

### **Keeping your data secure**

As Trustees of British Coal Staff Superannuation Scheme (“**the Scheme**”) we take the protection of the personal information of members of the Scheme (including their dependants and nominated beneficiaries (“**you**”)) very seriously.

This “Privacy Notice” is a formal statement of the information we hold about you, the reasons we hold it, the organisations with whom we may share it, and our commitment to ensuring that your privacy is protected.

### **Your information**

#### **We need to use your information for administration of the Scheme**

We will use your information for the general administration of the Scheme. This means we will use your information for the following purposes:

- To record your contributions, track entitlements and pay pensions and other benefits that are payable under the Rules of the Scheme.
- To communicate in relation to your contributions, entitlements and benefits and updates about the Scheme.
- To obtain actuarial valuations and other advice from our professional advisers.
- To deal with any complaints you might make.
- To conduct elections and elect trustees.
- To meet our on-going regulatory and compliance obligations.
- To conduct statistical and reference exercises.

We carry out these obligations because we are under a duty to provide pensions and manage the Scheme on behalf of the members.

#### **We will also use your information for purposes connected with the Scheme**

The normal reason we use your information is that we have a legitimate interest in ensuring that your benefits in the Scheme are paid correctly; this includes carrying out the following activities:

- We will manage our internal systems, processes and our use of technology, including testing and upgrading of systems. We do this to ensure that our systems and processes operate correctly and effectively.

- We will provide you with newsletters and flyers and obtain your feedback about the operation of the Scheme. We do this to keep you up to date with developments affecting the Scheme and to check we are running the Scheme effectively.
- We will try to locate you if you move without providing us with new contact details, so that we can contact you about the Scheme and pay your benefits.
- We will seek to confirm if you are still entitled to your benefits by confirming that you are still alive and that your dependants are still entitled to any benefits they receive, so that we only pay benefits to those entitled to them.
- We will use your information in order to prevent or detect crime or fraud, so that we protect the Scheme from criminal activity. We will also disclose your information to third parties where we are required to disclose that information by law or by an order of the court.

**We also sometimes handle ‘sensitive personal information’ which includes information about your health or sexual orientation. In these cases we will require your consent to handle this information:**

- We will consider requests by you to access your benefits on the grounds of ill-health. This will require us to consider information about your medical condition. You will be asked to give specific consent to the use of this sensitive personal information at the time you are considered for those benefits.
- We will keep details of any beneficiary you nominate to receive your benefits. You will be asked to consent to this at the time you submit your nomination.

**In the following circumstances we may also share your information with other parties, but only with your consent:**

- We will disclose your information to third parties at your request, such as in relation to transfers to other schemes. We will only do this if you have consented to this disclosure.

**We collect a range of information about you to carry out these purposes**

To carry out these purposes, we hold and use the following information about you:

- Personal details such as your name, gender, date of birth, home address including postcode, National Insurance number, bank account details, marital status, dependants and country of residence.
- Information relating to your benefits, including your member identifying number, the date you joined or left the Scheme, your earnings, pensionable earnings, the category and value of contributions you made and benefits that you receive, your retirement age, and any relevant matters impacting your benefits such as additional voluntary contributions, pension sharing orders, tax protections or other adjustments.
- Health details in relation to any claim to ill health retirement or incapacity to manage your own affairs.
- Records of communications with you.

- We will obtain some of this information from you. We also obtain information from the archived records of British Coal and associated employers to which we have access, other pension schemes, tracing agents, the Coal Industry Social Welfare Organisation and our medical advisers.

### **We need to disclose your information to third parties**

To carry out these purposes we also need to disclose your information to the following third parties:

- Capita Employee Benefits are the key service provider that we have selected to administer your benefits and run the Scheme payroll.
- 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: these are Linklaters LLP for legal advice, Ernst and Young our auditors, and PwC who provide internal audit services.
- Our provider of Additional Voluntary Contributions (Prudential), for members who made these contributions.
- The Electoral Reform Society, to run our Pensioner Representative Trustee election process.
- Tracing agents, who locate missing members and confirm continuing entitlement to benefits in the UK.
- HM Revenue & Customs, the Department of Work & Pensions, The Pensions Regulator and other regulatory bodies.
- The Pensions Ombudsman, the Pensions Advisory Services and the Money and Pensions Service, where you have consented to that disclosure.
- ITM, a pensions specialist, to help us with Guaranteed Minimum Pension data related projects.
- The Secretary of State for Business, Energy and Industrial Strategy in the capacity of Guarantor of the benefits of members of the Scheme.
- The Coal Industry Social Welfare Organisation (CISWO), a national charity supporting former miners and their families, to help us to obtain information to support claims for adult dependant benefits. 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 data to these advisers will only be done with your express permission.
- BoardPacks – an online service that enables the papers being accessed for the meetings of the Trustee and Sub-Committees to be accessed securely.
- We also use other service providers who use the information on our instructions, including to provide us with information technology services, archive our records, and send mailings.

- 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 do not make your information available to any company for commercial purposes.

### **We transfer your information outside the EU if you are based outside the EU**

If you are based outside the EU, we will transfer your information outside of the EU in order to pay you. In this case, we will also transfer your information outside the EU in order to trace you if we lose contact with you, to confirm your continuing entitlement to benefits and to send you general information about the Scheme. We will also transfer your information outside the EU if you ask us to transfer your information to an overseas pension provider. We do this because you have consented to this disclosure to allow us to make such overseas payments or because we have taken other measures to ensure that we continue to protect your information.

**Note:** If you are **based outside the UK, but within the EU**, we transfer your data in the same way and for the same purposes.

Please contact us at the address set out below if you want more details.

### **Retention of your information**

In general, we will retain your information for as long as may be required, unless we receive a request for data to be deleted that will not impact on our ability to pay your pension entitlement.

### **Your rights over your information**

You have rights under data protection law to access and correct your information and (in some circumstances) to restrict its use or have it deleted.

You also have the right to object to the processing of your information in some circumstances.

You can exercise any of these rights by contacting us at the address set out below.

You also have the right to withdraw your consent to the use of your information, to the extent that such use is based on your consent. You can notify us of your withdrawal of consent by contacting us at the address set out below.

You can also lodge a complaint about our processing of your personal information with a supervisory authority in the Member State where you habitually reside or work, or where a breach has taken place. Details for the office of the Information Commissioner in the UK are available at [www.ico.org.uk](http://www.ico.org.uk).

### **Keeping this policy updated**

This Privacy Notice was formally adopted by the Trustees in May 2018. We will review it from time to time, and at least annually, to ensure it remains up-to-date, and will take appropriate steps to bring any amendments to your attention.

The current Privacy Notice and previous versions will be displayed on the Scheme website.

### **Contacting us about your information**

If you wish to contact us about any of the matters set out above, please write to:

Data Protection Compliance

BCSSS

Ventana House

2 Concourse Way

Sheaf Street

Sheffield S1 2BJ

Or by email to [data.protection.bcsss@coal-pension.org.uk](mailto:data.protection.bcsss@coal-pension.org.uk)