



Port of London Authority (Upper Division Staff) Widows', Widowers' & Orphans' Pension Fund

Who we are

The Committee ("the Committee") is the trustee of the PLA (UDS) Widows', Widowers' & Orphans' Pension Fund ("the Scheme").

As the trustee of the Scheme, the Committee holds certain personal information (known as "personal data") about members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Committee in running the Scheme will be personal data.

For legal purposes, the Committee is known as the "data controller", as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your address
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries
- medical and other details about your health.

How we use that information

The Committee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation.

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Committee must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

However, as the Committee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current, past or future employer
- the Committee's professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser and lawyers
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Committee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers who help us prepare various communications we send to you, such as the annual funding statement
- insurance companies for the purposes of Scheme benefits including additional voluntary contributions
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System in the UK and/or a payment via Equinity the administrators' banking providers when pensions are being paid overseas
- mortality tracing agencies
- Rothesay Life is an insurance company which provides insured benefits to certain members of the Scheme. It has a separate obligation to provide information to you about how your personal data is used in the provision of its services – you can see this at <https://www.rothesay.com/data-protection/>

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data for a minimum of 6 years. But, given the nature of pension schemes, the Committee may be required to keep some of your personal data for the rest of your life.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate/wrong, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Committee to restrict the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Committee can override this objection in certain circumstances.

Withdrawing consent – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Committee to continue processing your personal data where this is justified.

- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Committee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

The Committee may charge a small fee to cover the administration costs involved in providing you with a copy of your personal data.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice

- make a complaint about how we have handled your personal data please contact the PLA Pensions Manager.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is the latest version as at July 2022. This notice will be updated from time to time and you can request the current version at any time by contacting the PLA Pensions Manager