

DATA PRIVACY NOTICE

Northumbrian Water Pension Scheme

WHO WE ARE

Northumbrian Water Pension Trustees Limited is the trustee (the Trustee) of the Northumbrian Water Pension Scheme (the Scheme).

As the Trustee of the Scheme, we hold certain personal information (known as personal data) about 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.

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, date of birth and gender;
- your address (and other contact details, such as your email address or telephone number, if you have given them to us);
- your national insurance number;
- your salary;
- details of your pensionable benefits, options exercised under the Scheme and service periods;
- details of your bank account (to pay benefits);
- details about your dependants and/or beneficiaries including, potentially, your marital or relationship status;
- medical and other details about your health; and
- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a pensions identifier, which is a string of characters used to identify your specific benefits under the Scheme.

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 administer the Scheme properly and to calculate, fund, secure and pay benefits. We also process and retain personal data:

- to comply with our obligations towards members under the Scheme's governing documents, as well as under relevant legislation; and
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes 'matching', where we use personal data that a user has provided to search our Scheme records to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a 'possible match'.

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 Fund, we share personal data with the following:

- your current, past or future employer;
- the Trustee's professional advisers, including the Scheme actuary, auditor, investment adviser, lawyer, other similar external advisers, service providers and actual or proposed counterparties;
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee, including the provision of payroll and member tracing services;
- the Northumbrian Water People Team;
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement;
- third parties that form part of the dashboard ecosystem that enables pensions dashboard services to work, as well as the Scheme's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem;
- insurance companies – for the purposes of any life insurance and additional voluntary contributions as well as any insurer with whom benefits may be secured;
- healthcare professionals;
- independent financial advisers;
- secure document storage facilities;
- depending upon how we pay pensions, the personal data we have to supply in order to effect a money transfer through the UK system (eg BACS or CHAPS transfer) or through any comparable system where pensions are being paid overseas;
- 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; and
- any other party to whom you have authorised your personal data to be disclosed.

Some of the entities above may also share your data with subcontractors and other third parties to assist in the provision of services to the Trustee. Sub-contracting in these circumstances would be subject to the relevant requirements of the data protection legislation.

We may also share your personal data with other companies in the Northumbrian Water group or any third parties who may be involved in any reorganisation of the Northumbrian Water business, subject to appropriate measures being taken regarding the confidentiality of your data.

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 a minimum of 6 years. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal data 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/wrong, you can ask to have it corrected.
- **Right to Restrict processing** – you can require the Trustee to restrict 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 this notice;

Please contact the Secretary to the Trustee at NWGpensions@vidett.com

MAKING A COMPLAINT

If you believe we are processing your personal data in an inconsistent way with the law, you can complain to us by contacting the Secretary to the Trustee at NWGpensions@vidett.com. If you are not satisfied with our response to your complaint, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

NOTICES FROM OTHER ENTITIES WHO CONTROL YOUR PERSONAL DATA

Some of the entities who help the Trustee run the Scheme also 'control' your personal data. This means they must provide you with a separate Data Privacy Notice telling you why and how they use your personal data.

Please see:

- the Scheme Actuary's notice at willistowerswatson.com/personal-data
- the Scheme's legal adviser's notice at sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees
- the Scheme's auditor's notice at [Privacy-Policy-Website](#)