up to date information is available to be requested via a dashboard service.
- Third parties you authorise information be disclosed to such as a financial adviser acting on your behalf

Will my information be transferred to other countries?

At this time we do not send any personal data to third parties outside of the UK.

DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Data processors will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

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

DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we (or others on our behalf) may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

In order to meet current UK tax and pension law requirements, we are required to retain certain personal information for a minimum of six years. This, for example, could include details about the pension paid to you during this period.

Once you are no longer a member of (or otherwise no longer eligible to receive benefits from) the Scheme we will securely destroy your personal information in accordance with our data retention policy.

The Scheme Actuary and First Actuarial may also keep a copy of your personal information in accordance with their data retention policy. Should we change our Scheme Actuary, First Actuarial will keep a copy of the data for a minimum of six years.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Scheme.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Trustees in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is

clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Trustees. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

COMPLAINTS

If you believe that we have infringed data protection legislation because of the way we have handled your personal information, you may make a complaint to the Trustees using the contact details set out at the bottom of this privacy notice. We will acknowledge your data protection complaint within 30 days and will keep you informed as we investigate and consider your complaint.

You also have the right to make a complaint to the Information Commissioner's Office (ICO) (www.ico.org.uk), the regulator and supervisory authority for data protection in the UK, regarding the processing of the personal information referred to in this privacy notice.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice or would like to exercise any of your rights in relation to your personal information, please contact the Trustees at the following address:

The Trustees of the Ringways Retirement and Death Benefit Scheme (c/o Julian Holmes)
D.M.Keith (WE) Limited
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West Yorkshire
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