

PRIVACY NOTICE

for the NUFFIELD HEALTH PENSION AND LIFE ASSURANCE SCHEME

This notice is for members and beneficiaries of the Nuffield Health Pension and Life Assurance Scheme (the “**Scheme**”). It has been prepared by Nuffield Health Pension Trustees Limited (the “**Trustee**”, or “**we**”) in its capacity as the trustee of the Scheme.

Why we are providing this notice to you

As the Trustee of the Scheme we hold certain information about you (“personal data”) which we need to administer the Scheme and pay benefits from it. We are required by law to give you certain information about the data we hold about you, how we use it, and what safeguards are in place to ensure it is protected. This notice is designed to give you that information

The technical bit

The Trustee holds personal data about you in its capacity as data controller for the proper administration of the Scheme. This includes the need to process your data to contact you, to calculate and pay your benefits, for statistical and financial modelling and for reference purposes and to administer the Scheme generally. Further information about how we use your personal data is provided below.

The legal basis for our use of your personal data will generally be that we need to process your personal data:

- a) to satisfy our legal obligations as Trustee of the Scheme;
- b) for the legitimate interests of administering the Scheme and calculating and paying benefits from the Scheme and to perform our obligations and exercise any rights and discretions the Trustee has in relation to the Scheme; and/or
- c) because we need to process your data to meet our contractual obligations in relation to the Scheme, or to take steps, at your request, before entering into a contract.

What personal data we hold and how we obtain it

The types of data that we hold and process about you include:

- Contact details, including name, address, telephone number and email address.
- Identifying details, including date of birth and national insurance number and employee membership number.

- Information that is used to calculate and assess eligibility for benefits, for example length of service and salary information.
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax details.
- Information about your family, dependents or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death.
- Information about your health.

We obtain some of this personal data directly from you. We may also obtain data from your employer (for example salary information – where you are a beneficiary of the Scheme this will be obtained as a consequence of the corresponding member's membership of the Scheme) and from a variety of other sources including public databases, our advisers and government or regulatory bodies.

How we will use your personal data

We will use this data to administer the Scheme. This will include the processing of your personal data for all or any of the following purposes:

- to contact you;
- to assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits;
- for statistical and financial modelling and reference purposes;
- to comply with our legal and regulatory obligations as the Trustee of the Scheme; and / or
- to address queries from you and other beneficiaries and to respond to any actual or potential disputes concerning the Scheme.

Organisations that we may share your personal data with

From time to time we will share your personal data with advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Scheme. These currently include the Scheme's:

- Administrators – Nuffield Health and Punter Southall
- Legal advisers – Squire Patton Boggs
- Scheme actuary – Adam Stanley, Punter Southall
- Actuarial consultants – Punter Southall
- Investment advisers – PSolve
- Mortality screening provider – Capita
- Payroll provider – Nuffield Health
- Statutory auditors – Grant Thornton

- Additional voluntary contribution providers – Standard Life and Clerical Medical

In addition, where we make Scheme investments or seek to provide benefits for Scheme members in other ways, such as through the use of insurance or pension scheme mergers, then we may need to share personal data with providers of investments, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

The organisations referred to in the paragraphs above may use the data to perform their functions in relation to the Scheme as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates), business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass data to other insurance companies for the purposes of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

We may also provide some of your data to the Scheme's principal employer, Nuffield Health, and its relevant subsidiaries, to help them make decisions. We will only do this to the extent that we consider the information is reasonably required for these purposes

Where requested or if we consider that it is reasonably required, we may also provide your data to government and law enforcement organisations – including the Pensions Regulator, the Pension Protection Fund, Her Majesty's Revenue and Customs and the Courts of England and Wales (for the purpose of processing pension sharing orders on divorce). They may then use the data to carry out their legal functions.

In some cases these recipients may be outside the UK. This means your personal data may be sent outside the EEA to a jurisdiction that may not offer an equivalent level of protection as is required by EEA countries. If this occurs, we are obliged to verify that appropriate safeguards are implemented with a view to protecting your data in accordance with applicable laws. Please use the contact details below if you would like further information about the safeguards that are currently in place.

We do not carry out any automated processing for marketing purposes using your personal data and will not share this data with anyone for the purpose of marketing to you or any beneficiary.

How long we keep your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected and for so long afterwards as we consider we may be required to deal with any questions or complaints that we may receive about our administration of the Scheme, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations.

Your rights

You have a right to access and obtain a copy of the personal data that the Trustee holds about you and to ask the Trustee to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask the Trustee 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 website at www.ico.org.uk or via the telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Scheme Secretary using the details given below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustee's processing activities with the Information Commissioner's Office which you can do through the website above or their telephone helpline.

The personal data we hold about you is used to administer your Scheme benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the payment of benefits payable to you (or your beneficiaries) under the Scheme. In some cases it could mean the Trustee is unable to put your pension into payment or has to stop your pension (if already in payment).

Updates

We may update this notice periodically. Where we do this we will inform you of the changes and the date on which the changes take effect.

Contacting us

Please contact the Scheme Secretary at the address below for further information:

Scheme Secretary
Nuffield Health
Epsom Gateway
Ashley Avenue
Epsom
Surrey
KT18 5AL