

# HERMES GROUP PENSION SCHEME (HGPS)

## Privacy Statement

### The General Data Protection Regulation (GDPR) 2018

#### Introduction

Hermes Pension Trustees Limited is the trustee of HGPS.

We gather, hold and use personal information (also known as personal data) relating to members and former members of HGPS their family and dependants. Below when we refer to “you” we are also referring to your family and any dependants. We are committed to protecting, keeping secure and processing fairly and lawfully the personal information we gather, hold and use. This Privacy Notice explains how we do this.

We will amend this Privacy Notice from time to time to keep it up to date.

We are a data 'controller' of the personal information we gather, hold and use as we decide the purposes for and how that personal information is processed.

#### The personal data we use

Depending on a person's circumstances at the time we may use some or all the following personal data:

*name (including former names), date of birth, gender, relationship status, postal address (and former addresses), telephone number (s), email address, Cookie id, IP address, national insurance number, employee and/or scheme number, tax details, details of bank account for the purpose of paying benefits, relevant employment information (including current and past salary information, employment records, details about pension benefits and where you have an AVCs pension pot relevant details including investment choices, contribution history and your intended retirement date.*

#### How we collect and use your personal data

The personal data we collect about you is provided from many sources such as from you, your current or former HGPS employer, public bodies such as HMRC, public databases such as the Register of Births, Deaths and Marriages, schemes from which transfers into HGPS have been made, persons instructed by you to provide us with information and our advisers.

We have a legal obligation and legitimate interest to collect, use, process and retain your personal data for the administration, operation and investment of your HGPS benefits including, but not limited to, the following purposes:

- investment decisions;
- paying pension and other benefits;
- communication of information;

- record keeping;
- to comply with legal and regulatory requirements;
- prevention and detection of crime (including, but not limited to, theft, fraud and terrorism);
- for internal statistical, financial modelling and reference purposes and so we can monitor HGPS liabilities;
- system access and security.

As noted above we also collect personal data about your family and dependants and you should make them aware of this.

If information about your health or sexual orientation is processed further legal grounds apply. These are that your explicit consent is needed, you have made that information manifestly public or the information is required to establish, exercise or defend legal claims.

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we obtain your consent.

### **To whom we may disclose your personal data**

Your personal data will be shared by the HGPS Trustee Board with trusted third parties only where it is appropriate to so including:

- professional advisers, third party service providers or agents providing services to us, for example actuaries, auditors, lawyers, medical advisors, investment advisers and administrators;
- organisations to whom personal data is sent to effect benefit payments whether in the UK or overseas;
- personnel at any of the current or former employers both for administration purposes and so that the employers can monitor their liabilities to HGPS
- any person to whom disclosure is allowed or required by law and/or regulation;
- any court, tribunal, regulatory authority or governmental entity with authority over us;
- any insurer, investment provider, pension scheme operator or insurance broker in connection with providing benefits under HGPS;
- third parties at your request or with your consent;
- tracing bureaus used for mortality screening or tracing beneficiaries.

Some of the organisations referred to above will simply process your personal data on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal data that we share with them.

The above disclosures may require the transfer, storage or processing of your personal data in a location outside the United Kingdom which may not have equivalent privacy or data protection laws. However, regardless of where your personal data is held, we will take the steps we can to ensure that it is treated confidentially and securely.

## **How we protect your personal data**

The HGPS Trustee Board is committed to keeping your personal data confidential and secure. We will use appropriate procedures and security features to process and protect your information as will the third parties we engage for the purposes of HGPS.

## **Retaining your personal data**

Your personal data is retained by us for as long as the purpose for which it was collected continues, or to comply with legal, regulatory or accounting requirements.

## **Your rights and how to contact us**

You have the right to request access to a copy of the information we hold about you and to have it corrected where appropriate.

You can obtain a copy of your data by contacting XPS:

HGPS@xpsgroup.com

0131 370 2601

XPS Administration, 3rd Floor, West Wing, 40 Torphichen Street, Edinburgh EH3 8JB

You may be asked for evidence of your identity. Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances. Please note that we can in some circumstances refuse to act on requests.

**Changes to your personal data** - please ensure that your personal data is up to date always. You can ask us to change or complete any inaccurate or incomplete personal information held about you.

**Erasure** - you can ask us to delete your personal information where it is no longer necessary for us to use it or where we have no lawful basis for keeping it

**Restriction** - you can ask us to restrict the personal information we use about you in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.

Please note that your request to restrict processing or to erase your data can be overridden in certain circumstances.

**Make a complaint** - 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. The details for the ICO's website are [ico.org.uk](http://ico.org.uk).

**Hermes Pension Trustees Limited as Trustee of the Hermes Group Pension Scheme**

**August 2020**