

PDSA RETIREMENT BENEFITS PLAN (1978) PRIVACY NOTICE

The Trustee of the PDSA Retirement Benefits Plan (1978) (the “Plan”) needs to hold some personal information relating to you in order to administer your pension benefits. The Trustee is committed to protecting and respecting the privacy of your personal information. This Privacy Notice describes how we treat the information we hold about you.

This Privacy Notice explains the following:

- How we collect personal information about you
- What information we may collect about you
- What we may use your information for
- Who we may share your information with
- Your rights regarding the personal information you provide to us
- Technical information that we may collect about you
- How we keep your information safe
- How long we retain your personal information
- Special categories of personal data
- Changes to this Privacy Notice
- Contact details

By providing us with your personal information (or by allowing PDSA to provide us with your personal information), you agree to the processing of your personal information as outlined in this Privacy Notice.

For the purposes of the data protection laws applicable in the UK, including the Data Protection Act 2018 and the United Kingdom General Data Protection Regulation, the Data Controller is Whitechapel Associates Limited, Whitechapel Way, Priorslee, Telford, Shropshire, TF2 9PQ.

How we collect personal information about you?

Information you give us. You may give us information about you by filling in forms in hard copy or on the member website, or by corresponding with us by phone, e-mail, letter or in person. The information you give us may include your name (including previous names), date of birth, address, e-mail address and phone number, National Insurance number, financial information, any health issues that relate to you, marital / partnership status and other personal information required to determine the level of benefits to pay you or your beneficiaries.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Information we receive from other sources. The other main source of information about you is your employer or former employer, who may have provided us with some of the information listed above when you joined the Plan or may have provided us with updates as

that information changed over the course of your employment with PDSA. In connection with any application for early payment of a pension on the grounds of incapacity we may also receive information about you from your doctor or other medical advisers.

Sometimes we get information from other sources: for example, another scheme if you have transferred benefits from that scheme; government departments such as HMRC and DWP; and publicly accessible sources (for example, the electoral roll) if we have lost touch with you and we are trying to find you.

Some of your personal information may be collected indirectly through the Pensions Dashboards 'ecosystem' (including the identity service, the pension finder service, the consent and authorisation service). Where we obtain personal information from the Pensions Dashboards ecosystem, or during the process of matching members with their Plan benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Plan.

What types of personal information may we collect about you?

We may hold any or all of the following personal information about you:

- Personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number, description of physical or mental health and identifiers such as National Insurance Number;
- Family, lifestyle and social circumstances such as details about current marriage and partnerships and marital history, details of family and dependents;
- Employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, attendance record, job title and job responsibilities, financial details such as income, salary
- Bank account details to process pension payments.
- Technical information and other information about your visits to the member website
- Electronic "pension identifiers" in relation to Pensions Dashboards
- Any other legitimate personal data relating to the Plan

What we might use your information for

The Trustee has a legal obligation as well as a statutory duty to administer the Plan in accordance with its governing documentation, ensure benefits are paid correctly and to provide members with certain information. In order to meet these obligations, the Trustee as the Data Controller has a legitimate interest, or in the case of the Pensions Dashboards Regulations, a legal obligation in processing your personal information for a number of purposes including the following:

- To administer the Plan including to process data to calculate and pay benefits
- In relation to any correspondence (including queries relating to your membership of the Plan) related to the administration of the Plan
- To notify you about changes to the Plan
- For statistical, financial modelling purposes (including the actuarial valuation)
- For internal record keeping

- For risk reduction exercises including the insurance of longevity risks and related demographic risks;
 - To comply with any present or future law, rule, regulation, guidance or directive and with any industry or professional rules and regulations or any applicable voluntary codes
 - To comply with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and with any subpoena or court process, or in connection with any litigation:
 - To comply with our legal obligations under the Pension Schemes Act 2021 and the Pensions Dashboards Regulations, we will process your personal data (name, date of birth, NI Number) to connect to the pensions dashboards ecosystem and enable you to find and view your pension information
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- In the case of our obligations to comply with Pensions Dashboards legislation, our activities may involve sharing member data with entities within the dashboards ecosystem and dashboards providers, as well as with the service providers we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties. Therefore, we may need to process some extra personal information about you, if we have this, such as electronic “personal identifiers”, previous or alternate names, your former address(es), your national insurance number, and any partial national insurance number.

Who we may share your information with

Personal information may be disclosed to persons who may be appointed to carry out part of the Trustee’s responsibilities, service providers of outsourced services or other agencies / companies who provide services to the Trustee, who are under a duty of confidentiality.

We may share or disclose your information to any of the following recipients as may be necessary or desirable to administer the Plan and / or comply with contractual obligations relating to it:

- The Plan’s administrator (Hymans Roberson LLP) who act as a Data Processor and processes member data on behalf of the Trustee.
- Service providers in connection with the Pensions Dashboards ecosystem, which include The Money and Pensions Service (MaPS) to enable MaPS to search our records. If a match is found, we will return pension information (both administrative and value data) to your chosen authorised dashboard provider.
- The Plan’s AVC providers (ReAssure, Prudential, Scottish Friendly Assurance Society Ltd)
- Other service providers, professional advisers and auditors (such as the Plan Actuary who also acts as a joint Data Controller with the Trustee)
- Annuity Providers, (Aviva)
- Pensioner buy-in provider (Aviva)
- Local or foreign regulators, governments and law enforcement authorities
- Local and foreign court, tribunals and arbitrators, other judicial committees or enactments of laws:
- Investment Managers
- PDSA for the purpose of sending out the member report

- PDSA for the purpose of sending out newsletters and Birthday and Christmas cards to members who have retired
- Insurance companies (such as Zurich) and Employee Benefits Consultants such as Healthwise
- With your consent, persons associated with you (such as a financial adviser or a family member)
- Administrators and trustees of other pension schemes if you transfer your benefits from the Plan to another pension scheme
- Other third parties where printing is outsourced
- Your data will also be shared with Club Vita LLP, who provide longevity (life expectancy) analytics and related information to help us manage the Plan's liabilities.
- Personal information may also be shared with other third parties to run mortality and address checks against member records to ensure information is correct and to prevent and detect fraud.
- The Trustee may also share your information with PDSA and its professional advisers (including Isio) in connection with its responsibilities towards the Plan
- In addition, we may share information with third parties when undertaking risk reduction exercises (such a further pensioner buy-in)

If 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 the Data Controller's instructions and provides appropriate guarantees in respect of the technical and organisational security measures governing the processing to be carried out.

Your rights regarding the personal information you provide to us

The accuracy of the information we hold about you is important to us. Under the United Kingdom General Data Protection Regulation, you have the right to access the information we hold about you and have any inaccuracies corrected.

If any of the information we hold about you is inaccurate or out of date or you object to us processing it, please let us know using the contact details below.

You have the right to ask the Trustee to delete or remove any personal data it holds in relation to you if:

- The personal data is no longer necessary for the administration and management of the Plan
- When you object to the processing and there is no overriding legitimate interest for the Trustee to continue the processing
- You withdraw your consent for the processing of your data where the Trustee has used consent as the basis for processing personal data (for example providing medical evidence in the case of an ill-health early retirement).

The Trustee will consider any request to delete personal data, however this request will be considered against the requirement to retain the data in order and the Trustee's legitimate interest to continue with the proper administration of the Plan and to meet any statutory and

legal obligations, as well as to establish and defend our legal rights, and to prevent and detect crimes such as fraud.

You also have the right make a complaint to the Trustee if you have any concerns over how we process your personal data. You can also complain to the Information Commissioner about how your personal data is processed including for example if you think there has been an infringement of data protection laws.

Information that we may collect about you

When you visit the member website, we may collect and process the following data about you:

Information that you provide by filling in forms on our site <http://www.pdsarbp.co.uk> (the site). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. You may be asked for information when you report a problem with the site.

- If you contact us, we may keep a record of that correspondence
- Details of your visits to the site including, but not limited to, traffic data, location data, blogs and other communication data, and the resources that you access.

IP addresses and cookies

We may collect information about your computer. We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive.

Cookies are small text files located in browser directories. Cookies are used to enhance a user's experience by ensuring the websites work efficiently, perform certain functions and to provide information to the website owners. Some of the cookies used are essential for the site to operate. We may collect information about your computer for system administration purposes including, where available, your IP address, operating system and browser type. This is statistical data about our users' browsing actions and patterns and does not identify any individual. Further information can be found at: <http://www.pdsarbp.co.uk/pdsa/privacy-policy-and-cookies/>

Keeping your information safe

We will use appropriate procedures and security measures to process and protect your information. We have contracts in place with our third party providers and regularly check that our providers process and store data in line with the principles of the United Kingdom General Data Protection Regulation.

How long will we retain your personal information?

The Trustee will consider on a regular basis, whether it is necessary to retain certain records. In doing so the Trustee recognises that pensions are long-term and it is not uncommon for queries or disputes to arise years after a member has left the service of PDSA or even after your pension has been put into payment. In addition, the Trustee may be required to provide evidence that a certain event has actually taken place (such as a transfer from the Plan to another pension provider).

As a general rule, therefore the Trustee has determined that it cannot permanently delete a member's record. Member details and documentation are required to be retained to enable the Plan to be administered in terms of its Rules as well as comply with any statutory or legal obligations. Records will therefore be retained for 10 years following the winding up of the Plan.

Data from the pensions dashboards ecosystem is kept for the life of your member record, if we do find a match (i.e. if you are a member of the Plan). If we don't find a match (i.e. you're not a member of the Plan), we will delete the data from the dashboard immediately. If we find a potential match, we will keep the data from the dashboard for up to 60 days in a secure form so that we have more time to determine whether there is a match or not. We will delete data after a maximum of 60 days if there is no match or keep it for the life of your member record if we do find a match.

Special Categories of Personal Data

Special categories of personal data include information such as your physical or mental health. The collection and processing of special categories of personal data is very strictly regulated. The Trustee will therefore process personal data that is sensitive personal data in accordance with the requirements of the United Kingdom General Data Protection Regulation.

It is the Trustee's policy to collect special categories of personal data only when absolutely necessary, for example, when considering an application for an ill-health early retirement or determining eligibility for a lump sum or dependant's pension following a member's death. You will be asked to provide your consent for the Trustee to see your medical information.

Changes to our Privacy Notice

Any changes we make to our Privacy Notice in the future will be included in the annual member report.

Contact

If you have any questions, requests or wish to complain about how we use your information, please contact us at:

By post:

Whitechapel Associates Limited (Trustee to the PDSA Retirement Benefits Plan (1978))
Whitechapel Way
Telford
TF2 9PQ

By email: waters-hewitt.karen@pdsa.org.uk

What if I am not satisfied with the response?

If you are not satisfied with the response you receive from the Trustee, you can contact the Information Commissioner giving details of your complaint or concerns.

The details are:

Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113

**Issued on behalf of Whitechapel Associates Limited
Trustee to the PDSA Retirements Benefit Plan (1978)**