

The BRE and LPC Pension Scheme (the "Scheme")

Our privacy policy – How we use your personal information

1. Introduction

The Trustees of the BRE and LPC Pension Scheme (the "**Trustees**" or "**we**" or "**us**") collect and use your personal information in order to administer the Scheme and to pay benefits due to Scheme members and other beneficiaries.

The Trustees are committed to protecting your personal information. This statement tells you more about when, from whom and why the Trustees collect your personal information and how we use it.

The Trustees are the data controller of the personal information to which this notice relates; we can be contacted using the details in section 10.

2. Personal information that we collect

The types of personal information that we may collect and use include:

- Your full name, address and contact details
- Your date of birth
- Your sex/gender
- Your marital (or relationship) status
- Your benefit entitlement under the Scheme
- Information about your health
- National Insurance Number and/or other evidence of identity
- Details of your salary and other forms of remuneration
- Details of your bank account
- Details of any nominees to be considered for benefits in the event of your death.

3. Where does your personal information come from?

Most of the personal information that we hold is provided by members when they join the Scheme or when they contact the Trustees (or organisations appointed by the Trustees to help with the running of the Scheme) about their benefits.

Other information about you may be provided by current and former employers participating in the Scheme, other pension schemes and pension providers, independent financial advisers, medical practitioners, other advisers or service providers to the Trustees and Her Majesty's Revenue and Customs (HMRC).

4. What do the Trustees do with your personal information?

The legal basis for us using your personal information is to enable us to comply with our legal obligations as trustees of the Scheme, which include paying benefits to you and other beneficiaries

in connection with members' employment (or previous employment) with an employer participating in the Scheme. We also have a legitimate interest in using your personal information to ensure the efficient administration of the Scheme and to help us and the employers participating in the Scheme review and manage financial matters relating to the Scheme, together with our respective advisers.

In some limited circumstances, the Trustees will only collect and use certain special categories of personal information with your express consent. We will make clear to you when your consent is needed.

If we are not provided with the personal information about you that we need, it may not be possible for us to provide some or all of the benefits otherwise payable in respect of you from the Scheme.

5. Sharing your personal information with other parties

Where the Trustees consider it necessary for the purposes explained in section 4, your personal information may be shared with selected third parties, such as the Trustees' actuarial and financial advisers and other professional services providers, including those who provide data processing, administration and communication services to the Scheme. The Trustees may also share personal information with regulatory authorities and healthcare practitioners, insurers, AVC providers, financial advisers, annuity brokers, employers participating in the Scheme, HMRC, the Pensions Regulator and any other third parties with whom we are authorised or required by law to share personal information.

Some of the third parties with whom your personal information is shared may be located outside the United Kingdom (UK) (for example, this may happen if computer servers used by our providers are located or backed up in a country outside the UK).

Under data protection legislation, we can allow your personal information to be transferred outside the UK if:

- (a) the country to which your personal information is being transferred has been confirmed by the UK Government to provide adequate protection for personal information;
- (b) the entity that is holding your personal information has entered into a written contract or some other form of data transfer mechanism, in each case approved by the UK Government, which requires it to provide all protections to your personal information required by data protection legislation; or
- (c) the consent of the relevant data subject has been obtained.

Further information about transfers of personal data outside the UK can be obtained by contacting us at the address below.

We will also share personal information with the actuary to the Scheme. First Actuarial LLP (the employer of the actuary to the Scheme) and the actuary to the Scheme are joint data controllers with the Trustees when using personal information held in respect of you for the purposes of assessing, with the Trustees, financial matters affecting the Scheme. The current actuary to the

Scheme is: Peter Norman, whose address is: First Actuarial LLP, First House, Minerva Business Park, Lynch Wood, Peterborough, PE2 6FT.

First Actuarial's privacy notice, describing how they use your personal data to support us in the running of the Scheme, can be found at:

<https://privacy.firstactuarial.co.uk/Notices/PensionSchemeMembers>.

6. How long do the Trustees keep your personal information for?

The Trustees will keep your personal information in accordance with our data retention policy as it applies from time to time. We will need to keep personal information for as long as is reasonably necessary to determine members' entitlement to benefits from the Scheme and to comply with our legal obligations in relation to the administration of the Scheme.

7. Accessing and updating your personal information

Data protection legislation gives individuals the following rights in relation to personal information held about them:

- individuals can ask what personal information is held about them and be provided with a copy;
- if personal information held about an individual is incorrect, he or she can ask for it to be corrected;
- individuals can ask for personal information about them to be deleted or for processing of that personal information to cease in certain circumstances, for example, where that information is no longer needed;
- individuals can request that certain types of personal information held about them is sent to them, or another organisation, in a format that can be read by computer; and
- individuals can withdraw their consent to how their personal information is being processed, where that processing is based on their consent.

Exercising these rights is subject to certain restrictions under data protection legislation. For further information about these rights, you should write to:

Bob Jenkinson (Scheme Secretary)
c/o Broadstone Corporate Benefits Limited
23 25 St George's Road
Bristol
BS1 5UU

8. Complaints

If you are unhappy at any stage with how the Trustees are using your personal information, you have the right to lodge a complaint with The Information Commissioner's Office (www.ico.org.uk).

9. Changes to our privacy policy

This statement is subject to regular review and may be updated from time to time. We will tell you if we make any changes to how we use your personal information.

10. Contact us

If you have any questions about how your personal information is used, including in relation to the arrangements we have in place with the scheme actuary, please feel free to contact us at the following address:

Broadstone Corporate Benefits Limited
23 25 St George's Road
Bristol
BS1 5UU

The Trustees of the BRE and LPC Pension Scheme

July 2023