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# ***DH&S Retirement and Death Benefits Plan*** Privacy Statement

September 2024

# ***Privacy Statement***

The purpose of this notice is to help you understand how we collect and use your personal information, and what your rights are in respect of that information.

As Trustee of the Plan, we hold certain information about Plan members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Plan will be “personal data”, as it is information from which you as an individual can be identified, which is subject to certain protections.

For legal purposes, the Trustee is known as the “data controller”, as we decide the purpose for and the means by which the personal data we hold is processed.

The Trustee of the DH&S Retirement and Death Benefits Plan (the “Plan”) is committed to protecting your information and acting in accordance with your rights under data protection law.

## ***Collection of your information***

We collect and process some or all of the following information about you:

- your personal details such as your name, sex, gender, date of birth, home address, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Plan), the date you joined and (if applicable) left the Plan, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments; and
- in some cases, special categories of personal data such as your marital status, employment and residency evidence information (in certain cases for transfer requests) or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, or where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependents or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, this information is collected directly from PricewaterhouseCoopers LLP (“the Firm”). We may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser.

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## *How we use your information*

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;
- b) for general administration of the Plan, including: to record and pay benefits; for actuarial valuations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud;
- c) for meeting our on-going regulatory and compliance obligations, and investigating or preventing crime;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Plan;
- e) when we undertake activities from time to time to help us manage the liabilities of the Plan, such as obtaining life insurance, longevity hedging, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- i. necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make the disclosures to the Firm for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of the Firm, to the extent that such interests are not overridden by your privacy interests;
- ii. required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- iii. in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- iv. in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the Plan rules require you to provide information which we cannot otherwise process without your consent.

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Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record or pay your or your beneficiaries' benefits.

### ***Disclosure of your information***

In line with "How we use your information", we may share your information with the following recipients:

- our suppliers, including relevant members of the Firm and other providers of services to us and them, such as administrators, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Plan actuary (for actuarial calculations), the Plan auditor, healthcare practitioners, printing, communication, IT and hosting, marketing, and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure). As at the date of this notice, our key suppliers include: the Firm (both as employer and as a provider of services to us to assist with the running of the Plan); Capita for administration services; Aon for actuarial services; Redington for investment advice; Zedra for secretarial services; Sacker & Partners LLP for legal services; Royal Mail for postal services; Whistl for courier services; and like minds for communications services (such as preparing the Plan newsletter).
- members of the Firm for other relevant purposes, such as for audit purposes, or in relation to corporate transactions initiated by the Firm, or to allow you to flex your benefits including your pensions options;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Some of the Plan's key suppliers, such as the Plan's actuary and administrator, are also data controllers in relation to your personal data. This means that they have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. For further information about what personal data they hold about you and how they use it please contact us using the details below.

### *Transfers of your information abroad*

The use and disclosure of your information, including for the purpose referred to in (e) above, may involve transferring your information outside of the UK (for example, this may happen if computer servers used by our providers are located or backed up in a country outside of the UK). As at the date of this notice, these locations include:

- India
- Poland
- Republic of Ireland

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected so that it continues to be treated securely and in accordance with data protection legislation when it is processed, or otherwise accessed from a location outside of the UK, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the relevant authority in the United Kingdom. Further details of any such transfers are available from us on request.

### *Retention of your information*

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our records management policy. For example, we will keep [financial records for a period of eight years and all other] personal data for a period ending 7 years after the last benefit has been paid and there are no further liabilities in the Plan. We determine the period envisaged within such policy having regard to the Plan's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Plan, and responding to legal claims or regulatory requests.

### *Your rights*

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict or object to its processing, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party, which you can exercise by contacting us at the details set out below.

In the limited circumstances that we rely on your consent to process your personal data (for example, in the scenarios set out in (iv) above), we will request it at the relevant time, and will also explain how it can be withdrawn. If you subsequently choose to exercise your right to withdraw your consent, this will not affect the lawfulness of our use of your information prior to the withdrawal of your consent.

You can also lodge a complaint about our processing of your personal information with the office of the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

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*Further information may be required to carry out requests*

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

*Status of this statement*

This statement was approved in September 2024. It is non-contractual. We reserve the right to amend it from time to time.

*Contact*

Email: [dh&splan@capita.co.uk](mailto:dh&splan@capita.co.uk)

Phone: 0345 6001 150