

Pianoforte Supplies Pension Plan

Personal information and what the Trustee does with it

The Trustee of the Pianoforte Supplies Pension Plan (the “**Scheme**”) needs personal information about you to run the Scheme and pay benefits. Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustee about how your personal information will be used for those purposes. These other parties (our ‘**Trustee Advisers**’) include:

- the Scheme Actuary (currently Rob Hammond of First Actuarial); and
- First Actuarial (when providing defined benefit actuarial consulting services).

In legal terms, the Trustee and the Trustee Advisers are ‘joint data controllers’ in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what the Trustee does with your personal information, and also what the Trustee Advisers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, ‘we’ means both the Trustee and the Trustee Advisers where they are acting as joint data controllers in relation to your personal information (as described above).

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, sex, date of birth, national insurance number and bank account information (where benefits are in payment).
- Contact details (including your address, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information (including sex and date of birth of your spouse or civil partner) we might need to pay any benefits due on your death.
- Whether you have any dependants and other information (including sex and/or date of birth of your dependant) we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. The Trustee might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

Where the Trustee gets personal information from

Some of the information the Trustee has comes directly from you. In addition, First Actuarial, who administers the Scheme on behalf of the Trustee, may have obtained information from you and passed it to the Trustee. The Trustee may then in turn pass information about you to the Trustee Advisers or may instruct the administrator to do so. The Trustee is the source of the personal information which the Trustee Advisers have about you.

Sometimes the Trustee (and/or the Scheme administrators) gets information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if the Trustee has lost touch with you and are trying to find you. In addition, information may be obtained from electronic sources for example, electronic address tracing and mortality screening services. The Trustee may in turn pass this to the Trustee Advisers (as above).

If the Trustee asks you for other information in the future (for example, about your health), it will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Why the Trustee holds personal information and how it shares it

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

The Trustee will use your personal information to comply with these legal obligations, to establish and defend their legal rights, and to prevent and detect crimes such as fraud. The Trustee may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

The Trustee also has a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; managing existing insurance contracts; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

In order to achieve this, the Trustee may share your personal information with various people, including: any new trustees; the Scheme employers; the Scheme administrator; the Trustee Advisers; the Trustee's other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; and IT and data storage providers and other service providers. If your benefits are transferred to another scheme, the Trustee will also need to provide the administrators of that scheme with information about you.

The Trustee may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustee may share your personal information with service providers (such as independent financial advisers) so that they can contact you for that purpose.

Sometimes we will need to use our special categories of personal data in order to establish, exercise or defend legal claims. When the Trustee needs to use information about your health (or other very personal information), it may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustee to use this information without consent, and it will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting the Trustee using the contact details given below. This may affect what the Trustee can do for you, unless it has another lawful reason for using your information. For example, if you withdraw your consent after you have provided medical information to us as part of an early retirement application, this will not affect the processing we have already done with the personal information you have provided, but it may prevent us from considering your application further.

The Trustee may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustee may share your personal information with the employers and their advisers (which may include independent financial advisers) so that they can contact you for that purpose.

Scheme Actuary and actuarial advisers

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and, together with First Actuarial, carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. They may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

How to contact the other people the Trustee gives your personal information to

Some of the people mentioned above just use your personal information in the way the Trustee tells them. However, others (including the Trustee Advisers) may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from any of the people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustee and it will put you in touch with them.

How long the Trustee keeps your personal information for

The Trustee needs to keep some of your personal information long enough to make sure that it can satisfy its legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

The Trustee will keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the personal information that we hold will be kept for a period of up to 75 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you or 75 years from when you transfer out to another scheme or provider.

The Scheme Actuary and actuarial advisers keep a copy of information. Should the Scheme Actuary or actuarial advisers change, First Actuarial will retain a copy of the data in line with their data retention policy, which is currently for a minimum of one year and a maximum of seven years.

Your rights in relation to your personal information

You have rights in relation to the personal information the Trustee has about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how the Trustee process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and the Trustee will explain these to you where they are relevant.

To exercise these rights, please use the Trustee's Scheme administrator's contact details, which are set out below. The Trustee's Scheme administrator can also supply more information about these rights to you, on request.

The Trustee will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise your rights, you should contact the Trustee using the details below.

Keeping your information safe

When the Trustee passes your information to a third party, it seeks to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people the Trustee shares your information with may process it overseas. This means that your personal information may on occasion be transferred from the UK to countries or territories which do not have adequate protections for personal data within their own laws. Some countries already provide adequate legal protection for your personal information, for instance countries which are in the European Union or wider European Economic Area, but in other countries, additional steps will need to be taken to protect it. If you live overseas we will be able to send your own personal information to you based on your consent.

You can contact the Trustee for more information about the safeguards it uses to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what the Trustee does with your information and what your rights are, please contact the Trustee via the Scheme administrator at:

First Actuarial LLP, Trafford House, Chester Road, Manchester, M32 0RS
manchester.admin@firstactuarial.co.uk

If you have concerns about the way the Trustee handles your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.