

Smith Anderson & Co Limited 1973 Staff Retirement Benefit Scheme (the 'Scheme')

PRIVACY NOTICE – APRIL 2022

Purpose of this Privacy Notice

Please read this Privacy Notice carefully as it contains important information about who we are, what personal data (information) we hold about you, how and why we collect, store and use it, how we may share this information and your rights in relation to your personal data.

Whilst this notice is important, you do not need to take any action in respect of it.

Our role as a data controller

Dalriada Trustees Limited are the Trustee of the Scheme and are a “data controller” of the personal data collected and used by the Scheme. This means we are responsible for deciding what personal data about you is required to carry out our duties as Trustee and how it should be protected.

In addition, the Scheme Actuary (currently, James Jordan FIA) and our Actuarial Advisers (Barnett Wadingham) act as a joint data controller in respect of the personal data that they use. This Privacy Notice also covers these joint data controllers.

What personal data do we hold and use?

We hold personal data about you to enable us to calculate and pay benefits to you or your dependants. The information will also be used, where necessary, for the financial management of the Scheme.

As Trustee of the Scheme we may hold the following data about you:

- personal details such as your name, date of birth, gender, contact details (i.e. address, home and mobile phone numbers, email address) and national insurance number;
- employment details such as your employment history (including any breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records;
- details about your family and personal circumstances, such as your marital status, details of your spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries; and
- financial details such as your bank account and tax information.

We may also hold 'special categories' of personal data (i.e. sensitive information which comes with additional safeguards under data protection legislation). This may include information about your health, including any medical conditions (for example, if you apply for ill-health early retirement).

How we collect this information

The personal data we hold about you may be given to us by:

- **Your employer**, for example, salary information, part-time working details, and information on when you joined and left employment.
- **You**, for example, through the forms which you completed when you joined the Scheme. You (or your family members) may also have provided information subsequently when you contacted the Scheme to discuss your benefits, to tell us about a change of address or for other reasons.
- **Another pension scheme**, where you transferred your benefits into the Scheme. This will include information such as your dates of service, contracted-out benefits (if applicable) and contributions.
- **Your doctor**, where we have used this person to obtain medical information if you have applied for ill-health retirement.
- **Government agencies** to share information to administer and pay benefits, for example tax codes, national insurance history, contracted-out benefits.
- **Service providers** who help us trace members with whom we have lost contact.

How we use your personal information

We will typically use this information for the following purposes:

- to contact you;
- to respond to individual queries, complaints and disputes;
- to calculate, provide and assess eligibility for Scheme benefits;
- to comply with obligations arising from administering the Scheme;
- to determine and implement alternative ways of providing Scheme benefits (e.g. by way of a lump sum and/or pension, transfer to another scheme, the purchase of an insurance policy, a merger with another pension scheme);
- to determine and manage Scheme investments and risks
- to determine and manage Scheme liabilities and funding requirements;
- in connection with any corporate activity a Scheme employer may be engaged in.

Why do we hold this information?

We hold this information because we have a legitimate interest in ensuring that you and/or your dependants get the benefits you are entitled to receive, to ensure that the Scheme is well run and to be confident that the Scheme has sufficient funds to pay the benefits promised.

We may also use it to comply with our legal obligations, for example to keep and maintain records about you, to fulfil our obligations to HMRC and in calculating whether the Scheme has enough money to pay future benefits.

We may also hold and use more sensitive data (also known as “special categories of data”), such as health information collected when considering whether to pay any ill-health benefits. We may need this sensitive data if it is necessary for us to pay ill-health benefits to you, or death benefits to the people you have nominated. If we use this data it will be in accordance with legal data protection requirements and/or because you consent, at the time, to us holding and using this information. You may withdraw that consent at any time, in which case we will erase that sensitive data. However, if we consider that doing this will prevent us from paying the correct benefits to you or your dependants, we will let you know before proceeding.

The Scheme Actuary and Barnett Waddingham also hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing actuarial advice and valuations to us. For example, the Scheme Actuary carries out calculations to advise us if the Scheme has enough money to pay the future benefits promised to its members.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to the information we collect or to the purposes for which we collect and process it.

Who do we share information with?

To run the Scheme, your personal data will be used by the Scheme Administrator (Dalriada Trustees Limited) and our advisers, as appropriate (including the Scheme Actuary (currently, James Jordan), actuarial advisers (currently, Barnett Waddingham), auditor (currently, Cooper Parry) and legal advisers (currently, Brodies LLP).

We may also need to share your personal data with external consultants and service providers who perform tasks for us on our behalf to assist in running the Scheme or to other parties where we believe it is in the legitimate interests of the Scheme (this may include annuity providers, firms providing death-in-service insurance services for the Scheme and tracing agencies. Where we do share information with these parties we remain in control of the data and we will ensure that suitable data protection agreements are in place.

We may transfer your data to separate third parties. These parties may include:

- official organisations who we have a legal obligation to provide information to. This includes HMRC and The Pensions Regulator
- insurance companies, for example, if we buy an annuity on your behalf
- other pension schemes, if you ask us to transfer your benefits to a new scheme

- the Employer, or their advisers, to enable them to manage their financial commitment to the Scheme, to produce pension related accounting disclosures, for member option exercises and to allow them to answer questions you may have about your benefits or to give you guidance on pension related matters.

Where possible we will anonymise your data before it is shared with third parties.

How long do we keep your data?

We will keep information about you for the lifetime of the Scheme. Should we change the administrators or advisers who help us to run the Scheme, we will ensure the previous providers pass your personal data onto the new ones and erase any other copies of your personal information after a suitable period.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Transfer of data outside of the UK

In certain circumstances, your personal data may be processed outside of the UK.

If we (or our service providers) process personal data outside of the UK, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice and in accordance with safeguards required by applicable laws.

Your rights

You may ask for a copy of the information we hold about you. You may make this request by contacting us. If, at any point, you believe the information we hold about you is wrong, you can ask us to correct it.

In some circumstances, you may also have a right to ask us to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

If you wish to raise a complaint on how we handle your personal data, you can contact us, to have the matter investigated. If you are not satisfied with our response or believe the way we are processing your personal data is not in accordance with the law you can complain to the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Contacting us

It is important that the information we hold about you is accurate and up to date. Please keep us informed if your personal information changes so that we can continue to pay you benefits when due, and contact you about your membership of the Scheme. In particular, please let us know if you move home, so that we can stay in touch with you.

You may contact us for further details on how we use your personal data, or with any other questions about this privacy notice (including any requests to exercise your rights). Our address is:

Dalriada Trustees Limited
Smith Anderson & Co Limited 1973 Staff
Retirement Benefits Scheme,
Linen Loft 27-37 Adelaide Street,
Belfast
BT2 8FE

Changes to this Privacy Notice

We keep our Privacy Notice under review and will notify you of any changes.

Dalriada Trustees Limited, Trustee of the Smith Anderson & Co Limited 1973 Staff Retirement Benefits Scheme

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dalriadatrustees.co.uk

Signatory of:

 PRI Principles for Responsible Investment	 Accredited Member Pensions Administration Standards Association	 PMI EXPERT PARTNER	 PENSIONS Age AWARDS 2020 WINNER INDEPENDENT TRUSTEE FUND OF THE YEAR	 corporate solvency WINNER BEST RETIREMENT TRUSTEE	 PENSIONS UK PENSIONS AWARDS 2020 FINALIST	 PROFESSIONAL PENSIONS UK PENSIONS AWARDS 2019 FINALIST	 ISAE 3000 Trust Services	 BSI BSI Certification Registered	 FIRM ESSENTIALS
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