

The JSB Electrical Staff Pension Scheme – Privacy Notice

This Privacy Notice has been issued by the Trustee of the JSB Electrical Staff Pension Scheme (the "Scheme") to comply with the Data Protection Act 2018, the UK's implementation of the General Data Protection Regulation ("GDPR"; together the "data protection laws"). This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controllers

The Trustee of the Scheme is Cooper Pensions Limited.

For the purposes of legislation implementing the data protection laws, the Trustee is "data controller" (the holders, users and processors of personal data).

The Trustee can be contacted as follows:

Name & Address	Cooper Pensions Limited c/o Barnett Waddingham LLP Port of Liverpool Building Pier Head Liverpool L3 1BW
Email	Eaton@Barnett-Waddingham.co.uk
Telephone number	0333 11 11 222

Use, transfer and storage of personal data

In the course of running the Scheme, we may require information from you to determine the benefits payable to you and your beneficiaries. This may include the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme).
- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Scheme).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

We may also require personal information in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health.

Your personal data is provided to the Trustee by your employer or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme. Your personal data will be stored until such time as we no longer need it to administer the Scheme but in any event for not longer than 15 years after the date of completion of the winding up of the Scheme up.

The Trustee shares your data with the Scheme's administrator, Barnett Waddingham LLP, as well as other professional advisers (including the pension consultants) and regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Trustee may in limited circumstances share your data with the employer for the purposes of providing information to you about access to the 'pension freedoms'.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive.

The Scheme administrator, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's legal obligation to run the Scheme in accordance with the Trust Deed and Rules. The Trustee and / or Scheme administrator may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustee's legitimate interests to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme
so that the correct benefits can be paid
- Undertake risk-management exercises
so that the risk your benefits are not paid is reduced
- Comply with the law, including regulations and guidance issued by the Pensions Regulator
so that you, the Trustee and their advisers are not subject to legal sanctions which may impact benefits
- Efficiently manage the impact of any change to the legal status of the sponsoring company
so that your benefits are not adversely affected for example by a sale or company merger

The Trustee may share your data with the providers of another pension scheme for the purposes of a transfer of your pension rights to such other scheme, where such a transfer is permitted by law. This may include the purpose of such provider analysing and correcting your data in advance of such a transfer. The legal basis for such a use of your data would be that it is in your and the Trustee's legitimate interests, where the transfer would be in your interests. Where such a transfer takes place, the provider of the receiving pension scheme may store your data for so long as may be required for the administration of that receiving scheme. Once the transfer has taken place, we would expect that the provider of the receiving scheme would be obliged to provide you with their own privacy notice relating to that provider's use of your data in respect of the receiving scheme.

The Trustee has conducted due diligence on their suppliers to ensure they process data within the UK and/or the EEA. It is possible that the directors of the Trustee and the partners / staff of adviser firms may take laptops and smartphones with them on trips outside of the UK and/or the EEA, indirectly causing data to be sent outside of the EEA.

We have received guidance that as long as the information stays with the individual on the laptop / smartphone and their employer has an effective procedure to deal with security and the other risks of using laptops (including the extra risks of international travel), it is reasonable to conclude that adequate data protection exists.

Where any of your information is transferred outside the EEA (e.g because any of the Trustee's advisers or service providers, or the sponsoring employers, have IT systems located in other jurisdictions), the Trustee will ensure that there are appropriate safeguards in place to ensure the security of personal data.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the Trustee at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the data controller with the Information Commissioner's Office ("ICO").

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform its duties in relation to the Scheme, and your benefits could be affected.

Further details about the data protection laws and your rights under data protection laws can be found on the ICO's website at <https://ico.org.uk/>, or via their telephone helpline (0303 123 1113).