

## ITF Retirement Benefits Scheme (the Scheme) Privacy Notice

You may be aware that the law relating to data protection is changing. The trustees have been reviewing the ways in which they manage the personal data which they hold regarding you and your dependants over the last few months, and this letter sets out arrangements that will apply for the future.

The trustees engage independent administrators to manage the benefits which the Scheme provides. They are First Actuarial LLP. The trustees also appoint an actuary to perform certain functions for them and, in particular, to calculate the benefits that are payable to members. The Scheme actuary is Rob Hammond of First Actuarial. As well as providing the Scheme Actuary, First Actuarial also provide wider actuarial services to the Scheme. First Actuarial have also reviewed their data-handling processes over the last few months and the arrangements outlined below describe the ways in which they will handle data relating to you. You should regard this notice as written on behalf of all third parties who are responsible for the personal data they hold on behalf of the trustees about you, as well as on behalf of the trustees.

### What data do the trustees and their advisers process

The law relates to the protection of 'personal data' meaning any data from which the identity of a living person can be identified. It applies to data held in paper records, as well as data that is held electronically.

In order to administer the Scheme and the benefits it provides, the trustees and their advisers and administrators need to collect, store and transmit personal data relating to you. The data consists of:

- Your name, date of birth, gender and contact details;
- Your marital status and family;
- Your national insurance number;
- Your periods of employment with the ITF;
- Information about the salary you earn from the ITF, now and in the past;
- Information about the contributions you have paid to the Scheme;
- Where relevant, information about the pension benefits you are entitled to under other pension schemes; and
- When your benefits are paid, your bank account details and tax reference.
- We may collect information about how the website is used. Our cookie policy is available on the website at <https://itfpensions.co.uk/Home/CookiePolicy>
- We may collect personal information which you choose to enter in order to use the online retirement modeller. However, this information is not retained.

In some circumstances the trustees and their advisers will also need information concerning your health (where there is a legal basis for the processing of such data under the Data Protection Laws). That primarily relates to the payment of any benefits which depend on the state of your health, and may include the circumstances in which they will arrange for your

benefits to be insured by an insurance company. They won't ask for any information regarding your health without asking you first.

Since the trustees will pay benefits to them in some circumstances, the trustees also need the same information regarding your family members, and any other dependants that you may have expressed a wish to provide for.

The Scheme actuary and First Actuarial need to use your personal data to advise the trustees on the financial management of the Scheme. This advice helps to ensure the trustees are able to meet their obligations to pay members' benefits, and is necessary to comply with the legal administration and funding obligations placed on the trustees and the actuary.

The trustees and their advisers and administrators obtain some of this data from you. They obtain some of it, such as your salary and length of employment with the ITF from the Federation.

### Who do we share this data with?

The trustees and the Scheme actuary are 'data controllers' for the purposes of the data protection legislation. First Actuarial, as a provider of wider actuarial advice, is also a data controller. This means that they decide what data they need to collect and who it needs to be sent to. Some pension scheme administrators engage third parties whose role it is simply to process data ('data processors'). First Actuarial, as the Scheme's administrator, also acts as a data processor, and they occasionally use sub-processors to provide support services such as bulk mailing and IT support.

The trustees, the Scheme actuary and First Actuarial pass information, including your personal data, between themselves in order to administer the Scheme. On occasion they may also need to pass information about you to the ITF. They may be required to pass it to HMRC, the Pensions Regulator and other supervisory organisations. They may need to provide samples of data to the Scheme auditors for cross-checking, when the Scheme's annual accounts are audited. If you have paid additional voluntary contributions, they will also need to share information about you with your AVC provider.

You may, at some stage, want the trustees to pass personal data to an independent financial adviser. If you ask them to, they will of course do so.

In some circumstances they may also need to pass it to other professional advisers, such as the Scheme solicitors if there is any doubt as to the benefits you or your dependants are entitled to, or medical advisers if these benefits depend on the state of a beneficiary's health. If that should come about you will be told.

If the trustees need to find a beneficiary whose address is unknown, they sometimes use a tracing agency to find them. If that applies to you in the future, they will need to pass information about you to the tracing agency.

They also need to make arrangements for storage of paper records and back-up of electronic data, and this might require passing records to outside third-party providers.

Unless you request it (because, for instance, you are living abroad), none of your personal data is supplied to any organisation which is based outside the UK or European Economic Area. It is possible that the trustees or one of their advisers will take laptops and smartphones on trips abroad, and in this way data about you might indirectly be taken outside the UK or the European Economic Area. As outlined below, data on laptops and smartphones is encrypted and password protected.

None of your data is provided to any organisation whatsoever for any purpose which is unconnected with the administration of the Scheme (such as external marketing organisations).

Organisations which process personal data on a regular basis are obliged to appoint an officer called a Data Protection Officer who coordinates all data processing activities and ensures compliance with the legislation. The trustees, and independently First Actuarial, have received legal advice that they do not need to appoint one and they have decided not to do so. They will rely on their professional advisers to ensure that their data handling arrangements comply with the law and best practice.

### Why do we process your data?

Data may only be processed where there is a legal basis for doing so.

One of the recognised legal bases is that the processing is necessary to achieve the 'legitimate interests' of some person or organisation, provided that the processing goes no further than what is necessary to achieve that, and the achievement of those legitimate interests can be reconciled with the interests of the person to whom the data relates in ensuring that their data is kept private.

The trustees have considered the legal basis on which they process your data. They have concluded that:

- They have a legitimate interest in ensuring that the Scheme operates in accordance with the Scheme's rules and relevant legislation;
- The ITF has a legitimate interest in ensuring that the Scheme operates to provide the pension and other benefits you have been led to expect;
- You, of course, have a legitimate interest in ensuring that the Scheme operates to provide the benefits to which you are entitled.

In some instances, we may need to hold and process information relating to your physical or mental health, for example if you are applying for a pension on grounds of ill-health. We will ask for your explicit consent to this, unless there is an alternative legal basis for processing this information under the Data Protection Laws. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

The Scheme actuary and First Actuarial (in their role as actuarial advisers) also hold and use your data because they have a legitimate interest in providing advice to the trustees.

None of these interests can be met without processing data relating to you, and where relevant your family and other dependants. The trustees have therefore concluded that they, the Scheme actuary and First Actuarial have a lawful basis for processing it, and have systems in place to ensure that the processing goes no further than what is necessary.

The trustees, the Scheme actuary and First Actuarial recognise that some of the data they might process is particularly sensitive – such as information about your health. They will only do so if it is necessary to perform the legal obligations that they owe to you and the ITF to ensure that the Scheme is administered in accordance with the Scheme's rules.

## Data security

The trustees have reviewed all of their information systems to ensure that they are secure. Paper records of personal data are stored securely, and electronic records of personal data are encrypted and can only be accessed by authorised personnel. If data needs to be sent to someone it is either sent by secure post or by encrypted and password-protected email. These security measures apply to paperwork and electronic data that is kept or transmitted by the trustees' advisers and by the trustees themselves.

The trustees have checked the security systems of their advisers and administrators, and also the security systems that the ITF has in place regarding any data that the trustees may need to pass to the ITF. They have concluded that they are satisfactory.

## Data retention

The law says that data must not be retained any longer than is necessary. Because the trustees and their advisers and administrators will need to process data relating to you and your family members and dependants for so long as you or they have an actual or potential entitlement to benefits from the Scheme, that means that most data will need to be retained for at least the whole of the life of the people to whom it relates.

The Scheme Actuary and First Actuarial LLP also keep a copy of the information. Should we change our Scheme Actuary, actuarial advisers or defined contribution consultancy providers, First Actuarial LLP 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.

Any personal information input into the online retirement modeller is not retained.

## Your rights

You have some important rights regarding the processing of your data. They apply to the trustees and also to their advisers and administrators.

- You have the right to access the data which is stored and processed that relates to you.
- You have the right to have your data corrected if it is incomplete or inaccurate.
- You have the right to have any data concerning you deleted if there is no longer any reason for storing it or processing it.

- You have the right to restrict or object to the processing of your data if you think it is inaccurate, if you think there is no lawful basis for processing it, or if you think that there is no longer any need to store or process it. If you do, your data will still be stored but will not be used.

You should note that if you choose to restrict the processing of data relating to you, or if you insist on its deletion, the trustees may not be able to administer the Scheme in accordance with their legal obligations, and your benefits may be affected. If they believe that to be the case, the trustees will explain why. If you are not satisfied with their explanation, you have the right to refer your case to the Information Commissioner's Office – see below.

### **The Information Commissioner's Office (the ICO)**

The ICO is the organisation that regulates the way that data controllers and processors store and use personal data. A comprehensive explanation about how data is allowed to be collected, stored and used can be found on the ICO's website at <https://ico.org.uk>

You can make a complaint to the ICO if you think that the trustees or their advisers and administrators are not observing their data protection duties. You can report your concern via the ICO's website, or by telephoning them on 0303 123 1113. You should note that the ICO will usually expect you to raise your concerns with the source of your concern before you raise it formally with them.

### **Who you should contact**

If you would like further information regarding your data protection rights, or if you would like to access the data which the trustees hold regarding you, or to object to or restrict our data processing activities you should contact:

The Trustees of the ITF Retirement Benefits Scheme  
c/o First Actuarial LLP  
Trafford House  
Chester Road  
Manchester  
M32 0RS

Telephone: 0161 348 7498

Email: [manchester.admin@firstactuarial.co.uk](mailto:manchester.admin@firstactuarial.co.uk)

You will find further information regarding First Actuarial's data processing policies and safeguards at <https://privacy.firstactuarial.co.uk/Notices>

**STEPHEN COTTON**  
Chair of the trustees