

PRIVACY NOTICE

for the NRAM Pension Scheme (the “Scheme”)

This notice is for members and beneficiaries of the Scheme. It has been prepared by **NRAM Pensions Limited** (“Trustee” or “we”) in its capacity as trustee of the Scheme.

This privacy notice tells you about how and why your personal information is used generally in connection with the Scheme.

When you are using this website www.nrampensions.co.uk, the personal information that is collected about you will be limited to:

- any personal information you provide if you contact us using the contact details provided on the website;
- any personal information that is collected on the website through the use of cookies. See our cookies policy at www.nrampensions.co.uk for more details; and
- your log in details for the Intellisite portal, if applicable.

More details about how and why we use this personal information are provided below.

Why we are providing this notice to you

As the Trustee of the Scheme, we hold certain personal information (known as “**personal data**”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- your log in details (to allow you to access the Intellisite portal, where applicable)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender)

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- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits
- medical and other details about your health
- any other information you provide to us in connection with the Scheme

As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy at www.nrapensions.co.uk/cookies for further details.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme, calculate and pay benefits, provide you with access to the Intellisite portal, where applicable, and deal with any queries you raise. The Trustee also has a legitimate interest in processing the above information to administer, protect and improve the website. We also keep information in order to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation.

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death. We will not collect any personal data that we do not need.

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

As the Trustee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current, past or future employer

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- the Scheme’s professional advisers, including:
 - the Scheme actuary, currently Gavin Hamill, Willis Towers Watson (WTW)
 - the Scheme auditor, currently PwC
 - the Scheme medical advisers, currently AXA
 - investment advisers, currently Willis Towers Watson
 - lawyers to the Trustee, currently Squire Patton Boggs (UK) LLP
- the administration team who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee (currently Deloitte Total Reward and Benefits Limited)
- the provider of the Intellisite portal (currently also Deloitte Total Reward and Benefits Limited)
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions (currently LGIM)
- depending upon how we pay pensions, the personal data we have to supply in order to effect payment of pensions, whether in the UK or when pensions are being paid overseas
- the Scheme actuary has confirmed that he is also a “data controller” in respect of the personal data he holds relating to Scheme members. Our Scheme actuary works for Willis Towers Watson (WTW). A copy of the privacy notice relating to the role of Scheme actuary is available on WTW’s website at: www.willistowerswatson.com/personal-data
- the Trustee holds a bulk annuity contract with Aviva, who will hold member data. They too are a “data controller” and their privacy notice may be accessed at the following link: <https://www.aviva.co.uk/legal/privacy-policy.html/>

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life.

Your rights

Right of Access – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format

Right to Rectification – if at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected

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Right to Restrict processing – you can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved

Right to object to processing – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.

Withdrawing consent – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.

Right to be forgotten – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data
- please contact the Trustee using the contact details below.

Via email at: nrampensions@deloitte.co.uk.

Telephone at: 0113 292 1960

Or via post at: Trustee of the NRAM Pension Scheme
c/o Glen Cross, Secretary to the Trustee
Deloitte Total Reward and Benefits Limited
Lincoln Building
27-45 Great Victoria Street
Belfast
BT2 7SL

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: 0303 123 1113.

Updates to this notice

Valid from July 2020

This notice is the latest version as at July 2020. This notice will be updated from time to time and you can request a hard copy of the notice from Glen Cross (see “Who to contact” above).