

PRIVACY NOTICE

ROYAL NATIONAL INSTITUTE FOR DEAF PEOPLE PENSION AND LIFE ASSURANCE SCHEME (the "SCHEME")

This Privacy Notice, which is a requirement of legislation (the General Data Protection Regulations ("GDPR") and then the Data Protection Act 2018), explains how we, the Trustee (Capital Cranfield Pension Trustees Limited with effect from 11 August 2022) of your Scheme, as data controllers, use the data we collect about you. The Trustee of the Scheme do not have an appointed Data Protection Officer.

PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING

As Trustee, our fundamental responsibility is to administer the Scheme for the benefit of the members and any other beneficiaries. Types of personal data that we collect and use for this purpose include: Name, date of birth, gender, marital status, contact details; employment history including salary information; National Insurance details, HMRC Tax Code; bank/savings account details; and health information.

The data that we collect in relation to you will be used to allow you to:

- i) join the Scheme (details of your name and date of birth and your initial salary would all be required) and to ensure the efficient and regulatory compliant running of the Scheme; and
- ii) remain a member of the Scheme (whether that is as an active member, as a deferred member who has left employment with the employer that sponsors the Scheme or as a pensioner),

and to allow us to:

- i) communicate with you about your benefits and the Scheme;
- ii) respond to requests for information or queries on your benefits; and
- iii) assess your entitlements and to pay to you and/or your beneficiaries, benefits (pension and lump sum) from the Scheme.

We do not use your personal data for any statistical analysis in order to facilitate the sale of any services or goods to you.

We are required to advise you if automated decisions, i.e. decisions that do not involve consideration by other individuals, occur in relation to your data. We can confirm that there are no automated decisions that have significant consequences in relation to you as the data subject being undertaken in respect of the data that we hold as data controllers or by any of the data processors with whom we share data.

The lawful bases on which we hold and use your data are that this is necessary for the purposes of legitimate interests pursued by the Trustee and that this is necessary for the purpose of complying with legal obligations to which the Trustee are subject.

For these purposes legitimate interest means our interests as Trustee in running the Scheme as effectively, efficiently and securely as possible. We also have legal obligations to run the Scheme in keeping with legal requirements, which include but are not limited to trust law, pensions legislation, tax law and regulatory guidance.

As Trustee we also have duties and powers, some of which are conferred by law and some by the governing documentation of the Scheme. Utilisation of data in order to ensure we comply

with these duties and powers is also a part of our legitimate interests and legal obligation compliance requirement.

All the processing we do of personal data is designed to ensure that all members receive their appropriate entitlement to a pension and other benefits.

We do not consider that these legitimate interests and the legal obligation compliance requirement would cause harm or hurt to any individual in respect of whom we hold data.

Any sensitive data (information on ethnicity, religious belief, trade union membership, sexual orientation or health etc.) we only hold having gained your express consent relating to the data and the reason we intend to hold that data.

DO WE SHARE YOUR DATA?

At present we may share your personal data with:-

- your current or former employer in relation to the Scheme;
- the administrators of the Scheme to whom we as Trustee have delegated some of the day to day and ongoing activities essential to the running of the Scheme;
- a professional actuary appointed as the Scheme Actuary to the Scheme so that they can carry out the necessary calculations in order to assess the benefits and to assist us with agreeing payments to the Scheme to fund the benefits. Aon, as the current Scheme Actuary, is also a data controller. Their privacy notice is set out in the Appendix;
- insurers who provide the Trustee with insurance to cover payment of benefits on or from which we purchase policies to provide pension benefits when a members come to retire (an annuity);
- investment managers who advise the Trustee on the investment of the Scheme assets;
- scheme auditors, as all schemes are required to have professional auditors appointed, who review and provide input into the Scheme's annual accounts;
- legal advisors who advise the Trustee on compliance with legislation and other legal issues to ensure the legal and effective running of the Scheme on your behalf. Gunnercooke, as the current legal advisors to the Scheme, are also a data controller. Their privacy policy can be accessed via their website: <https://gunnercooke.com/privacy-policy/>;
- HMRC, regulatory authorities, the Pensions Regulator and any third parties with whom the Trustee are authorised or required by law to share personal information; and
- financial advisers as authorised by Scheme members or their beneficiaries.

On specific occasions we may also share your data with:

- appointed covenant advisors who are specialists with knowledge and expertise in assessing the financial strength of the company/organisation supporting the Scheme;
- benefit consultants who provide advice to us about the design of the Scheme; and
- other third parties who provide one off services such as tracing services where we are unable to locate an individual who we believe has an entitlement under the Scheme, organisations that

provide secure data storage or destruction and IT specialists who advise on disaster recovery and cyber security.

We are in the process of reviewing contracts with all third parties with whom we share your data to assess and ensure their contractual commitment to compliance with the GDPR.

DATA RETENTION

As long as you remain a member of the Scheme with an entitlement to a benefit either for yourself, or your beneficiaries or your estate, we will retain the information necessary to allow us to fulfil our legitimate interests and manage and eventually pay that benefit entitlement.

The Trustee have a data retention policy which sets out the full details in relation to all the data that is held.

YOUR RIGHTS

As an individual on whom we hold personal data you have rights in relation to that data and this Privacy Notice informs and confirms to you those rights. You have as a data subject the right:-

- to have access to your personal data by writing to the Trustee at the address at the end of this notice, and you have the right, where provided by the GDPR, to have your data transferred to you or to another Data Controller in a structured, commonly used and machine-readable format;
- to have your personal data amended if it is inaccurate or is not complete;
- to have your data deleted if there is no legitimate reason for its continued storage or processing;
- to object to your data being processed and to restrict the processing of your data in certain circumstances; and
- to make a complaint about the processing of your data, and the Trustee as data controllers, to the Information Commissions Office, contact details for which are at the end of this Notice.

If you have given your consent to the use of your personal data (including sensitive data), you can withdraw that consent at any time.

Please be aware that on exercising your rights, particularly your right to withdraw consent, to have personal data deleted and your right to object to or restrict processing of your personal data, the Trustee may then not be able to fulfil their obligations to you in relation to the Scheme in pursuant of their legitimate interests and your entitlement to benefits may be affected. It may also be the case that the Trustee are able to confirm circumstances in which your right will not be enforced, where it is legally acceptable to do so, and if so they will confirm the reasons for that decision.

TRANSFERS OF PERSONAL DATA TO OTHER COUNTRIES

The Trustee provide information to third parties who either advise us or who provide services in relation to the Scheme. Some of those parties may transfer data outside the European Union (EU) and the European Economic Area (EEA). Where data is transferred outside either the EU or the EEA, you can expect a similar degree of protection in respect of your personal information. The Trustee will take steps (and require providers who consider themselves to be data controllers to do the same) to ensure that,

where data is transferred outside the EU/ EEA, the countries to which your data is transferred are deemed to provide an adequate level of protection for your personal information.

CONTACTS

The main contacts for the Trustee, if you have any questions or wish to exercise any of your rights listed above, is The Secretary to the Trustee who can be contacted at :-

Royal National Institute for Deaf People Pension & Life Assurance Scheme
c/o Aon
Parkside House
Ashley Road
Epsom
Surrey KT18 5BS

The Information Commissioner's Office (ICO) can be contacted at:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113

www.ico.org.uk

APPENDIX

Aon Solutions UK Limited “QUICK READ” PRIVACY NOTICE

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <https://aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting contact us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

August 2022