

TSB Pension Scheme

Who we are

The Law Debenture Pension Trust Corporation P.L.C. is the trustee (“the Trustee”) of the TSB Pension Scheme (“the Scheme”).

As the Trustee of the Scheme, we hold certain personal information (known as “personal data”) about Scheme members, 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 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)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits
- medical reports and other details about your health.

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 and to calculate and pay benefits. We also keep the above 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. 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 information 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.

However, 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 which may include group companies which are based outside the EEA. Where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure
- the Scheme’s professional advisers, including the auditor, medical advisers, investment adviser and lawyers
- the scheme administrators and related third parties, who are responsible for the day-to-day administration of the Scheme, including processing contributions and paying benefits.
- 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. These may be contracted directly by the Trustee or through a third party such as the scheme administrator
- our retirement options provider, and insurance company or companies for the purposes of life insurance and for providing annuity and drawdown quotes at retirement;

- depending upon how we pay benefits from the Scheme, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) payment in the UK

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 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 or wrong, you can ask to have it corrected
- **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** – to the extent 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 sensitive 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 sensitive personal data which took place beforehand and it may be possible for the Trustee to continue processing your sensitive 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 scheme administrators, Equiniti at

Write to: **TSB Pension Scheme**
Equiniti Limited
PO BOX 4945
Lancing
BN99 8LQ

Phone: 0345 266 9214

Email: tsbpensions@equiniti.com

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

This notice is the latest version as at 1 March 2018 and is based on the information available to the Trustee at the date of drafting. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at www.tsbpensionscheme.co.uk/pensions_talk. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).