

Flour Milling and Baking Research Association Pension and Assurance Scheme Privacy Notice – November 2020

Purpose of this notice

This privacy notice aims to give you information on how the personal data regarding your membership of the Scheme is collected and processed.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data.

We may update this privacy notice from time to time. We will provide you with a new privacy notice when we make any substantial updates.

Whilst this notice is important, you do not need to take any action in respect of it. The notice is for your information only.

Data Controller

Dalriada Trustees Limited are the current Trustee of the Flour Milling and Baking Research Association Pension and Assurance Scheme (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 of the Scheme and how it should be protected.

In addition, the Scheme Actuary (currently, Sam Mullock FIA) and our Actuarial Advisers (First Actuarial) act as a joint data controller for 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.

The information we hold about you includes:

- details of your employment history, including salary information
- personal information including name, maiden name, date of birth, National Insurance number and contact details
- records of any benefits you have transferred into the Scheme from other pension arrangements
- records of any additional contributions you or the employer, on your behalf, have paid into the Scheme
- information on benefits you will receive from the Scheme
- your bank account details (but only from the time we need to start paying benefits to you).

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 First Actuarial 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 for 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.

Where did we get information about you?

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

- **The employer**, who provided us with data such as your 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.
- **Previous pension schemes**, 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 member benefits, for example tax codes, national insurance history, contracted-out benefits.

Who do we share information with?

To run the Scheme, your personal data will be used by the Scheme Administrator (currently First Actuarial) and our advisers, as necessary (including the Scheme Actuary (currently, Sam Mullock), actuarial advisers (currently, First Actuarial), auditor (currently, MHA Monahans) and legal advisers (currently, Osborne Clarke). 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; for example, if you move to a new house and don't tell us your new address). 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 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.

We only share information about you where it is necessary for the running of the Scheme. We do not share information about you for any other reason.

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.

The Scheme Actuary and the actuarial advisers also keep a copy of the information. Should we change our Scheme Actuary or actuarial advisers, the existing provider will keep a copy of the data for a minimum of one year and a maximum of seven years.

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's Office.

Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Scheme 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.

Contacting us

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) via the Scheme Administrator, First Actuarial or the Trustee using the contact details below (our preferred method is via email):

Flour Milling and Baking Research
Association Pension and Assurance
Scheme
c/o First Actuarial LLP
Trafford House
Chester Road
Manchester
M32 0RS

Email: fmbra.pensions@firstactuarial.co.uk

Dalriada Trustee Limited Trustee of Flour
Milling and Baking Research Association
Pension and Assurance Scheme
46 New Broad Street
London
EC2M 1JH

Email: FMBRA@dalriadatrustees.co.uk

**Issued by Dalriada Trustees Limited the Trustee of the Flour Milling and Baking
Research Association Pension and Assurance Scheme**