

## IET Superannuation and Assurance Scheme

### Data privacy notice

#### Trustees' commitment to your privacy

The Trustees are committed to protecting and respecting your privacy and rights. This Privacy Notice ("**Notice**") gives you information about how the Trustees will collect and use personal data about you, the circumstances in which they may share or otherwise use the personal data and to whom they may disclose this personal data.

The Trustees are data controllers in respect of the personal data they collect about you for the purposes of data protection legislation (by which we mean the UK Data Protection Act 2018 and the EU General Data Protection Regulation (EU Regulation 2016/679) ("**GDPR**") and the GDPR as it forms part of the laws of England and Wales ("**UK GDPR**"). The Trustees' address is Savoy Place, London WC2R 0BL.

We will share your information with the Scheme's administrator and professional advisers, as set out in more detail in this Notice.

The Scheme's administrator is currently Hymans Robertson LLP. When providing administration services to the Scheme, Hymans acts as a data processor and processes member data on behalf of the Trustees.

Hymans Robertson LLP also provides actuarial and consultancy services, including advice and analytics to the Trustees of the Scheme, including through the Scheme Actuary. When providing actuarial services, the Scheme Actuary and Hymans act as joint data controllers with the Trustees. For more information on these roles, please visit: <https://www.hymans.co.uk/scheme-member-privacy-notice>.

The Trustees hold two bulk annuity policies, each issued by a different insurer, Just and Pension Insurance Corporation ("**PIC**"). Each policy relates to a different group of pensioner members of the Scheme. Just and PIC are data controllers in respect of the personal data of the relevant members, who will also receive the insurer's own privacy notice.

#### Information the Trustees may collect from you

The Trustees may collect, hold, and use (process) personal data which you provide to them in connection with the Scheme. This may include data about your age, date of birth, identification documents, national insurance number, gender and marital status. Also included may be your length of employment with the Institution of Engineering and Technology ("**IET**") group and details of your dependants and other persons in your household, and your contact details (e.g. residential address, email address and telephone number).

In addition, we may collect, hold and use personal data about you that are of a sensitive nature ("**Sensitive Personal Data**") such as medical information about you.

Where you have provided the Trustees with personal data about other individuals such as family members, dependants (including children), or other potential beneficiaries under the Scheme, those individuals should be made aware of the information in this notice.

#### Information the Trustees may collect about you from the IET group or third parties

The Trustees may collect personal data about you from the IET group or third parties. This may include information relating to your employment, your salary and your benefits, to the extent relevant to your pension and related arrangements. Periodically, the Trustees may collect personal data relating to you from third parties such as former employers or regulatory authorities.

#### Purposes for which, and the basis upon which, the Trustees will process your personal data

The purposes for which we may process personal data, and the legal basis on which we may perform such processing, are set out in the table below:

Processing purpose	Types of personal data	Legal basis for processing
Administering the Scheme in accordance with its Trust Deed and Rules and applicable law	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in administering the Scheme in accordance with its governing documents and applicable law
Determining your eligibility to receive benefits under the Scheme	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• financial information</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ol style="list-style-type: none"> <li>a. National Insurance number</li> <li>b. payroll records and tax status information</li> <li>c. information relating to your employment, salary, contributions and benefits</li> <li>d. other relevant information provided to us</li> </ol>	We have a <b>legitimate interest</b> in determining whether you are eligible for receiving benefits under the Scheme
Determining the benefits payable to and in respect of you and paying the correct benefits on time to the correct recipient	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• financial information</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ol style="list-style-type: none"> <li>a. National Insurance number</li> <li>b. payroll records and tax status information</li> <li>c. information relating to your employment, salary, contributions and benefits</li> <li>d. other relevant information provided to us</li> </ol>	We have a <b>legitimate interest</b> in paying the correct benefits on time to the correct recipient in accordance with the Trust Deed and Rules of the Scheme

Processing purpose	Types of personal data	Legal basis for processing
Communicating with you about the Scheme and your benefits	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ol style="list-style-type: none"> <li>a. National Insurance number</li> <li>b. payroll records and tax status information</li> <li>c. information relating to your employment, salary, contributions and benefits</li> <li>d. other relevant information provided to us</li> </ol>	We have a <b>legitimate interest</b> in communicating with you about the Scheme and your benefits
Establishing, exercising and defending our legal rights	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ol style="list-style-type: none"> <li>a. National Insurance number</li> <li>b. payroll records and tax status information</li> <li>c. information relating to your employment, salary, contributions and benefits</li> <li>d. other relevant information provided to us</li> </ol>	We have a <b>legitimate interest</b> in establishing, exercising and defending our legal rights
For audit, compliance and other risk management	<p>Information provided by you:</p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p>Information provided by employers and third parties:</p> <ol style="list-style-type: none"> <li>a. National Insurance number</li> <li>b. payroll records and tax status information</li> <li>c. information relating to your employment, salary, contributions and benefits</li> <li>d. other relevant information provided to us</li> </ol>	We have a <b>legitimate interest</b> in auditing the Scheme and Scheme data and ensuring that it is managed properly

Processing purpose	Types of personal data	Legal basis for processing
Considering any potential beneficiaries of death benefits under the Scheme	Personal data of potential beneficiaries: <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• marital status</li> <li>• bank account details</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in determining the beneficiaries of your death benefits under the Scheme
Determining whether an individual who submitted a request to locate their pensions information (a “ <b>Find Request</b> ”) is a match to the Scheme’s records	Information provided by you: <ul style="list-style-type: none"> <li>• name and previous name(s)</li> <li>• address and previous address(es)</li> <li>• date of birth</li> <li>• National Insurance number</li> <li>• contact details such as email address and phone numbers</li> <li>• employer name and details of your employment</li> <li>• other relevant information provided to us (including which we may request in order to identify if you have benefits under the Scheme).</li> </ul> Information relating to a Find Request may also be received from the Money and Pensions Service. Where you have submitted a Find Request, we will record whether you are a full or partial match to our records, and may share this with the Money and Pensions Service so that an individual knows that we have matched them with a pension record.	We have a <b>legal obligation</b> to provide pensions dashboards services
Allowing individuals to access or view their pensions dashboard.	The data that may be accessible through a pensions dashboard is: <ul style="list-style-type: none"> <li>• Administrative data - such as scheme name, types of benefit provided, date of birth, category of membership, when a member joined and, if available, start and end dates of pensionable service, and employer’s name.</li> <li>• Value data - details of how much pension (or other benefits) an individual has built up already and, for active members of the Scheme, how much they may have when they retire.</li> <li>• Contextual information – this is provided such as the date as at which the pension and benefits are worked out and the date from which they are payable, whether pensions and benefits for survivors are included, and whether pensions may increase.</li> </ul>	We have a <b>legal obligation</b> to provide pensions dashboards services

We may also process special category data for the following purposes and under the following legal bases:

Processing purpose	Types of Sensitive Personal Data	Legal basis and special condition for processing
Considering your eligibility to receive benefits early on grounds of ill-health	health information	Your <b>explicit consent</b> to process your health data
Considering the eligibility of any potential beneficiaries to receive death benefits	health information	The beneficiaries <b>explicit consent</b> to process their health data, or the <b>explicit consent</b> of a holder of parental responsibility over the beneficiary (if they are a child)

Where the Trustees are required to process special category data, it will approach the relevant member for specific consent to the processing of such data.

The Trustees will also process personal data to fulfil legal obligations to which they are subject.

## **Retention of personal data**

The Trustees will hold personal data of Scheme members and their dependants for as long as may be necessary in order to administer benefit entitlements and for the purposes of maintaining records of steps the Trustees have taken to comply with their obligations under the Scheme. Inevitably, this means that personal data may be retained by the Trustees for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased. To determine the appropriate retention period, the Trustees consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, and whether we can achieve the purpose of the processing through other means. The end date for holding data in respect of a particular member is expected to be 75 years from the date on which the last payment is made to or in respect of that member.

## **Disclosure of personal data**

In the course of administering the Scheme, the Trustees may share your personal data with the following categories of recipient:

- The administrator (currently, Hymans Robertson) who is responsible for the day-to-day administration of the Scheme, and is also responsible for providing services in relation to pensions dashboards (together with other IT service providers).
- Tracing agencies and consultants who assist with updating Scheme data or providing statistical information.
- Providers of IT services and other third parties who assist with the day-to-day administration of the Scheme.

We will also transfer personal data to other categories of recipients, who will be directly responsible under data protection law for protecting the personal data as controllers, including:

- The Trustees' actuary, for the purpose of providing actuarial services to the Trustees.
- The Trustees' legal adviser, (currently, Mayer Brown International LLP), for the purpose of providing legal advice to the Trustees.
- Other professional advisors to the Trustees, such as auditors or accountants.
- The Pensions Regulator, the Pensions Ombudsman, Courts and HMRC
- The Money and Pensions Service, and third party providers of pensions dashboards services.
- The Trustees may also disclose your personal data to other third parties such as insurers, reinsurers and other advisers, for example as part of a special project under which benefits are protected through an insurance product.

At all times, the Trustees will ensure that the personal data is processed in accordance with their instructions and in circumstances which require the recipient to observe industry standard security measures in respect of the personal data.

The Trustees may also disclose your personal information to third parties in the following types of situations:

1. in the event that they wish to enter a buy-out/buy-in of any of the benefits under the Scheme, in which case they may disclose your personal data to the prospective counterparty to such a transaction; or
2. if they are under a duty to disclose or share your personal data in order to comply with any legal obligation.

The Trustees will not disclose or transfer personal data to third parties for the purposes of marketing.

## **International transfers of personal data**

As required by data protection legislation, the Trustees have strict security procedures regarding the storage and disclosure of personal data. The personal data that they collect about you may be transferred to, and stored at, or processed in, one or more countries outside the UK which has not yet been deemed by the UK Government to offer adequate data protection. It may also be processed by staff operating outside the UK who work for the Trustees or for our third parties. In such cases, the Trustees will take steps to ensure an adequate level of data protection in the country of the recipient as required under the UK GDPR. If the Trustees decide that personal data does need to be transferred to a country outside the UK which does not offer adequate protection, the Trustees will notify you in writing and ensure that appropriate technical and organisational measures are put in place so that such processing meets the requirements of the data protection legislation. If the Trustees cannot ensure such an adequate level of data protection, your personal data will not be transferred outside the UK.

## **Automated decision-making**

The Trustees do not envisage that any decisions will be taken about you using automated means. In the event that this position changes, we will notify you in writing.

## **Your rights under the UK General Data Protection Regulation**

In certain circumstances, under the UK GDPR you will have the right to:

- Request access to your personal data. This right always applies. However, there are some exemptions which mean you may not always receive all of your personal data that we process;
- Request rectification of your personal data if it is inaccurate or incomplete. This right always applies;
- Request deletion of your personal data in certain circumstances if there is no legitimate reason for its continued processing;
- Restrict the processing of your personal data in certain circumstances (for example, if you want the Trustees to establish its accuracy or the reason for processing it);
- Object to the processing of your personal data where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing);
- Request the transfer of your personal data which you have given to us to another party. This right only applies where we rely on your consent to process your personal data; and
- Withdraw your consent to processing at any time, in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. Once the Trustees have received notification that you have withdrawn your consent, they will no longer process your information for the purpose or purposes you originally agreed to, unless they have another legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal.

However, if you ask the Trustees to erase or stop processing your personal data, they may be unable to properly administer the Scheme or process any benefits for you, and if they have compelling legal grounds to continue to process your personal data, they may continue to do so.

You may address your requests to the Scheme's administrator, Hymans Robertson LLP:

Postal address: 45 Church Street, Birmingham B3 2RT

Email: [iet@hymans.co.uk](mailto:iet@hymans.co.uk)

Telephone: 0121 212 8144

You also have the right to make a complaint about the handling of your personal data (or the personal data of someone on whose behalf you are acting) through our Data Protection Complaints Procedure. If you wish to make such a complaint, please contact Hymans Robertson LLP using the contact details above. We will acknowledge your complaint within 30 days and will keep you informed while it is being investigated.

## Changes to this Notice

The Trustees reserve the right to change this Notice and any other relevant policies or procedures at any time without notice to you. Any changes we may make to this Notice in the future will be notified to you and you are advised to regularly check and review the Notice to ensure you understand how we may be processing your personal data. Any changes the Trustees may make to this Notice (which will, unless otherwise indicated, apply to any personal data already obtained by the Trustees before the changes were made) will be effective from the date on which those changes have been notified to you. Where appropriate, they may also notify you of any changes made by e-mail.

## Contact

If you have any questions concerning this Notice or the policies or procedures referred to above, please contact the Trustees via the Scheme's Administrator, Hymans Robertson LLP:

Postal address: 45 Church Street, Birmingham B3 2RT

Email: [iet@hymans.co.uk](mailto:iet@hymans.co.uk)

Telephone: 0121 212 8144

Where you are dissatisfied with any aspect of our handling of your personal data you have a right to lodge a complaint with the Information Commissioner's Office. Their contact details are:

Address: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9  
5AF  
Tel: 0303 123 1113 or 01625 545 745  
Fax: 01625 524 510  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)