

## **TRUSTEE OF THE HOWDEN JOINERY PENSION PLAN**

### **PRIVACY NOTICE**

#### **INTRODUCTION**

The Howden Joinery Pension Plan Trustee takes your privacy and data security seriously and will only gather, use and hold information about you that is needed to administer and manage your pension and other benefits under the Plan ("Plan benefits"). We will not share your data with any third parties for the purpose of direct marketing.

This Data Privacy Notice applies to all current and former members and other current, former and prospective beneficiaries of the Howden Joinery Pension Plan ("Plan"). It explains what personal data we may collect and how we may use it and provides additional information to comply with our obligations under privacy laws.

If you have any questions, believe privacy rights have been violated or are concerned there may have been a breach of privacy laws, policies or procedures please email [pensions@howdens.com](mailto:pensions@howdens.com) or contact Clair Hood or Nilam Gardiner.

Clair Hood: by email to [clair.hood@howdens.com](mailto:clair.hood@howdens.com) or by phone on 0207 535 1114

Nilam Gardiner: by email to [nilam.gardiner@howdens.com](mailto:nilam.gardiner@howdens.com) or by phone on 0207 535 1152.

Alternatively you may write to Clair or Nilam at Howden Joinery Pensions, 40 Portman Square, London W1H 6LT.

You should share this notice with your family and dependants where you have provided us with personal information about them.

#### **PROCESSING OF YOUR PERSONAL DATA**

The Trustee of the Howden Joinery Pension Plan (the "Trustee") is a data controller for our processing of your personal data.

#### **WHAT DATA DO WE PROCESS?**

We collect and process various types of personal data about you in order to administer and manage your pension and any dependants' pensions. Personal data broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual. This may include (but is not limited to) personal details such as your name, gender, age, date of birth and contact details as well as employment details such as your earnings, length of service and career history and financial details such as any other income, other pension arrangements and bank account details (e.g. to process pension payments).

We may from time to time hold some special category data (e.g. health information and/or information on your sexual orientation). We may also hold information about criminal convictions if these relate to money owed to the Plan's employers in circumstances where they are entitled to be reimbursed from your benefits.

#### **HOW DOES THE TRUSTEE COLLECT DATA?**

Most of your personal data comes from you or from your employer or former employer, which is one of the employers participating in the Plan (the "Employers"). We may also obtain information from third parties (e.g. HM Revenue & Customs, medical professionals or address tracing agencies).

If you do not provide us with the personal data that we specify is required for administration of the Plan then we may not be able to administer the benefits provided by it.

#### **WHAT ARE THE PURPOSES FOR WHICH DATA ARE PROCESSED AND WHAT LEGAL BASIS APPLIES**

We hold and use personal data for the purpose of administering and managing your pension and paying benefits to you and/or your spouse and dependants.

We rely on an appropriate legal basis whenever we process your personal data. Where processing involves special category data we also rely on an additional legal justification.

Processing will be justified because (a) it is necessary to comply with our legal obligations (e.g. it is necessary to perform our obligations under the trust); (b) because it is necessary for the performance of the contract of employment between you and your employer (e.g. to provide pension benefits); or (c) in other cases to further our legitimate interests as Trustee of the Plan provided this is not overridden by your rights.

In overall terms, we have a legitimate interest in administering and managing the payment of benefits under the Plan in line with the Plan's Trust Deed and Rules and our legal and regulatory obligations. Our processing is designed to support these aims. This is important to enable us to deliver our commitments to the members of the Plan.

Processing of special category data will most commonly occur where necessary to carry out your or our obligations and rights in the field of employment, social security and social protection law in line with applicable laws. There are however other grounds (such as your explicit consent) we may rely on in some situations.

#### **RETENTION OF PERSONAL DATA**

We will keep your personal data stored on our systems for as long as it takes us to provide or administer the Plan benefits provided under the rules of the Plan. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data.

#### **DISCLOSURES OF PERSONAL DATA**

We will transfer your data to the Employers and their advisers, the Trustee's advisers (including the Plan actuary, legal adviser and investment consultant), service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Plan.

We may also disclose your information to third parties:

- in order to operate, administer and audit the Plan responsibly;
- in the event that one or more of the Employers sells its business or assets (in which case we may disclose your personal data to the prospective buyer), or to other persons in connection with a similar change in the Employers' business;

- in the event that we decide to de-risk or insure any of the benefits provided by the Plan (in which case we may disclose your personal data to the prospective insurer or brokers for the purpose of obtaining quotations relating to the Plan or its benefits);
- in the event of it being necessary to facilitate a transfer of your benefits to an alternative arrangement we may disclose your personal data to another pension provider;
- who advise you about your options under the Plan (including any financial adviser or other organisation appointed by the Trustee or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Plan; or
- where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustee, the members of the Plan, or others.

We may also share information with any person who is authorised to act on your behalf, relevant regulators, government departments, law enforcement authorities, tax authorities, ombudsman services, dispute resolution body or the courts.

The entities listed above may also share personal data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

Please note that some of the Plan's former service providers may continue to hold information about you for their own record keeping purposes once they have ceased to be involved with the Plan.

## **SECURITY OF DATA**

We are committed to protecting the security of your personal data. The Trustee use a variety of technical and organisational methods to secure your personal data in accordance with applicable laws.

## **INTERNATIONAL TRANSFER OF PERSONAL DATA**

Your personal data may be accessible or transferred to countries outside of the UK or European Economic Area ("EEA") where required in order for us or the Employers to provide benefits to or in respect of you.

Under data protection law, we can only transfer personal data to a country or international organisation outside the UK or EEA where:

- a particular country or international organisation ensures an adequate level of protection of personal data (known as an "adequacy decision or regulation"). The list of countries that benefit from an adequacy decision or regulation will change from time to time. We will always seek to rely on an adequacy decision or regulation, where one exists; or
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects. The safeguards will usually include using legally-approved standard data protection contract clauses. To obtain information about relevant safeguards, please contact us using the details set out on page 1; or
- a specific exemption applies under data protection law.

## **YOUR RIGHTS AS A DATA SUBJECT**

You have a number of rights in relation to your personal data including the right:

- of access to your personal data;
- to ask us to correct inaccurate or incomplete data;
- to ask us to restrict or delete data in certain circumstances (please note that we may be unable to delete or remove your data whilst we still need this to administer the Plan);
- to object to particular processing in certain circumstances;
- to withdraw consent in the limited circumstances where we may rely on consent; and
- to complain to the Information Commissioner's Office (ICO), as the relevant supervisory authority.

You are entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise your data protection rights, including your rights to access, restrict, object to the processing of, rectify and erase your personal data by contacting Clair Hood, whose details are set out at the beginning of this notice. If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.

## **NOTICE OF CHANGES**

We will review this Data Privacy Notice from time to time and may change or update it at any time. We will tell you about any material changes.

We may undertake certain processing of personal data which are subject to additional Data Privacy Notices and will bring these to your attention where they engage.

## **THIRD PARTY PRIVACY NOTICES**

Where third parties are required to process personal data and make decisions about how it will be used in order to assist with administering the Plan, in certain circumstances they will act as data controllers in respect of such personal data. Like the Trustee, these third parties as data controllers need to give you certain information about how they process your personal data. The third party data controllers listed below have asked the Trustee to provide you with access to their privacy notices which explain how they process personal data and meet their compliance obligations under privacy laws. Copies of the privacy notices can be accessed as set out below:

- Aon Solutions UK Limited, Aon Investments Limited and the Scheme Actuary, currently Lynda Whitney FIA of Aon Solutions UK Limited (together "Aon") - <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp> (or a copy can be requested by contacting: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH or [RI.UK.PrivacyChampions.aon.com](mailto:RI.UK.PrivacyChampions.aon.com)).

- Willis Towers Watson's privacy notice in relation to its insurance broking services to the Trustee will be accessible at [www.howdenjoinerypensions.co.uk/howden](http://www.howdenjoinerypensions.co.uk/howden)

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