

Affinity Water Pension Trustees Limited (“the Trustee”) is responsible for the administration of the Affinity Water Pension Plan (“the Plan”). You and your employer will provide us with personal information about you (and any beneficiary if applicable) when you join the Plan through autoenrolment or by completing an Application Form.

Further personal information, such as details of your pay and service, will also be provided to the Trustee by your employer during your membership. We are required to comply with the General Data Protection Regulations 2018 (“GDPR”) and all data protection legislation in effect in England and Wales* in respect of this personal information.

Data must be processed lawfully, fairly and transparently

What information do we hold and use?

The Trustee collects and processes the following types of personal data in order to administer the Plan:

- Personal, for example name, date of birth, address, sex and marital status (including details of any divorce settlement relevant to your benefits);
- Employment, for example national insurance number, details of employer, salary details, employment dates, details of service breaks;
- Any information you have provided about who you would like to receive any benefits due on your death, including personal relationships;
- Bank details, for example so pension benefits can be paid; and
- Limited health information to assess eligibility for certain Plan benefits.

Data must be collected for specific, explicit and legitimate purposes

On what grounds do we use your information?

The Trustee:

- has a legitimate interest to hold your data to enable the Plan to be properly administered for you and all Plan members and beneficiaries;
- has a legal obligation to provide individual members with certain information under pension regulations**; and
- may rely on your consent in very limited circumstances, for example when we obtain explicit consent to use special or sensitive categories of personal data (see Key Terms).

Data must be adequate, relevant and limited to what is necessary

Most of the personal data we collect and process is provided by either your employer or you, and is normally necessary to meet the legal requirements of a pension scheme. In addition, Hymans Robertson LLP, which administers the Plan on our behalf, may have obtained information from you and passed it to us. We may also get information from other sources, for example from another scheme if you have transferred benefits from that scheme, from government departments such as HMRC, and from publicly accessible sources (e.g. the electoral roll) if the Trustee is trying to locate you.

Why do we collect this information?

We must by law provide benefits in accordance with the Plan’s governing documentation and must also meet other legal requirements in relation to the running of the Plan. We also have a legitimate interest in properly administering the Plan. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Plan governance are met (including standards set out in Pensions Regulator guidance). We will use your personal information to comply with these obligations and communicate with you as a member, to establish and defend our legal rights and to prevent and detect crimes such as fraud.

We will only process data where it is relevant and necessary. When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent, and we will do so where that is necessary to run the Plan in a sensible way. Where any data collected is not mandatory and is provided to us on a voluntary basis, we will inform you that you have a choice as to whether to provide this. This may affect what we can do for you, unless we have another lawful reason for using your information.

Pension scheme administration is a highly complex process and it is not possible to describe all that is involved here, but if you have any questions about the uses to which this information may be put, please contact the Plan administrators, Hymans Robertson LLP (“Hymans”) as shown below.

Who do we share your information with?

We will share your information with the Plan’s administrators and professional advisors. When providing administration services to the Plan, Hymans acts as a data processor and processes member data on behalf of the Trustee.

Hymans also provides actuarial, investment and consultancy services, such as advice and analytics, to the Trustee, including through the Scheme Actuary. When providing actuarial services, the Scheme Actuary and Hymans act as joint data controllers with the Trustee. For more information on these roles, please visit:

https://www.hymans.co.uk/media/uploads/How_Hymans_Robertson_uses_your_personal_data.pdf

Your data will also be shared with Club Vita LLP, who provide longevity (life expectancy) analytics and related information to help us manage the Plan’s liabilities. Hymans (and Club Vita LLP) may appoint service providers or sub-processors to help in the provision of their services. For details, please visit:

www.hymans.co.uk/information/trust-centre

The table below explains the reasons for sharing your data with the Plan’s advisers. We may also share your data with other Plan advisers not listed below where it is necessary for us to properly administer your benefits under the Plan. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

Type of service/adviser	Name	Reasons for sharing data
Scheme Actuary and Administrators	Hymans Robertson	To calculate the value of the Plan’s assets and liabilities, to set employer contribution rates and to facilitate the creation and maintenance of individual member’s pension payments.
Regulatory Bodies	The Pensions Regulator	To ensure the Plan is properly governed and that members’ funds are protected
	HMRC	To enable the Trustee to meet all HMRC regulations and to check compliance with maximum benefit limits or in connection with any transfer of entitlements to or from such an arrangement
Auditors	KPMG	To provide an external audit of data quality and integrity to comply with legislation on the accuracy of member data
Member Communications	Hymans Robertson	To facilitate the print and delivery of, for example, annual Benefit Statements, Guided Outcome statements
Transfers out of the Plan	Another pension provider	To effect the transfer out of the Plan to another pension scheme once a member has stopped working for a Plan employer, which may include the transfer of employment of members under TUPE

Some of the people mentioned above just use your personal information in accordance with our instructions. However, others may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from any of the people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Company Secretary and we will put you in touch with them.

Data must only be kept for as long as necessary

How long do we store your information?

Data will be kept for your lifetime plus 20 years (or the lifetime of your beneficiary plus 20 years where relevant). This will allow the Trustee to assist you (and your beneficiary) to answer any queries or complaints.

Data must be kept secure

How is your data kept safe?

The Trustee's policy is that personal data will be securely archived, accessible only by a restricted group of authorised persons. We will also comply with our Data Protection policy published on [pensionsWEB](#). Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

Data must be accurate

What rights do you have?

You have rights to control the information held about you and how it is used. These rights depend upon the grounds upon which your information is collected.

The right of access

You are entitled to see the information we hold about you and can request a copy from the Company Secretary (contact details below).

The right to rectification

If you believe any information we hold about you is incorrect, please email the Company Secretary at pensiontrustee@affinitywater.co.uk and we will amend the information accordingly.

The right to erasure/ right to be forgotten

You have the right to request the erasure of your personal information, in particular circumstances. Should you wish to discuss this further, please email the Company Secretary.

*The right to restrict processing****

You have the right to request that we restrict how we use your personal data if you have a particular reason for wanting the restriction. Should you wish the Plan to limit how we use your data please email the Company Secretary.

*The right to data portability*****

You have the right to obtain and reuse personal data that you have supplied, for your own purposes. You can move, copy or transfer personal data from our IT environment to another in a safe and secure way. Should you wish to transfer your data please email the Company Secretary.

The right to object

You have a right to object to the use of your data for certain actions. For example, you can object to the Plan sharing your data with third parties. Should you exercise your right to object, we will take appropriate steps to ensure your request is complied with. However, it might not limit the information you receive from the Plan, as we are required by law to provide you with certain information or supply certain services.

Where can I find out more?

If you want to know more about how the Trustee uses your information or your rights, or you have a concern about the way we are collecting or using your personal data, please contact the Company Secretary.

Alternatively, you can contact the Information Commissioner's Office at www.ico.org.uk or call its helpline on 0303 123 1113. The Trustee is registered as a data controller with the Information Commissioner's Office and our registration number Z3603204.

Affinity Water Pension Trustees Limited	c/o Company Secretary
Tamblin Way, Hatfield AL10 9EZ	pensiontrustee@affinitywater.co.uk
Member website: pensionsWEB	www.affinitywaterpensions.co.uk
Hymans Robertson LLP	affinity@hymans.co.uk
One London Wall, London EC2Y 5EA	0207 082 6182

And finally ...

KEY TERMS

Beneficiary	if you receive benefits from the Plan, such as a pension or a lump sum, you are a beneficiary
Data Controller	a person who decides how and why data is processed
Data Protection Policy	a policy adopted by the Trustee setting out how we comply with all relevant elements of GDPR and general data protection law
Data Subject	an identifiable living human being
Filing System	any structured set of personal data which are accessible according to specific criteria
GDPR	the General Data Protection Regulations
ICO	the Information Commissioner's Office, responsible for enforcement of GDPR in the UK
Personal Data	any information relating to a Data Subject
Privacy Notice	information which must be given to Data Subjects about the processing of their personal data
Processing Data	includes collecting, storing, recording, organising, altering, using, disclosing and erasing personal data
Special or 'sensitive' Data	personal data concerning the Data Subject's race, ethnicity, political opinions, religion, trade union membership, sex life, sexual orientation, genetic or biometric data, or criminal convictions where they are relevant to the payment of Plan benefits

FURTHER INFORMATION

*** Data Protection Requirements (the “DPR”)**

DPR means the Data Protection Act 1998 (or The Data Protection Act 2018), the EU Data Protection Directive 95/46/EC, the Regulation of Investigatory Powers Act 2000, the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (SI 2000/2699), the Electronic Communications Data Protection Directive 2002/58/EC, the Privacy and Electronic Communications (EC Directive) Regulations 2003, the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011, the General Data Protection Regulation (from 25 May 2018) and all other applicable laws and regulations relating to processing of personal data and privacy in any applicable jurisdiction as amended and replaced, including where applicable the guidance and codes of practice issued by the UK Information Commissioner or such other relevant data protection authority.

**** Pension regulations**

Pension regulations include, but are not limited to:

- The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013;
- The Pensions Act 2011 (Transitional, Consequential and Supplementary Provisions) Regulations 2014;
- The Occupational and Personal Pension Schemes (Disclosure of Information) Amendment Regulations 2015.

***** When does the right to restrict processing apply?**

As a member of the Plan you have the right to request restricting the processing of personal data (held by the Trustee) in the following circumstances:

- If you contest the accuracy of your personal data;
- if your data has been unlawfully processed, you can request restriction rather than erasure;
- where we no longer need your personal data you can request it is kept to establish, exercise or defend a legal claim; or
- if you object to the Trustee processing your data then, while we consider the objection, your personal data held will be restricted until legitimate grounds to hold the data can be established.

Note that as a matter of good practice, the Trustee will automatically restrict the processing of personal data whilst considering any challenge on accuracy (“the right to rectification”) and any objection raised (“the right to object”).

****** The right to data portability**

Please note that the right to data portability only applies:

- to personal data you have provided to the data controller;
- where processing is based on your individual consent or for the performance of a contract; and
- when processing is carried out by automated means.