

## Privacy Notice under the General Data Protection Regulation (GDPR)

### Who we are

Royal Mail Pensions Trustees Limited is the trustee ("the Trustee") of the Royal Mail Pension Plan ("the RMPP").

As the Trustee, we hold certain personal information (known as "personal data") about members and, where applicable, their dependants and potential or actual beneficiaries. Most of the information held about you and processed by the Trustee in running the RMPP will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

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

The RMPP is, because of its history, closely linked to the Royal Mail Statutory Pension Scheme (the "**RMSPS**"), which is managed by the Cabinet Office. To find out how your personal data is held and protected in the RMSPS, you can write to: Head of RMSPS, Cabinet Office, 1 Horse Guards Road, London SW1A 2HQ.

### 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 gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or potential or actual beneficiaries (including their names and possibly details of their gender)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits

- medical and other details about your health (particularly if you have applied to have your benefits paid early on health grounds)
- where you have chosen to pay union membership fees from your pension payments, the union of which you are a member.

In order to properly administer the RMPP and to calculate and pay benefits, from time to time we may also need to hold other information about you.

### **How we use that information**

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the RMPP 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 RMPP governing documents, as well as under relevant legislation.

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the RMPP, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death. We will not collect any personal data that we do not need.

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

As part of running the RMPP, 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 data protection 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 Trustee needs help from various advisers to properly administer the RMPP, we share personal data with the following:

- your current, past or future employer which may include group companies which are based outside the European Economic Area (EEA)<sup>1</sup>. Where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure. We may occasionally send your personal data outside the EEA in order for

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<sup>1</sup> The EEA includes European Union countries and also Iceland, Liechtenstein and Norway.

us to process pension transfer requests. Where that's the case, we will obtain your consent before any transfer of data is made.

- the Trustee Executive team (employees of Royal Mail Group who support the work of the Trustee)
- the RMPP's professional advisers, including the actuary, auditor, medical advisers, investment adviser and lawyers
- the Pensions Service Centre, who are responsible for the day-to-day administration of the RMPP on behalf of the Trustee
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement
- our appointed insurance company or companies – including (but not limited to) any company appointed for the purposes of buy-ins, buy-outs, life insurance and additional voluntary contributions (AVCs)
- 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 Bank of New York Mellon, when pensions are being paid overseas
- our appointed beneficiary and mortality tracing agencies where we need to trace missing members or beneficiaries or to confirm existence/entitlement to benefits
- other pension schemes, particularly if you ask us to transfer your RMPP benefits to another scheme
- the Cabinet Office (in connection with benefits you may have with the RMSPS for service before 1 April 2012).

### **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 example, details about the date a member joins the RMPP, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life.

However, we review the personal data held in relation to the RMPP on a regular basis in accordance with our data retention schedule. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

## 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, you can ask to have it corrected.
- **Right to Restrict Processing** – you can require the Trustee 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 Trustee 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 Trustee 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 Trustee 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 RMPP, 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.

## 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 this privacy notice
- make a complaint about how we have handled your personal data

please contact the Pensions Service Centre by emailing [pensions.helpline@royalmail.com](mailto:pensions.helpline@royalmail.com), by phoning 0114 241 4545, or by writing to Pensions Service Centre, PO Box 5863, Pond Street, Sheffield S98 6AB.

## 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 and their website is [www.ico.org.uk](http://www.ico.org.uk).

**Updates to this notice**

This notice is the latest version as at September 2019. This notice will be updated from time to time and you can see the current version at any time on this website. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see “Who to contact” above).