The Trustees of the Wilkin Chapman Group Limited Staff Pension Fund

Privacy Notice

1. The Trustees must comply with UK data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and related legislation, each as amended from time to time (together, the **Data Protection Legislation**).

2. For the purposes of the Data Protection Legislation, all members of the Scheme in respect of whom the Trustees hold personal data are "**data subjects**", and the Trustees are a **data controller** for the personal data they hold. The Scheme Actuary is also a data controller and their privacy notice in respect of actuarial services is available at Privacy Notice - broadstone.co.uk.

3. The Trustees must comply with the requirements under the Data Protection Legislation. One of these requirements is for the Trustees to provide you with certain information regarding how your personal data is used and held.

4. The Trustees have not appointed a Data Protection Officer, but can be contacted about any data-protection matter using the details set out in the 'Contact' section at the end of this notice.

5. This notice sets out how the Trustees obtain, use and protect any personal data that is held in respect of you as Trustees of the Scheme, or personal data that is otherwise obtained or generated by the Trustees and which relates to you or to any individual connected with you.

6. The Trustees will process your personal data as described in this notice because this is necessary to comply with their legal obligations in relation to the Scheme, to perform their obligations under the Scheme's governing documentation, and for their legitimate interests in administering and managing the Scheme.

Information the Trustees may collect and use about you

7. Personal information, means any information which could be used to identify you as an individual. This would therefore include any information provided to the Trustees in relation to your actual or potential membership of the Scheme.

8. The Trustees may hold information about you, including, but not limited to, your name, date of birth, contact details, bank details, employment details/status, marital status and

dependants (if relevant). The Trustees may also hold some special personal data about you including information relating to your physical and/or mental health.

9. Some of the personal data that the Trustees process is needed so that you can join and remain a member of the Scheme and so that the Trustees can pay benefits (for example, identification, employment and bank details). If you do not provide this information, or if the Trustees are unable to obtain it, they may not be able to calculate or pay some or all of your benefits or administer the Scheme properly.

10. Most of the personal data the Trustees hold about you is provided by you, your current or former employer or the Scheme administrator. The Trustees may also receive information from other third parties where this is relevant (for example, from HMRC, other pension schemes, financial advisers, dependants or beneficiaries, or medical professionals in connection with ill-health or incapacity cases).

Purposes and legal bases for processing your personal data

11. The Trustees will process your personal data only where there is a lawful basis for doing so under the Data Protection Legislation. In particular, the Trustees will process your personal data for the following purposes and on the following legal bases:

11.1. To administer and operate the Scheme

For example, to keep records of your membership, calculate, pay and correct benefits, keep you informed about your benefits and options, and deal with queries and disputes.

Legal basis for processing:

- processing is necessary for the Trustees to comply with their legal obligations (for example under pensions, tax and trust law); and/or
- processing is necessary for the performance of obligations under the Scheme's governing documentation and related arrangements with you (where applicable); and/or
- processing is necessary for the legitimate interests of the Trustees in properly running and managing the Scheme (for example, Scheme governance, administration and funding).

11.2. To manage Scheme funding, investments and risks

For example, obtaining actuarial advice and valuations, managing investments, monitoring and improving data quality, and carrying out risk management, internal controls, governance and audit.

Legal basis for processing:

- processing is necessary for the Trustees' legitimate interests in ensuring the proper funding, investment and risk management of the Scheme; and
- in some cases, processing is necessary for the Trustees' legal obligations (for example, to obtain and share actuarial valuations or funding information with regulators).

11.3. To comply with legal and regulatory requirements

For example, disclosures to HM Revenue & Customs, the Pensions Regulator, the Pensions Ombudsman, the courts, law enforcement bodies or other public authorities where required, and compliance with anti-money laundering, fraud prevention and sanctions obligations.

Legal basis for processing:

- processing is necessary for the Trustees to comply with their legal obligations; and/or
- processing is necessary for the legitimate interests of the Trustees and the Scheme in preventing and detecting fraud or other unlawful acts.

11.4. To deal with disputes, complaints and legal claims

For example, handling member complaints or appeals, defending or pursuing legal claims, and responding to regulatory investigations.

Legal basis for processing:

- processing is necessary for the legitimate interests of the Trustees in establishing, exercising or defending legal claims; and/or
- processing is necessary for the Trustees' legal obligations.

11.5. To communicate with you and your beneficiaries

For example, sending benefit statements, announcements and other information about the Scheme and about changes to law or Scheme rules that may affect your benefits.

Legal basis for processing:

- processing is necessary for the Trustees' legitimate interests in keeping members and beneficiaries informed and in administering the Scheme; and/or
- processing is necessary for the performance of obligations under the Scheme's governing documentation.

11.6. Special category data (including health information)

Where the Trustees need to process information about your health or other special category data (for example, to determine eligibility for ill health benefits or to consider discretionary decisions), they will do so only where an additional legal condition is met. This may include:

- processing that is necessary for the purposes of employment, social security and social protection;
- processing that is necessary for the establishment, exercise or defence of legal claims;
- processing that is necessary for reasons of substantial public interest; and/or
- in limited cases, processing based on your explicit consent.

12. Where explicit consent is relied on, you may withdraw that consent at any time (see "Your rights" below), but this may affect the Trustees' ability to provide certain benefits or make certain decisions.

Recognised and clarified legitimate interests

13. The Data Protection Legislation may specify certain "recognised legitimate interests" (for example, preventing crime, safeguarding physical or mental well-being of vulnerable individuals, requests for information to be disclosed from public authorities in relation to public interest requests or to ensure the security of IT systems used for personal data).

Where the Trustees rely on such recognised legitimate interests, they will do so only where the relevant conditions in the Data Protection Legislation are met and will assess your rights (as data subjects) where required.

Automated systems and profiling

14. The Trustees may use automated systems and profiling to assist in administration of the Scheme (for example, to calculate benefits or produce benefit statements). The Trustees do not currently make decisions about you that are based solely on automated processing and which have legal or similarly significant effects without appropriate safeguards. If this changes in future, the Trustees will comply with the relevant legal requirements and will update this notice and explain your rights in relation to such automated decisions.

Who the Trustees may share personal data with

15. The Trustees may share or disclose your personal data with:

    15.1. the Scheme's administrators;

    15.2. the sponsoring employer of the Scheme, Wilkin Chapman Group Limited;

    15.3. the Trustees' service providers, professional advisors (including the Scheme actuary and legal advisers) and auditors;

    15.4. regulators and public authorities (such as the Pensions Regulator, HMRC and the Information Commissioner's Office), where required by law; and

    15.5. any other recipients as may be necessary or desirable to administer the Scheme and/or comply with contractual or legal obligations relating to it.

16. The Trustees have measures in place to protect your personal data and when sharing it with the administrator or other authorised third parties the Trustees will make sure that they, too, have appropriate measures in place to protect your personal data.

17. The Trustees' suppliers have confirmed that they currently process all personal data for the Scheme in the UK. If personal data is transferred outside the UK in future, the Trustees will ensure that appropriate safeguards are in place in accordance with Data Protection Legislation (for example, adequacy regulations, 'data bridges' or approved standard contractual clauses) and will update this notice to explain those safeguards.

How long will your personal data be stored?

18. The Trustees will hold your personal information for as long as is necessary to administer the Scheme and for relevant activities or services although, if necessary, and as required by law, processing of your information may continue after, you have opted out of the Scheme, the cessation of any benefits provided to you by the Trustees, or your death.

19. The Trustees' current data protection policy is that it may retain your personal information for a minimum of 8 years after you or any beneficiary claiming under you has died or obtained your/their full benefits from the Scheme. The Trustees' current data policy is reviewed at least annually and also whenever there are any material changes to legislation, regulation or guidance in respect of data protection.

Your rights in relation to your personal data

20. You have a number of rights under the Data Protection Legislation in relation to the personal data that the Trustees hold about you. These rights may be subject to certain qualifications and exemptions, for example where data must be processed to comply with legal obligations or to protect the rights of others.

21. Subject to those conditions, your rights include:

    21.1. Right of access

    You have the right to obtain confirmation as to whether the Trustees process your personal data and, if so, to receive a copy of that personal data together with certain information about how it is used.

    21.2. Right to rectification

    You have the right to request the correction of any personal data that is inaccurate, and to have incomplete data completed.

    21.3. Right to erasure ("right to be forgotten")

    In certain circumstances, you have the right to request that the Trustees delete your personal data (for example, where the data is no longer needed for the purposes for which it was collected, or where the processing is unlawful). This right does not apply where the Trustees still need the data, for example to comply with legal obligations or to establish, exercise or defend legal claims, or where retention is necessary for the administration of the Scheme.

21.4. Right to restriction of processing

In certain circumstances, you have the right to request that the Trustees restrict the processing of your personal data (for example, while the accuracy of the data is being checked or where you have objected to processing and a balance of interests is being considered). Where processing is restricted, the Trustees will still be permitted to store the data and to use it for certain limited purposes, such as legal claims or important public interest reasons.

21.5. Right to object to processing

Where the Trustees process your personal data on the basis of their legitimate interests, you have the right to object to that processing on grounds relating to your particular situation. The Trustees will then stop processing your data for that purpose unless they can demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or the processing is required for legal claims.

21.6. Right to data portability

In certain circumstances, where you have provided personal data to the Trustees and they process it on the basis of consent or because it is necessary for the performance of a contract, and the processing is carried out by automated means, you have the right to receive that personal data in a structured, commonly used and machine readable format and to have it transmitted to another controller where this is technically feasible (where this does not adversely affect the rights and freedoms of other data subjects).

21.7. Rights in relation to automated decision making and profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, unless certain conditions are met.

As explained above, the Trustees do not currently make decisions about you that are based solely on automated processing and which have legal or similarly significant effects without appropriate safeguards. If this changes, the Trustees will comply with the relevant legal requirements, update this notice and will ensure that you are informed of your rights in relation to such decisions, which

may include the right to obtain human intervention, to express your point of view and to contest the decision.

21.8. Right to withdraw consent

Where the Trustees rely on your explicit consent to process particular personal data (for example, some health information), you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn, but it may affect the Trustees' ability to consider certain information or provide certain benefits.

21.9. Right to lodge a complaint

You have the right to lodge a complaint with the Trustees (as data controller) or the Information Commissioner's Office if you are concerned about the way in which your personal data is being processed, as well as the right to seek a remedy through the courts. Details of how to contact the Information Commissioner's Office are set out in the "Complaints" section below.

Contact

If you have any questions, comments or wish to make a subject access request, please do not hesitate to contact the Trustees at:

Address	The Trustees of the Wilkin Chapman Group Ltd Staff Pension Fund C/o Lisa-Jane Howes Wilkin Chapman LLP The Maltings 11-15 Brayford Wharf East Lincoln LN5 7AY
Email	lisa-jane.howes@wcrlaw.co.uk

Complaints

If you have any concerns in relation to the way your personal data has been handled, or consider there has been any breach of the Data Protection Legislation in respect of your personal data, **you can raise a complaint to the Trustees by completing the Complaint Form at the end of this notice (see page 10) and returning it to the Trustees by post or email using the details above**.

The Trustees will acknowledge your complaint within 30 days of receipt and then take appropriate steps to respond to your complaint (and inform you of the outcome) without undue delay. If the Trustees require further information in order to consider or respond to your complaint, we will let you know as soon as possible, but this may increase timeframes for the Trustees' response.

You also have the right to raise a complaint with the UK supervisory authority for data protection, the Information Commissioner's Office (**ICO**). You can contact the ICO at:

Address	Information Commissioner's Office Wycliffe House Water Lane Wilmslow SK9 5AF
Website	www.ico.org.uk
Telephone	0303 123 1113

Please keep a copy of this notice safe along with your other records relating to the Scheme.

Issued for and on behalf of

The Trustees of the Wilkin Chapman Group Limited Staff Pension Fund

24 May 2018

Reviewed and updated:

- 25 March 2022; and
- 12 February 2026.

Data Protection Complaint Form

Wilkin Chapman Group Limited Staff Pension Fund (the Scheme)

Full name:	
Address:	
Membership information:	**Membership number (if known):** **Date you joined the Scheme:** **Date you left the Scheme (if applicable):**
Status (please tick):	**Member ( ) Spouse ( ) Dependant ( ) Other ( )**
Personal data affected:	

Reason for complaint ***(Please explain the reason for your complaint, the personal data affected by the complaint and any key times/events relevant to your complaint.)***	
Data subject rights exercised (if any) – see Section 21 of this notice.	