

## **CPT PRIVACY NOTICE**

### **BRITISH COAL STAFF SUPERANNUATION SCHEME**

Date: 8<sup>th</sup> June 2026

#### **What Does This Privacy Notice Cover**

We are Coal Pension Trustees Services Limited (“**CPT**”, “**we**”, “**us**” or “**our**”). We provide trustee services (“**Services**”) to the trustee (the “**Trustee**”) of British Coal Staff Superannuation Scheme (the “**Scheme**”). During the course of providing our Services, we process personal data of members of the Scheme (“**Member**”), individuals who receive benefits from the Scheme (“**Dependants**”) and other individuals who make communications, enquiries or claims to us or the Trustee in relation to the Scheme (“**Related Individuals**”) (collectively “**you**”). Where we refer to “personal data” we mean any information relating to an identified or an identifiable individual, as defined in the UK General Data Protection Regulation (“**UK GDPR**”).

We are committed to protecting your personal data and complying with applicable data protection laws including the UK GDPR and the Data Protection Act 2018. This “Privacy Notice” explains what personal data we hold about you, how we collect it, the reasons we use it, the organisations with whom we share it, how we protect it and what your rights are.

We will review this Privacy Notice from time to time (at least annually) to ensure it remains up-to-date and will take appropriate steps to bring any amendments to your attention consistent with the significance of the changes we make.

#### **Who We Are**

When we collect or use your personal data for the Services, we are the “**controller**” for the purposes of the UK GDPR data protection laws. This means that we decide how and why your data is processed. We are registered with the UK’s data protection authority (“**ICO**”) under reference Z5239495.

Similarly, other parties involved in running the Scheme will also need to make decisions about how your personal data will be used, including the Scheme actuary and other advisers. If you want more information from any of the organisations who receive your personal data from us, or to exercise any rights in relation to the information they hold, please contact us using the details in the section “How to Contact Us”.

If you provide us with the personal data of other persons (such as Dependants or Beneficiaries), please make sure the respective persons are aware of this Privacy Notice and only provide us with their personal data if you are permitted to do so and such information is accurate.

### **How to Contact Us**

If you have questions or concerns in relation to our processing of your personal data, please contact us at using the following

- *Email:* Data.protection.BCSSS@coal-pension.org.uk
- *Post:* Coal Pension Trustees Services Ltd,  
Ground Floor, Ventana House,  
Concourse Way, Sheaf Street  
SHEFFIELD  
South Yorkshire  
S1 2BJ

### **What Personal Data We Collect and How**

Due to the nature of our Services to the Trustee, we need a range of personal data about individuals in order to carry out the purposes outlined in the section “Why We Collect Your Personal Data”. The personal data we process include the following:

- *Basic Personal Details* – Name, gender, date of birth, home address, contact details (telephone, email), national insurance number, marital status, spouse and dependant information, Scheme Member ID number, passport copies
- *Employment Information* – Salary information, employment information, date of retirement, HMRC contracted out dates
- *Financial Information* – Bank account details, additional voluntary contributions, pension sharing orders, tax protections or other adjustments, details of any beneficiary nominated to receive benefits
- *Scheme Information* – Date of joining Scheme, date of leaving Scheme, date of death of Member, pension and lump sum amounts, refunds
- *Communications* – Records of communication exchanged between you and us

As part of running the Scheme, from time to time we also need to process “**special categories of personal data**” (as defined in the UK GDPR) about you. This includes the following:

- *Health Information* – Medical reports on the Member’s health conditions

If we need your consent to process such personal data, we will ask you to provide it at the relevant time. Please note that you can withdraw your consent at any time by contacting us using the details in the section “How to Contact Us”.

We collect your personal data primarily from the Trustee and from you directly.

### Why We Collect Your Personal Data

In the table below, we explain why we use your personal data and the lawful bases (as set out under the UK GDPR data protection laws) we rely on:

Processing Activity	Types of Personal Data	Lawful Bases of Processing
<p><u>Providing the Services</u></p> <ul style="list-style-type: none"> <li>• We will use your information to provide our Services to the Trustee.</li> <li>• Examples of specific activities include the following: <ul style="list-style-type: none"> <li>○ To review and respond to your queries</li> <li>○ To calculate your individual benefits</li> <li>○ To carry out bulk calculations</li> <li>○ To carry out GMP reconciliation and rectification</li> <li>○ To investigate overpayment cases</li> </ul> </li> </ul>	<p><u>Standard Personal Data</u></p> <p><i>Members</i></p> <ul style="list-style-type: none"> <li>• Basic Personal Details</li> <li>• Employment Information</li> <li>• Financial Information</li> <li>• Scheme Information</li> <li>• Communications</li> </ul> <p><i>Dependants &amp; Related Individuals</i></p> <ul style="list-style-type: none"> <li>• Basic Personal Details</li> <li>• Financial Information</li> <li>• Communications</li> </ul> <p><u>Special Categories of Personal Data</u></p> <p><i>Members</i></p>	<p><u>Standard Personal Data</u></p> <ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul> <p><u>Special Categories of Personal Data</u></p> <ul style="list-style-type: none"> <li>• Consent</li> <li>• Necessary for legal claims</li> </ul>

<ul style="list-style-type: none"> <li>○ To carry out member population analysis</li> </ul>	<ul style="list-style-type: none"> <li>• Health Information</li> </ul>	
<p><u>Comply with regulatory requirements</u></p> <ul style="list-style-type: none"> <li>• We process your personal information to comply with our legal obligations</li> </ul>	<p><u>Standard Personal Data</u></p> <p><i>Members</i></p> <ul style="list-style-type: none"> <li>• Basic Personal Details</li> <li>• Employment Information</li> <li>• Financial Information</li> <li>• Scheme Information</li> <li>• Communications</li> </ul> <p><i>Dependants &amp; Related Individuals</i></p> <ul style="list-style-type: none"> <li>• Basic Personal Details</li> <li>• Financial Information</li> <li>• Communications</li> </ul> <p><u>Special Categories of Personal Data</u></p> <p><i>Members</i></p> <ul style="list-style-type: none"> <li>• Health Information</li> </ul>	<p><u>Standard Personal Data</u></p> <ul style="list-style-type: none"> <li>• Necessary for compliance with a legal obligation</li> </ul> <p><u>Special Categories of Personal Data</u></p> <ul style="list-style-type: none"> <li>• Necessary for the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security</li> <li>• Necessary for Legal Claims</li> </ul>

## How We Lawfully Process Your Personal Data

We are allowed to process your personal data for the lawful bases as set out in the section “Why We Collect Your Personal Data”. We provide further explanation on the lawful bases of processing below:

- *Legitimate Interests*: We are permitted to process your personal data if it is based on our “legitimate interests” i.e. we have good, sensible, practical reasons for processing your personal data which is in our interest. These interests are effectively the purposes of our processing of your personal data set out in the section “Why We Collect Your Personal Data”. For example, we have legitimate interests to collect and process your personal data in order to administer the Scheme and to provide benefits for you and your Dependents. To rely on this lawful basis, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You

can object to the processing of your personal data that relies on legitimate interests. Please refer to the section “Your Rights Over Your Personal Data” for more information.

- *Consent:* Sometimes we want to use your personal data in a way that is optional for you. For example, we need to process personal data relating to your physical or mental health 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 in the section “How to Contact Us”.
- *Necessary for compliance with a legal obligation:* We rely on this lawful basis where we are required to comply with a legal obligation.
- *Necessary for legal claims:* We can process special categories of personal data and criminal offence related information if the processing is necessary for the establishment, exercise or defence of legal claims.
- *Necessary for the obligations and exercising specific rights of the controller or of the data subject in the field of social security:* We rely on this lawful basis where we are required to comply with our regulatory obligations.

### **Who We Share Your Personal Data With**

To carry out the activities outlined above, we share your personal data with Capita Employee Benefits Limited (“**Capita**”) which has been appointed by the Trustee to act as the scheme administrator for the Scheme, processing your personal data as the Trustee’s processor.

We also need to share your personal data with certain third parties that act as separate controllers. These organisations are as detailed below:

- The Government Actuary Department, who act as the actuaries of the Scheme and carry out valuations of the Scheme’s liabilities and assets
- Our professional advisers to obtain legal and audit advice
- The Scheme’s provider of Additional Voluntary Contributions (Prudential), for Members who made these contributions
- Civica, which runs the Scheme’s Pensioner Representative Trustee election process

- Tracing agents who locate missing Members and confirm continuing entitlement to benefits in the UK
- Regulatory bodies including the HM Revenue & Customs, the Department of Work and Pensions and the Pensions Regulator
- The Pensions Ombudsman and the Money and Pensions Service
- The Secretary of State for Energy Security and Net Zero of the United Kingdom in the capacity of guarantor of the benefits of the Scheme
- The Coal Industry Social Welfare Organisation (CISWO), a national charity supporting former British Coal employees and their families, to help us to obtain information to support claims for adult dependant benefits and other discretionary awards. The consent of potential Dependants will be obtained by CISWO in these circumstances
- Professional medical advisers when you are being considered for ill-health benefits (transfer of your personal data to these advisers is only carried out with your express permission)
- Third parties to whom you ask us to disclose your information, for example where you wish to transfer your pension or where you instruct an independent financial adviser

We also share your personal data with third party providers that we appoint to act as our **“processors”** (as defined in the UK GDPR). This means that these providers are only permitted to process your personal data in accordance with our instructions.

We do not make your personal data available to any company for commercial purposes. Where third parties (including both controllers and processors) are given access to your personal data, we will take the required contractual, technical and organisational measures to ensure that your personal data is processed only to the extent necessary and in accordance with applicable data protection laws.

### **Transferring Your Personal Data Outside the UK**

We will transfer your personal data outside the UK if, for example, you are resident in a country outside the UK and we are required to send your personal data to a recipient (other than yourself) in that location or to obtain services from our external service providers. For all international transfers of data, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this Privacy Notice and in accordance with the data protection laws. Safeguards that we implement include applicable standard contractual clauses approved by the UK Secretary of State

or other applicable contractual measures to ensure that your personal data is sufficiently protected outside of the UK.

Please contact us using the details in the section “How to Contact Us” if you would like more information on this topic.

### **Security of Your Personal Data**

We use appropriate technical and organisational measures to protect the personal data that we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. When we pass your personal data to a third party, we seek to ensure that they have appropriate security measures in place to keep your personal data safe and to comply with general principles in relation to data protection.

Please contact us at using the details in the section “How to Contact Us” if you would like more information on this topic.

### **Retention of Your Personal Data**

We retain your personal data in accordance with our data retention policy. The standard retention period that we apply to your personal data is 15 years from the cessation of the Scheme. This is based on the need for us to retain your personal data for as long as reasonably necessary to fulfil the purposes of processing as explained in this Privacy Notice such as providing the Services and satisfying any legal, accounting, tax, regulatory or reporting requirements.

Please contact us using the details in the section “How to Contact Us” if you would like more information on this topic.

### **Your Rights over Your Personal Data**

You have the following rights as a data subject under the UK GDPR data protection laws in relation to your personal data:

- Right to rectification (to have incorrect or incomplete personal data updated)
- Right of subject access (to determine and receive a copy of your personal data held by or on our behalf)
- Right to be forgotten (to have your personal data deleted or removed if it is no longer necessary for the purposes of processing as set out in this Privacy Notice)

- Right to restrict processing (to limit the way that we use your personal data)
- Right to data portability (to obtain and reuse your data for your own purposes)
- Right to object to processing (where we are relying on legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground)
- Right to reject automated decision making (including profiling, where the decision has a legal or significant impact on you)

If you would like to get in contact us in relation your rights under the applicable data protection laws, please contact us using the details in the section “How to Contact Us”.

Raising a complaint - If you have any concerns about how we process your personal data and/or believe that we have infringed the data protection laws, you have the right to raise a complaint with us. You can do so by contacting us using the details set out in the section “How to contact us”. Any complaint will be handled in accordance with our internal procedures and in compliance with the data protection laws. We would be grateful for the opportunity to respond to your complaint first.

You have the right to lodge a complaint with the relevant data protection regulator (in the UK, this is the ICO) in relation to the way we process your personal data. For the ICO, you can contact them through their preferred contact methods at the following link - [Make a complaint | ICO](#).