University of Newcastle upon Tyne Retirement Benefits Plan (1971) for non-academic Staff ("the Plan") - Privacy Notice

This Privacy Notice describes how the Trustee of the Plan holds and uses personal information about members and other beneficiaries of the Plan.

Data controller: Newcastle University Pension Trustee (1971) Limited ("the Trustee"), Newcastle University, King's Gate, Newcastle upon Tyne, NE1

The Trustee collects and processes personal data relating to member information as outlined below.

What information does the Trustee collect?

The Trustee collects and processes a range of information about you and your dependants. This includes:

1. **Basic Personal Data**: including name, address, postcode, contact details;
2. **Unique Identifiers**: such as National Insurance Number or pension scheme reference number.
3. **Demographic Information**: Date of birth, age, gender, marital status
4. **Employment Information**: Role, employment status (such as full/part-time, contract, department and employment history).
5. **Financial Information**: Salary, tax code, third party deductions e.g. AVCs, benefit and entitlement data including where required spouse/dependants' financial details.
6. **Benefits information**: benefit elections, pension entitlement information, date of retirement and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
7. **Special categories such as medical information**: in some cases it may be necessary for us to collect and process more sensitive personal information, for example relating to ill-health early retirement and ill-health reviews (to determine the benefits payable to you). This kind of personal information is not routinely collected and processed by the Trustee, and this will only be done where it is necessary to do so in the circumstances.

We collect this information from pension scheme members/dependants directly through scheme communications and forms. We also collect some information from third parties, such as your employer, HM Revenue & Customs, or (if the Trustee does not have up-to-date contact details and is trying to locate you) from a tracing agent.

Data is stored in a range of different places, including by AON, in your personnel file, in Newcastle University's payroll management systems and in other IT systems (including Newcastle University's email system).

Why does the Trustee process personal data?

The Trustee needs to process data to be able to operate the Plan and administer your benefits in it, and comply with the legal obligations the Trustee is subject to under the trust deed and rules governing the Plan and/or overriding legislation.

In some circumstances the Trustee may also have legitimate interests in processing your data, for example in sending you information relating to pension scams and options relating to your benefits in the Plan.

Who has access to data?

Your information will be shared internally with Newcastle University's payroll department, to enable the appropriate application of Plan benefits.
The Trustee shares your data with AON who administer the Plan on the Trustee's behalf.

The Trustee may also need to share your data with other appointed third party providers (such as the actuary, auditor and other professional advisers), Newcastle University (as the Plan's principal employer), tracing agents and insurance companies, to arrange particular entitlements, for instance life insurance or an annuity policy where relevant. Please find enclosed Aon’s Privacy Notice.

The Trustee will not ordinarily transfer your data to countries outside the European Economic Area, although this may be necessary if you live or work abroad and we need to contact you. The Trustees appointed third party providers may transfer your data to countries outside the European Economic Area. Where this is the case, the third part providers will ensure the appropriate security measures and controls are in place to protect your personal information, as well as your rights in relation to that personal information. Aon’s Privacy Notice includes further detail.

**How does the Plan protect data?**

The Trustee takes the security of your data seriously. We have implemented appropriate technical and organisational security measures to protect the personal information we collect against unauthorised or unlawful processing and against accidental loss, damage or destruction.

Where the Trustee engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

**For how long does the Trustee keep data?**

The Trustee will retain your data whilst benefits are due and payable to you or your dependants from the Plan.

The Trustee will also normally continue to store your data after the benefits payable to you or your dependants have been paid in full, or you transfer out of the Plan, to enable the Trustee to comply with its legal obligations and in order to be able to answer queries about how your benefits were dealt with (which could be made many years later). Any processing of your data once you have transferred out of the Plan or all your benefits have been paid in full will only take place where strictly necessary.

**Your rights and choices**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- ask the Trustee to change incorrect or incomplete data;
- object to the processing of your data where the Trustee is relying on its legitimate interests as the legal ground for processing; and
- ask the Trustee to delete or stop processing data in certain circumstances.

It is important to inform the Trustee of any changes in your personal details to ensure the information held is accurate and kept up to date. If you need to do this, wish to know more about the information held by the Trustee or the purposes for which it is held, or would like to exercise any of the above rights, please email pensions-enquiries@ncl.ac.uk.

If you have a complaint about the Trustee's management of your data, or believe that the Trustee has not complied with your data protection rights, you can complain to the Information Commissioner’s Office, which can be contacted on 0303 123 1113 or via other methods of communication as explained on their website (currently https://ico.org.uk).