

# Bell & Clements Group Pension Scheme – Privacy Policy

The Trustees are committed to protecting and respecting your privacy and rights as a member of the Scheme. This Privacy Policy is to notify you of the Trustees' obligations when using your personal data: how and why we will use personal data about you, how we will collect certain personal information, and who we may disclose this personal data to.

For the purposes of the data protection laws (Data Protection Act 2018 and the EU General Data Protection Regulation (EU Regulation 2016/679)), the Trustees are the "data controllers". The Scheme's actuarial advisors, Cartwright Group Limited, including the individual Scheme Actuary are a data controller along with the Trustees. The contact details for the data controllers can be found below.

This policy covers any personal data that we collect and use to operate the Scheme.

<b>The Data Controller for Bell &amp; Clements Group Pension Scheme is:</b>
Bell & Clements Limited 55 King William Street London EC4R 9AD Tel: +44 (0) 20 7283 6222
<b>The Data Controller for Cartwright is:</b>
Cartwright Group Limited 250 Fowler Avenue Farnborough GU14 7 JP Tel: +44 (0) 1252 894883

**The Data Protection Officer for Bell & Clements Group Pension Scheme is:**

Munich Re UK Life Branch  
Plantation Place  
30 Fenchurch Street  
London  
EC3M 3AJ  
Tel: +44 (0) 7939 587885  
Email: [datenschutz@munichre.com](mailto:datenschutz@munichre.com)

Please contact the Data Protection Officer (details above) if you have questions concerning this Privacy Policy.

Please contact Cartwright (details above) to exercise your Data Subject Access Rights. These include:

- Data Portability: The transfer of your personal data to another Data Controller (where applicable).
- Erasure: To have your personal data removed or deleted (this right is not absolute, there must be a valid reason for this request which will be assessed by the DPO).
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate or the processing is unlawful.
- Subject Access Request: To access your personal data and information around its processing.
- To object to direct marketing, profiling and automated decision making (NOTE: these rights do not apply to this Scheme).

If you are unhappy with any response or have a complaint, you can raise this with:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: +44 (0) 303 123 1113

## What information about you do we collect and process

### Personal and Special Categories of Personal Data

Categories of data	Type of information processed (some or all of the following types of data may be processed)	Where the data may come from	Who we may disclose the data to	Purpose of processing	Lawful basis of processing
Individual information	Name, address including post code, gender, date of birth, membership number, telephone / email details, national insurance number, marital status, DOB of spouse / civil partner, divorce details, earmarking orders, pension sharing orders, pension debit details, pension credit details, educational course, address of educational establishment, date education ceases, details of Power of Attorney, benefit nomination details.	Pension scheme members, pension trustees, past pension scheme members, nominated beneficiaries of pension scheme members.	Scheme Actuary, Scheme administrators, Auditors, Banking Advisers, Investment Advisers, Legal Adviser, Principal Employer, Additional Voluntary Contributions Provider. Payroll processing services and HR information system provider. Government agencies. Regulatory bodies.	To maintain your pension scheme membership. For the management and administration of the benefits provided by the Scheme. For auditing purposes.	To support your occupational pension scheme membership. Processing is necessary for the purposes of obligations conferred by law in connection with the pension scheme (legal obligation). Legitimate interest.
Employment and Scheme information	Name and address of current employer, job title, history of your employers who participate(d) in the scheme, member category, pensionable service dates, normal retirement date, scheme specific benefit bases.	Principal employer, pension trustees, pension scheme members, past pension scheme members, nominated beneficiaries of pension scheme members.	Scheme Actuary, Scheme administrators, Auditors, Banking Advisers, Investment Advisers, Legal Adviser, Principal Employer, Additional Voluntary Contributions Provider. Payroll processing services and HR information system provider. Government agencies. Regulatory bodies.	To maintain your pension scheme membership. For the management and administration of the benefits provided by the Scheme. For auditing purposes.	To support your occupational pension scheme membership. Processing is necessary for the purposes of obligations conferred by law in connection with the pension scheme (legal obligation). Legitimate interest.

Categories of data	Type of information processed (some or all of the following types of data may be processed)	Where the data may come from	Who we may disclose the data to	Purpose of processing	Lawful basis of processing
Pension and Benefit information	Salary / remuneration details, pension contributions, additional voluntary contribution details, other benefit details, investment details (avc), pension tax allowances, protected benefit details, preserved member and pension/benefit details, pensioner member and pension/benefit details, spouse/civil partner/dependent member and pension/benefit details, beneficiaries, payroll data, pension increase details.	Pension trustees, pension scheme members, past pension scheme members, nominated beneficiaries of pension scheme members.	Scheme Actuary, Scheme administrators, Auditors, Banking Advisers, Investment Advisers, Legal Adviser, Principal Employer, Additional Voluntary Contributions Provider.  Payroll processing services and HR information system provider.  Government agencies.  Regulatory bodies.	To maintain your pension scheme membership.  For the management and administration of the benefits provided by the Scheme.  For auditing purposes.	To support your occupational pension scheme membership.  Processing is necessary for the purposes of obligations conferred by law in connection with the pension scheme (legal obligation).  Legitimate interest.

## Protection of your information

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access or loss of your information.

## **Data Retention**

Your personal data will only be kept for as long as it is necessary for the purpose it was collected for.

Pensions are a long term commitment, members build up benefits over long periods of time and can be drawing them for thirty years or more. Therefore, it is the Trustees policy to hold data in respect of you after you leave the Scheme and after all obligation to pay benefits to you and/or any of your dependent's under the Scheme, has been extinguished.

We review personal data held in relation to the Scheme on a regular basis in accordance with our data retention/destruction policy. If it is concluded that certain personal data is no longer needed, that personal data will be destroyed.

## **Transfer of Data**

We do not transfer your personal data to any countries outside of the EEA. In the event that we do have to transfer your personal data to a country outside of the EEA, we will ensure that appropriate safeguards are in place to protect your data.

## **Changes to this Privacy Policy**

Any changes made to this privacy policy will be published on the website (<https://www.bellandclements.com/privacy-policy>) and sent to pension scheme members in paper format.