



## **PRIVACY STATEMENT**

### **THE BRITISH POLYTHENE PENSION SCHEME**

We, BPI Pension Trustees Limited, the Trustee (“**Trustee**”) of the British Polythene Pension Scheme (the “**Scheme**”), are committed to protecting personal data.

For the purpose of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 (“**GDPR**”), the Data Controller is BPI Pension Trustees Limited.

**If you have any queries related to this privacy statement please contact: Steve Bane, who is one of the directors of the Trustee, at [s.bane@rpc-group.plc.uk](mailto:s.bane@rpc-group.plc.uk)**

#### **1. ABOUT THIS DOCUMENT**

In order to administer the Scheme we will process personal data (which may be held on paper, electronically, or otherwise) about the Scheme’s members and we recognise the need to treat it in an appropriate and lawful manner, in accordance with GDPR. The purpose of this notice is to make you aware of how we will handle your personal data.

This notice may be amended at any time. Any amendments will be notified to you through our annual newsletter or in writing from time to time.

“**Personal data**” means information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. “**Processing**” means doing anything with the data, such as accessing, storing, disclosing, transferring, destroying or using the data in any way.

#### **2. HOW WE USE YOUR PERSONAL DATA**

**We process the following types of personal data:**

- personal details such as your name, gender, age, date of birth, contact details (e.g. your address and postcode, email, telephone and mobile numbers), and identifiers such as your National Insurance number, pension or member reference number and employee number (where applicable);
- details of your family, lifestyle and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants;
- financial details such as that about income, other pension arrangements, bank account details (e.g. to process pension payments) and tax code;
- employment details such as your earnings, length of service, employment and career history, recruitment and termination details, absence record, job title and job responsibilities.

**We may process sensitive personal data relating to you including, as appropriate:**

- information about your physical or mental health or condition (where there is a legal basis for the processing of such data under applicable law).

### **We will process data about:**

- members and beneficiaries;
- service providers and advisers;
- trustees; and
- employers.

### **We process the above personal data:**

- for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example: to calculate and pay benefits. This includes providing you with details of your benefits and options under the Scheme and dealing with any queries that you have about these;
- to carry out our obligations arising from any agreement that we have with, or concerning, you to provide you with the information, benefits and services that you request from us;
- to notify you about services provided to members of the Scheme and any changes to those services or to enable you to access those services;
- for statistical, financial modelling, accounting and reference purposes;
- for internal record keeping;
- for risk management purposes, including the insurance or management of longevity risks and related demographic risks or of the Scheme's benefits;
- complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by any relevant regulators, government departments and law enforcement or tax authorities or in connection with any disputes or litigation;
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of business relating to the sponsoring employer or its associated companies.

### **3. FAIR, LAWFUL AND TRANSPARENT PROCESSING**

We will only process your personal data for the specific purpose or purposes notified to you, purposes which are compatible with those original purposes or for any other purposes specifically permitted by GDPR. As a "data controller", we must process this information fairly and lawfully.

We need to hold and process information about you for us to administer the Scheme, and to calculate and pay benefits. Under the legislation, this means that we have a legitimate interest in processing the information. We will not collect any personal data from you that we do not need.

We may also need to hold and process some sensitive information about you and/or your dependants and beneficiaries. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. We will only collect any sensitive personal data from you when it is needed, for example, information about your health if you apply to receive your benefits on the grounds of ill health.

### **4. DATA RETENTION**

We will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required.

## 5. DATA SECURITY

We will ensure that appropriate measures are taken against unlawful or unauthorised Processing of personal data, and against the accidental loss of, or damage to, personal data. We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if that third party agrees to comply with those procedures and policies, or if they put in place adequate measures themselves. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

## 6. PROVIDING INFORMATION TO THIRD PARTIES/DATA SHARING

We sometimes need to share the personal information we process with other organisations. Where this is necessary, we are required to comply with all aspects of GDPR.

### We share information with:

- the Scheme administrator, which is currently Hymans Robertson LLP (“**Scheme Administrator**”);
- the Scheme Administrator, acts as a data processor and processes member data in order to provide the administration services to the Scheme, on behalf of the Trustee;
- the Scheme Administrator also provides actuarial and consultancy advice to the Trustee of the Scheme, including through the Scheme Actuary (currently Calum Cooper, an employee of the Scheme Administrator). When providing actuarial services, the Scheme Actuary and Scheme Administrator act as a data controller jointly with the Trustee. You may obtain further information on their role and use of data at: [https://www.hymans.co.uk/media/uploads/How\\_Hymans\\_Robertson\\_uses\\_your\\_personal\\_data.pdf](https://www.hymans.co.uk/media/uploads/How_Hymans_Robertson_uses_your_personal_data.pdf)
- the Scheme’s other professional advisers and auditors, including the Scheme’s legal advisers Brodies LLP, investment advisers Aon Hewitt and auditors KPMG. These organisations use the information when advising the Trustee and carrying out their respective professional obligations;
- the Scheme’s insurers (and other insurers for the purpose of obtaining quotations relating to the Scheme or its benefits), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the Trustee or sponsoring employer to advise you about your options under the Scheme or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Scheme;
- any other person who is authorised to act on your behalf;
- companies within the sponsoring employer’s group and their professional advisers;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant ombudsman, dispute resolution body or the courts;
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in business relating to the sponsoring employers or its associated companies;
- pension schemes with which the person whose data we are Processing has an association;
- healthcare, social and welfare organisations; and
- current, past or prospective employers.

## 7. INTERNATIONAL

We do not hold data internationally. However, it may sometimes be necessary to transfer personal information overseas. When this is needed information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of GDPR.

## 8. YOUR RIGHTS

**Access to your information** – You have the right to request a copy of the personal information about you that we hold.

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below
- You have validly objected to our use of your personal information – see *Objecting to how we may use your information* below
- Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – You can object to your personal data being processed, although we can override this objection in certain circumstances.

**Restricting how we may use your information** – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply if we no longer have a basis for using your personal information but you don't want us to delete the data.

**Withdrawing consent using your information** – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

**You should be aware that taking any of the above steps could impact on the payment of your benefits and our ability to answer questions relating to your benefits.**

## 9. COMPLAINTS

The Trustee seeks to resolve directly all complaints about how it handles personal information. If you would like to raise a complaint in relation to how we process your personal data in relation to the Scheme please contact: Steve Bane, director of the Trustee of the Scheme at: [s.bane@rpc-group.plc.uk](mailto:s.bane@rpc-group.plc.uk)

You also have the right to lodge a complaint with the Information Commissioner's Office whose contact details are as follows:

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

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Website: <https://ico.org.uk/concerns>