

## **Fair Processing Notice Gleeds Retirement Benefits Scheme**

The Trustees and the Scheme Actuary hold and process personal data about you and any spouse and dependants obtained either from you, your spouse or dependants, your employer or (if the Trustees do not have up-to-date contact details for you and are trying to locate you) from a tracing agent. This data is held to be able to operate the Scheme and administer your benefits in it, and is used by the Scheme Actuary to advise the Trustees on the financial management of the Scheme. This means that the Trustees and the Scheme Actuary are 'data controllers' under data protection legislation, and have to inform you of certain information, which is set out in this notice.

Your data is held by the Scheme's administrators, currently First Actuarial LLP ("**First Actuarial**") who are responsible for administering the Scheme on behalf of the Trustees. Additionally, in order to operate the Scheme and administer your benefits, the Trustees may need to disclose your data to other people, such as the Scheme Actuary, the Trustees' other professional advisers, the Scheme's principal employer, Gleeds UK and its affiliates, tracing agents and insurance companies, to arrange particular entitlements, for instance life insurance or an annuity policy where relevant.

The Scheme Actuary is different from the other recipients of personal data because, when carrying out his role, he can be involved in determining the purposes and manner for which any personal data is processed. As noted above, this means he is a 'data controller' whereas other recipients are 'data processors'. The responsibilities of data controllers and data processors under data protection legislation are different. Please note that the Scheme Actuary will not disclose your data to other third parties without the prior agreement of the Trustees. References to the Scheme Actuary in this notice include First Actuarial to the extent it provides actuarial consulting services to the Trustees.

The data the Trustees and the Scheme Actuary (where relevant) hold is the information necessary to administer your benefits and this includes your name, gender, date of birth, NI number, address, marital status, salary information and (where your pension is in payment) bank details.

In certain circumstances the Trustees may also request and process more sensitive personal data about you (known as special categories of data), for example medical information if you wish to take your benefits under the Scheme early due to ill health. Where relevant, this data may also be disclosed to, held and processed by the Scheme Actuary. It is necessary for the Trustees and the Scheme Actuary (if relevant) to hold and process these special categories of personal data (as well as the other data outlined above) to comply with the legal obligations the Trustees and the Scheme Actuary are subject to, and in order for them to comply with their obligations under the trust deed and rules governing the Scheme and/or overriding legislation.

The Trustees will retain your data whilst benefits are due and payable to you or your dependants from the Scheme. Due to the long term nature of the Scheme the Trustees will normally continue to store your data for at least 12 years from the date that benefits payable to your or your dependants have been paid in full, or you transfer out of the Scheme. However, to enable the Trustees to comply with their legal obligations and in order to be able to answer queries about how your benefits were dealt with (which could be made many years later), it may be necessary for some information to be retained for longer than this. Any processing of your data once you have transferred out of the Scheme or all your benefits have been paid in full will only take place where strictly necessary.



The Scheme Actuary will normally continue to store your data for a minimum of 1 year and maximum of 7 years from the date he ceases to provide actuarial services to the Trustees.

Your data will usually be stored within the UK or the European Economic Area ("**EEA**"). However, if you live or work outside of the UK or the EEA, the Trustees and/or Scheme Actuary may need to transfer your data outside of the UK or the EEA in order to respond to any queries that you may have. Where this applies, all steps reasonably necessary will be taken to ensure that your data is treated securely and in accordance with this notice. If you wish to know more about this, please contact First Actuarial at:

First Actuarial LLP  
Mayesbrook House  
Lawnswood Business Park  
Leeds  
LS16 6QY  
Tel: 0113 818 7300  
Email: [leeds.admin@firstactuarial.co.uk](mailto:leeds.admin@firstactuarial.co.uk)

It is important to inform the Trustees of any changes in your personal details to ensure the information held is accurate and kept up to date. If you need to do this, or wish to know more about the information held by the Trustees or the purposes for which it is held, please contact First Actuarial using the following contact details above.

In addition, you are entitled to request access to or removal of any personal data being held by or on behalf of the Trustees, or by the Scheme Actuary, though if you were to request the removal of your personal data the Trustees would be unable to administer your benefits.

If you have a complaint about the Trustees' or the Scheme Actuary's management of your data, you have the right to lodge a complaint with the Information Commissioner's Office, which can be contacted on 0303 123 1113 or via other methods of communication as explained on their website (currently <https://ico.org.uk>).