

Privacy Notice

This privacy notice is being issued to you on behalf of the Trustees of the Advance Tapes Group Limited Retirement Benefits Scheme (“the Scheme”). Please read it carefully as it contains important information. You are not required to take any action.

We are sending you this notice because you are a member of the Scheme.

As Trustees, we process “personal data” about you in order to operate the Scheme and pay benefits to members and beneficiaries. We also share your personal data with some other people and organisations for specific purposes. Personal data is any information that could be used to identify you as a living individual.

This privacy notice describes what personal data we collect about you and other people (for example, your spouse, civil partner, partner or dependants).

It also describes how we process (i.e. handle) your personal data, the basis upon which we process it, with whom it is shared, how it is stored, how it is protected and what rights you have in relation to it (including a right to object to processing in certain circumstances).

What personal data do we collect about you and how?

We collect personal data from you in a number of different ways:

- you may share information with us (for example, when you joined the Scheme or when you apply for benefits),
- we may collect certain personal data from third parties (further details are given below), and
- we may also generate certain personal data as part of the operation of the Scheme (for example, information relating to your contributions and benefits).

We collect personal data from the following third parties:

- your current and/or former employers,
- any financial or other adviser or representative acting on your behalf and, if you want to transfer benefits, the trustees or managers of other pension schemes of which you are or have been a member,
- providers of services that allow us to verify the accuracy of your personal data (for example, to trace your current address or to verify your continuing existence), and
- government agencies (for example, HM Revenue and Customs (HMRC) or the National Insurance Contributions and Earnings Office (NICEO)).

We may collect and use the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependants:

- name(s),
- gender,
- National Insurance Number,
- employee and membership number,
- date of birth,
- home address and telephone number,

- personal e-mail address,
- marital status and family / dependants,
- your current or former employer,
- the date you joined and left employment and employment status, e.g. full or part time,
- dates on which you joined and left pensionable service,
- your salary information,
- your normal or anticipated retirement date,
- your status as a member of the Scheme,
- the circumstances of your retirement or leaving service,
- information relating to your health, e.g. in relation to incapacity benefits,
- information on criminal convictions,
- information relating to your benefits (including any contracted-out benefits),
- information relating to any money purchase benefits in the Scheme (including how these are invested),
- information relating to any pension sharing or earmarking order,
- tax information including your income tax band and any protections that you may have in relation to your pension benefits,
- your bank account details, and
- records of our communications with you, including any complaints.

In certain circumstances, we may ask you for personal information which is more sensitive. Examples would include where we ask for information that may reveal your racial or ethnic origin, religious beliefs, sex life or sexual orientation, criminal convictions, or information relating to your health (for example, if you cannot work any longer due to incapacity and you want to take your pension benefits early).

When we ask for sensitive information, we will only ask for as much information as we need. We will also explain to you why we need that information and how we intend to use it.

When we need to, we will ask for your consent for us to use your sensitive information. However, there are some instances in which we do not need your consent.

You may also need to provide us with personal data relating to other people (for example, your spouse, civil partner, partner or dependants). When you do so, you will need to check with them that they are happy for you to share their personal data with us and for us to use it in accordance with our privacy policy as set out in this privacy notice.

How do we use your personal data?

We primarily use your personal data for the administration of the Scheme, for example, to process any application to join the Scheme, to calculate and pay your benefits and any benefits arising on your death, to trace you should we lose contact with you, and other administrative activities that become necessary from time to time, including fraud prevention.

We also use your personal data to communicate with you in relation to your benefits, to deal with complaints, and to make disclosures at your request.

We also use your personal data for the wider operation of the Scheme; for example, we use personal data to calculate the value of the Scheme's liabilities and the amounts that the employer needs to pay to the Scheme, and to set our investment strategy. We may also use personal data to set up insurance policies to meet Scheme liabilities, for risk management purposes, to undertake liability management, bulk transfer and scheme merger exercises, or in connection with any proposal to make changes to the Scheme's benefits.

We may also use your personal data for the purposes of complying with any laws, procedures and regulations that apply to us and to establish, exercise or defend our legal rights.

We may occasionally use your personal data for the purposes of statistical analysis or to respond to government surveys (for example, questionnaires sent to us by the Pensions Regulator or the Office for National Statistics) but these are usually completed on an anonymous basis.

If we wish to use your personal data for any other purpose, we will update this privacy notice and where appropriate, provide you with details.

What is our lawful basis or ground for using your personal data?

Under laws that are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.

As Trustees, we have certain duties and powers, which are conferred on us by law or by the Scheme's governing documents. In most cases, our processing of your personal data is necessary for the performance of those legal duties and exercise of those powers.

Certain uses of your personal data, or other processing activities, will not be strictly necessary to perform our legal duties, or to exercise our powers; however, they will be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean our (or a third party's) interests in operating the Scheme as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

If we are processing personal data in a certain way because it is in our (or a third party's) legitimate interests (not, for example, because it is necessary for the performance of our legal duties), we must balance our legitimate interests against your rights and interests. You have the right to object to this processing.

In certain circumstances, we will need your consent to collect and use your personal data. This is most likely where we are collecting information relating to your health or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, sex life or sexual orientation. If we have asked for your consent, you may withdraw your consent at any time.

You may withdraw your consent, or object to our processing of your personal data in a certain way (where you have the right to do so), by contacting the Trustees using the contact details shown at the end of this notice.

It is important to note however, that if you withdraw your consent or object to our processing of your personal data, this may impact our ability to consider whether you are eligible to receive benefits, put your benefits into payment, and/or continue to pay benefits to you.

In what circumstances do we share your personal data?

We will share your personal data with the following categories of third parties:

- your current or former employer,
- our administrators – we delegate some of our duties as Trustees to administrators; they are effectively responsible for the day-to-day running of the Scheme,
- the Scheme Actuary – this is an actuary who is personally appointed to the Scheme to provide us with advice on the funding of the Scheme. The actuary will be supported by an actuarial team who will also have access to your personal data,
- our benefit consultants – they provide advice on all aspects of running the Scheme including the level and form of benefits to be provided to members of the Scheme, investment, member communication and strategies for managing and mitigating the risks associated with the Scheme,
- our insurers – they provide insurance cover for the payment of death benefits and / or provide annuity policies securing the Scheme benefits,
- our investment managers and AVC and any other money purchase providers – they invest the Scheme assets on our behalf,
- our annuity broker/retirement advice/support service,
- our auditors – they review the Scheme's annual accounts and audit them for us
- our lawyers – they advise us on all legal issues affecting the Scheme,
- our covenant advisers – they advise us on the financial support that your current or former employer may be able to provide to the Scheme,
- our indemnity insurers,
- any staff we employ and other companies that provide services to us (or to our administrators), such as communications consultants, printers, suppliers of data cleansing, verification and tracing services and information technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services,
- any financial adviser you appoint in relation to transferring your benefits to another pension scheme (and the trustees or managers of the pension schemes you transfer, or your benefits are transferred to), and
- statutory bodies (for example, the Pension Protection Fund), or government agencies in connection with contracted-out benefits (for example, HM Revenue and Customs (HMRC) and the National Insurance Contributions and Earnings Office (NICEO)).

The names and contact details of the third parties with whom we share your personal data are available on request from the Trustees using the contact details shown at the end of this notice.

We will also disclose your personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or any lawful request from any legal or regulatory authority, or
- to respond to any claims, and to establish, exercise or defend our legal rights.

As Trustees, we are a “data controller” of your personal data. This means we are responsible for keeping your personal data safe and secure.

Some of the third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. They are known as “data processors”.

We will ensure that any data processors with whom we share your personal data are subject to privacy and security obligations consistent with this privacy notice and applicable laws.

Certain third parties (most notably, the Scheme Actuary, and potentially our auditors, lawyers, insurers and other professional advisers) are themselves subject to certain legal or regulatory obligations (including professional codes of practice). They will be data controllers (and so directly responsible to you for their own processing of your personal data) to the extent that processing is subject to, or relates to, those obligations.

Accordingly, some of these data controllers have their own, separate, privacy notice which applies to their use of your personal data instead of this notice.

Do we transfer your personal data outside the UK and the EEA?

In certain circumstances, your personal data may be processed outside of the UK and the European Economic Area (“EEA”), for example, by individual Trustees who are operating or travelling outside the EEA and/or by third party service providers that may store certain personal data in a country outside the UK and the EEA.

If we (or our service providers) process personal data outside of the UK and the EEA, we will take appropriate measures to ensure that your personal data is adequately protected in a manner that is consistent with this privacy notice, and in accordance with applicable laws. Those measures include ensuring that they are based in countries that have been deemed, by the UK, to have adequate data protections and/or appropriate safeguards, in place.

Further details on the steps we take to protect your personal data in these cases are available from us on request by contacting us using the details at the end of this notice.

How long do we retain your personal data?

We keep your personal data for no longer than we need to for the purposes for which we use it as set out above.

We will need to keep your personal data for as long as you are a member of, or receiving benefits from, the Scheme. If you die, we will continue to hold your personal data to pay any benefits due to your spouse, civil partner, partner or dependants.

We will also keep your personal data for as long as necessary to answer any questions about the administration of the Scheme, deal with any complaints or claims, exercise or defend our legal rights, or comply with any legal or regulatory requirements. We will keep your personal data even if you have no spouse, civil partner or dependants, or if your spouse, civil partner or dependants die, or if you transfer out of the Scheme.

We need to keep your personal data this long because of the long-term nature of pension schemes, and the fact that questions can arise many years after someone has died or left the Scheme.

What are your rights in relation to your personal data?

You have the following rights in relation to your personal data. You can ask for more information about any of these rights by contacting the Trustees using the details shown at the end of this notice:

- **Right of access** – you have a right of access to any personal data we hold about you, including asking us for a copy of your personal data,
- **Right to update your information** – you have a right to request an update to any of your personal data that is out of date or incorrect,
- **Right to delete your information** – you have a right to ask us to delete any personal data that we are holding about you in certain specific circumstances,
- **Right to restrict use of your information** – you have a right to ask us to restrict the way we process your personal data in certain circumstances,
- **Right to data portability** – you have a right to ask us to provide your personal data to a third party provider of services in certain circumstances,
- **Right to object** – where we process your personal data on the basis of our, or another person's, legitimate interest, you have a right to ask us to consider any valid objections that you have to our use of your data,
- **Right to withdraw consent** – where we process your personal data on the basis of your explicit consent, you have the right to withdraw that consent at any time.

We will consider all requests from you to exercise your rights (including whether they apply in a particular case) and provide our response within a reasonable period. In any event we will provide a response within one month of your request, unless we tell you we are entitled to a longer period.

Please note that certain personal data may be exempt from such requests, for example if we need to keep using the information to comply with our own legal obligations. If an exception applies, we will tell you this. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

How do we keep your personal data secure?

The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction, and to take all reasonable precautions to safeguard the confidentiality of personal data.

Although we make every effort to protect the personal data that you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge that we cannot guarantee the security of personal data transmitted to us over the internet, and that any such transmission is at your own risk.

Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access to your data and take steps to ensure that any third parties with whom we share your personal data do the same.

Where we have given you (or where you have chosen) a password that enables you to access an account relating to your membership of the Scheme, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Changes to this privacy notice

We may amend this privacy policy from time to time. Any significant changes we make to our privacy policy in the future will be notified to you in the next communication from us to you, such as the regular summary funding statement or member newsletter.

Further questions or making a complaint

If you have any queries about our collection, use or other processing of your personal data, or if you wish to exercise any of your rights in relation to your personal data, please contact the Trustees using the details at the end of this notice.

If you have concerns about how your personal data is being handled in connection with the Scheme, including its accuracy, use, storage or disclosure, you have the right to raise a data protection complaint with the Trustees.

The Trustees operate a Data Protection Complaints Procedure for these matters, which reflects the specific requirements and timescales under data protection law. Details of how to raise a data protection complaint can be obtained from the Scheme administrator using the contact details provided in this notice.

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.

You also have the right to raise your concerns at any time with the Information Commissioner's Office (ICO), the UK regulatory authority responsible for data protection. Contact details for the ICO are shown below:

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

Telephone: 0303 123 1113

Online: <https://www.ico.org.uk>

Defined terms

In this privacy notice, the following terms have the following meanings:

Scheme means the Advance Tapes Group Limited Retirement Benefits Scheme.

Trustees, us, we or **our** means the Trustees of the Scheme being such individuals who act as Trustees from time to time.

Contact Details

The Trustees may be contacted as follows:

The Trustees of the Advance Tapes Group Limited Retirement Benefits Scheme
c/o Broadstone Corporate Benefits Ltd
221 West George Street
Glasgow, G2 2ND,

Tel: 0141 2851585

Email: christine.bright@broadstone.co.uk