

Thomson-Leng Superannuation Fund and Thomson-Leng Provident Fund

Privacy Notice

PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR DEPENDANTS

1 INTRODUCTION

This privacy notice has been issued by D.C. Thomson & Company Pension Trustee Limited (the "Trustee") as trustee of the Thomson-Leng Superannuation Fund and the Thomson-Leng Provident Fund (each a "Fund", together the "Funds"). When we say "we" or "us" in this privacy notice we are referring to the Trustee.

As Trustee of the Funds, we need to collect and use personal information about our members and their dependants.

This privacy notice sets out how we collect, use and protect your personal information, and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

For the purposes of data protection law, the Trustee is a 'data controller' in relation to your personal information.

The Actuary to the Funds is also a 'data controller' in respect of your personal information that they use to carry out their work for the Funds.

2 PERSONAL INFORMATION WE USE

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Funds' sponsoring employers and information we get from other sources, including public databases.

2.1 What information may we collect directly from you?

The categories of personal information that we collect directly from you include:

- a. personal details (for example, your name, gender and date of birth);
- b. your bank details and national insurance number;
- c. your contact details (for example, your address, phone number and email address);
- d. details about who you would like us to consider paying benefits to if you die; and
- e. if you are a member of the defined contribution ("DC") section or have paid additional voluntary contributions to one or both of the Funds, your choice of fund for investing your contributions.

2.2 What information may we collect from other sources (such as the sponsoring employers of the Funds)?

These are examples of categories of information we may collect from other sources:

- a. personal details (for example, your name, gender and date of birth);

- b. our contact details (for example, your address, phone number and email address); and
- c. information necessary to calculate and pay your benefits (for example, your employment history and salary).

2.3 How will we use your personal information and why?

The ways we use your information include:

- a. identifying you and your dependants and making sure your details are up to date;
- b. communicating with you;
- c. calculating and paying your benefits and any benefits payable to your dependants;
- d. making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death;
- e. calculating the actuarial liabilities of the Funds; and
- f. if you are a member of the DC section or have paid additional voluntary contributions to one or both of the Funds, we may use your information to decide how to invest assets allocated to your account.

2.4 Legal basis for using your personal information

We must have a legal reason to use your personal information. This will usually be one of the following:

- a. to fulfil our legal obligations, such as giving you specified information about your benefits as required by pension legislation;
- b. to meet our legitimate interests to administer the Funds efficiently and to pay benefits to you and your dependants in accordance with the relevant Funds' rules;
- c. because we need to use the information to fulfil our obligations (for example, to pay ill health pensions or benefits after your death) and our use of the information is authorised by law;
- d. to meet the sponsoring employers' legitimate interests in managing and funding liabilities in the Funds; and
- e. because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health, we may ask for your consent to process your data. Where this applies, you may take back your consent at any time by contacting us.

3 **INFORMATION SHARING**

3.1 We may share personal information with:

- a. the Funds' in-house pensions team, payroll providers and our advisers (such as the Actuary to the Funds, our auditors and our legal advisers) and their sub-contractors to facilitate the administration of the Funds and your benefits;
- b. other medical advisers where you have requested an ill health pension;
- c. His Majesty's Revenue and Customs (HMRC) and other government organisations, including, but not limited to, the Pensions Regulator, the Pensions Ombudsman and the Pension Protection Fund;

- d. insurance companies, reinsurance companies and their advisers with a view to investing in or securing benefits through long-term insurance policies;
- e. insurance brokers in connection with the Trustee's insurance;
- f. the providers of funds in which members of the Thomson-Leng Provident Fund with benefits in the DC section, or members of both Funds with additional voluntary contributions, can choose to invest;
- g. independent financial advisers to enable them to advise on your benefits in the relevant Fund;
- h. companies which specialise in helping pension schemes to communicate with members about their benefits; and
- i. providers of pensions dashboard services (including the Money and Pensions Service, the Pensions Dashboards Programme, dashboard providers themselves, and any service providers appointed by us or by the Funds' administrators) to facilitate your ability to access information regarding your benefits under the Funds via pensions dashboards.
- j. We may also provide some of your personal information to the sponsoring employers and their advisers to help them to make decisions relevant to their role as the sponsoring employers of the Funds. We will only do so to the extent we consider necessary for these purposes.
- k. The Trustee acting in its capacity as trustee of the Thomson-Leng Provident Fund has entered into a long-term insurance policy with The Prudential Assurance Company Limited ("Prudential UK") to insure members defined benefits. The Trustee will need to share with Prudential UK personal information for the purposes of, and in accordance with the terms of, the insurance policy. The Trustee will share such information with Prudential UK in accordance with Data Protection laws. For information about how Prudential UK will use your personal information, please see Prudential UK's privacy notice here: <https://www.mandg.com/dam/pru/shared/documents/en/genm877302.pdf>

4 SECURITY AND STORAGE

- 4.1 We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.
- 4.2 When sharing your personal information with third parties we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.
- 4.3 We will keep your personal information for as long as we have a relationship with you or your dependants. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

5 YOUR RIGHTS

You have rights regarding your personal information as follows:

Right of access – you have the right to request information about the processing of your personal information, see personal information 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 information we hold about you is inaccurate or wrong, you can ask to have it corrected.

Right to restrict processing – you can require the Trustee to restrict or limit the processing of your personal information 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 information being processed, although the Trustee can override this objection in specific instances.

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

Right to be forgotten – you can request that your personal information is deleted altogether, although the Trustee can override this request in certain circumstances.

Right to complain – you have the right to complain to the Information Commissioner’s Office if your personal information rights are not complied with. See “How to contact us” for the Information Commissioner’s Office’s contact details.

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

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

6 **INTERNATIONAL DATA TRANSFER**

Where your personal information is to be transferred outside the UK (for example by one of our advisors) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

7 **CHANGES TO THIS POLICY**

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are either notified to members or posted on the D.C. Thomson & Co Limited website.

8 **HOW TO CONTACT US**

8.1 The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns, please contact:

David Armstrong, Secretary to the Trustee Board
Email: diarmstrong@dcthomson.co.uk and Pensions@dcthomson.co.uk
Address: Courier Building, 2 Albert Square, Dundee, DD1 9QJ

8.2 If you have concerns about how we use your personal data, you may submit a complaint using our data privacy complaint form on the Pension Fund Information page on the DC Thomson & Co Limited company website. We will acknowledge and investigate complaints in accordance with applicable data protection law. You also have the right to complain to the Information Commissioner’s Office.

8.3 You can contact the Information Commissioner's Office at www.ico.org.uk or by calling their helpline on 0303 123 1113.

8.4 We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.