

The London United Busways Retirement Benefits Plan ("Plan")

Privacy Notice

This notice is issued on behalf of London United Busways Trustee Company No.3 Limited as Trustee of the Plan ("Trustee"). It explains how the Trustee collects, holds and uses personal data in relation to the Plan.

The Trustee has to keep certain personal data about you in order to administer your benefits under the Plan. The Trustee takes the security of your data very seriously and takes steps to ensure that:

- no more data is held about you than is necessary;
- the data is kept up to date; and
- the information about you is not disclosed to third parties other than as required to administer the Plan and data will be anonymised where practical.

For the purpose of data protection legislation, the data controller is the Trustee; our actuarial advisers, First Actuarial LLP ("First Actuarial"), and the Plan Actuary, Emily Brown, (c/o First Actuarial), are joint controllers with the Trustee. First Actuarial's privacy statement is available at: <https://privacy.firstactuarial.co.uk/Notices/PensionSchemeMembers>

Although as joint controllers First Actuarial and the Plan Actuary are responsible just as the Trustee is for keeping the data they hold about you safe and secure in accordance with data protection legislation, they will not be in contact with you directly. If you have any questions for the Trustee, First Actuarial, or the Plan Actuary please contact the Plan Secretary to the Trustee using the contact details shown at the end of this notice.

The controllers hold and use your data (referred to as "processing" under data protection legislation).

Other parties such as the Plan's administrators, Aptia UK Limited ("Aptia"), process your personal data on behalf of the Trustee. Personal data may also be processed occasionally by the Trustee's advisers, such as legal advisers and auditors, and other third parties where they need the data in order to fulfil their roles. Such processing is only carried out by these third parties on the express instructions of the Trustee.

Why do we hold your personal data?

The data about you is held for the purposes of administering the Plan, including to calculate and pay benefits. The ways that the Trustee will use your information include:

- Identifying you and your survivors and making sure your details are up to date
- Communicating with you
- Calculating and paying your benefits
- Making Trustee decisions – such as whether to agree to early payment or how to distribute benefits after your death, as applicable
- Deciding how to invest contributions paid by you or your employer

We hold this information because processing your personal data is necessary for compliance with our legal obligation to administer the Plan.

There may be circumstances when we do not need your personal data to comply with our legal obligations, but we consider that we have a legitimate interest to hold it in order to ensure that

you or your dependants receive the benefits you are entitled to receive, and to ensure that the Plan is well run.

What personal data do we collect and how?

The Trustee may collect and process information you provide to them in connection with the Plan. This could include your date of birth, gender, marital status, length of employment, bank details, National Insurance Number and details of your dependants. It will also include your contact details such as residential address, email address and telephone number.

We need this information in order for us to correctly calculate and pay your Plan benefits. You may have to provide some of this personal data to us as a condition of membership of the Plan, or by law, for example if you are required to tell us about benefits you have taken from another pension arrangement. Data such as your pensionable salary and service details may also be obtained from or confirmed with your employer. If you do not provide us with this information, we will not be able to properly and accurately administer your benefits under the Plan and you may not receive the benefits you are entitled to.

We may process sensitive personal data relating to you, for example, data concerning your health (in respect of ill-health early retirement options), or regarding your sexual orientation (which may be identified from information provided about your spouse/partner, or from information held within death benefit nomination forms). We will normally hold this sensitive data with your consent. You may withdraw that consent at any time, in which case we may erase that sensitive data if possible and if we have no other lawful reason to keep it. However, if we consider that doing this will prevent us from paying the correct benefits to you or your dependants, we will let you know before proceeding.

We will receive information from you about your proposed beneficiaries, who might be eligible to receive benefits on your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them.

We may also collect information from other parties such as previous or future employers, anyone who might be entitled to benefits as a result of their connection with you, family members or personal representatives, people who have named you as a potential beneficiary in relation to their own pension benefits, or government bodies or departments such as HMRC.

Who do we disclose your personal data to?

In the course of administering the Plan, the Trustee will engage its professional advisors and third parties to assist.

In particular, data may be passed to:

- The Plan's administrators, Aptia
- The Trustee's advisers and service providers
- Fund managers
- The Plan's principal employer
- HM Revenue & Customs when you are paid benefits from the Plan and for the purpose of administering your benefits if you have been contracted out of the State second pension through your membership of the Plan
- Insurance companies if the Trustee intends to secure your benefits through an annuity policy

- Law enforcement agencies, courts, tribunals, ombudsmen and regulatory or similar bodies, to comply with our legal and regulatory obligations or where necessary to establish, exercise or defend a legal claim
- Third parties approved by you or in response to a request for information submitted by you or on your behalf, for example financial advisers, other representatives acting on your behalf or pension dashboard providers
- Tracing agencies

Some processing may also involve transferring personal data to countries outside the UK. Your information is only transferred where appropriate protections are in place. If you would like further information about this, please contact the Plan Secretary at the address below.

How long will you store my personal data for?

Your personal data will be kept for as long as it is necessary to administer your benefits. Data may be kept after you have ceased to be a member of the Plan and there are no further benefits payable in respect of you if the Trustee considers that retention of the data is necessary for the proper administration of the Plan, for example to show how the liability for your benefits was discharged.

What rights do I have?

You have the right to:

- Obtain a copy of the personal data held about you;
- Have the data rectified, if it is inaccurate;
- Restrict the processing of your data;
- Withdraw any consents you have given to us in respect of your sensitive personal data, where we are relying on your consent;
- Complain to the Trustee or ICO about your data

If we hold your data because we have a legitimate interest in doing so (and not to comply with a legal obligation), you may also have the right to:

- Have the data erased if it is no longer necessary for the Trustee to hold it for the purposes of administering the Plan;
- Object to our processing of your data.

You can find more information about your rights on the Information Commissioner's Office's website: <https://ico.org.uk/>.

To exercise any of your rights, you can contact the Plan Secretary using the contact details below.

Fiona Young
Gallagher Benefit Services
One Angel Court, Floor 6
London
EC2R 7HJ

Email: fiona_young@ajg.com

Complaint channels

If you are unhappy with the way your data is being handled, you may raise a complaint with the Trustee. You may do so by contacting the Plan Secretary by using the below contact details:

Fiona Young
Gallagher Benefit Services
One Angel Court, Floor 6
London
EC2R 7HJ

Email: fiona_young@ajg.com

We will acknowledge receipt within 30 days of receiving your complaint and take reasonable and proportionate steps necessary to investigate complaints fairly and in a timely manner. We will provide regular updates on the progress of our investigation into your complaint and let you know promptly if we need any further information to carry out our investigation. Please note that the length of time it will take us to investigate and resolve a complaint depends on the complexity and nature of the issue.

Once the Trustee has reached a decision, we will inform you of the outcome without undue delay.

You can also complain to the Information Commissioner's Office using the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 or 01625 545 745
Email: casework@ico.org.uk

You do not need to take any action as a result of this privacy notice. However, if you have any questions please contact the Plan Secretary on behalf of the Trustee via email at fiona_young@ajg.com or write to her at:

Gallagher Benefit Services
One Angel Court, Floor 6
London
EC2R 7HJ

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