

## Western Provident Association Pension Scheme ("the Scheme") Privacy Statement and Fair Processing Notice

This Privacy Statement and Fair Processing notice sets out the basis of how the Trustee of the Scheme will collect, store and process your personal data working with carefully selected third parties. The key priority is to safeguard the privacy and security of your personal data, while providing a service that meets your needs.

This document covers:

- [How we use information about you, including what data we collect, where it comes from and the legal basis for processing](#)
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The Scheme is a Pension Scheme registered in the UK and is regulated by The UK's Pensions Regulator, (TPR). The Trustee of the Scheme is a registered Data Controller in respect of your personal data, for the purposes of data protection legislation.

### How we use information about you

We will hold and process personal data in accordance with the Data Protection Act 2018, the UK's General Data Protection Regulation ("UK GDPR") and any other applicable laws and regulations relating to the processing of personal data and privacy.

Personal data that you have provided, or that has been received from WPA as your current or former employer, or occasionally that we have received from third parties such as HMRC, may include, but is not limited to, your: name, gender, sex, address and address history, date of birth, contact details, NI number, employment details (including salary details during employment or until the date the Scheme closed to future accrual), membership grade, and service and Scheme membership dates.

We use your personal data to administer the Scheme at both individual and collective Scheme levels. The Trustee has certain duties and powers which are conferred by law or by the Scheme's Trust Deed & Rules. In most cases, our processing of your personal data is necessary for the performance of those duties and exercise of those powers. In certain circumstances, processing personal data will not be strictly necessary to perform our legal duties, however, it will be necessary for the purposes of our legitimate interest of operating the Scheme as efficiently and securely as possible. Processing may also be in your interests

Therefore, the lawful basis for the Trustee storing and processing your data is:

### Personal data

- (1) Legal obligation: the processing is necessary for the Trustee to comply with their legal obligations under the Scheme.
- (2) Legitimate interests: the processing is necessary for our legitimate interests, namely to administer the Scheme.

### Special / Sensitive Data

In some circumstances, to comply with data protection legislation the Trustee will need your consent to collect and use special categories of personal data which may be sensitive. In

UK GDPR terms Special Data includes data which contains certain information such as racial or ethnic origin, political opinions, religious or similar beliefs, health information or information regarding your sex life or sexual orientation. In our pension context, where this may apply could be applications for ill-health early retirements, when submitting expression of wishes forms or applications for pension sharing on divorce.

In these circumstances we will ask you for consent to process sensitive data.

### Information Security and Data Protection

As custodians of your personal data the Trustee of the Scheme takes great care in ensuring appropriate technical and organisational measures exist to protect against data destruction or loss. For example, WPA as the sponsoring employer, along with XPS (the Scheme's administrator), both hold the ISO 27001 Standard – the International and British Standard for Information Security. The Trustee also has its own Data Protection Policy and Breach Management Policy to set out the steps the Trustee will take in the unlikely event that there is a serious breach of Information Security affecting your Personal Data.

The Trustee has not appointed a data protection officer (DPO), because, at the moment, our core activities do not require us to do so. If this changes, we will consider the need to appoint a DPO.

However, any questions regarding collection, use or other processing of your personal data can instead be directed to the Neil Davidson. [Email: Neil.Davidson@wpa.org.uk](mailto:Neil.Davidson@wpa.org.uk) telephone: 01823 625334, or in writing to: Neil Davidson, WPA, Rivergate House, Blackbrook Park, Taunton, TA1 2PE.

### Data sharing with third parties

We share information about you with a limited number of third parties that the Trustee feels are necessary to perform our obligations to you, including:

- WPA – as a member's current or former employer and Scheme sponsor, for the purposes of operating the Scheme, for the future operation of the Scheme, consideration of pension strategy, or to enable WPA to comply with its legal and regulatory obligations;
  - The Scheme's appointed Administrators, currently XPS;
  - The Scheme Actuary, currently XPS;
  - For members who made additional voluntary contributions (AVCs), the AVC providers, (currently Friends Life & Clerical Medical);
  - Other trusted third-party service providers including, but not limited to, the Scheme's appointed auditor, currently Mazars, and legal adviser, currently Osborne Clarke LLP.

The Trustee keeps third party providers under regular review and has the right to add or change providers as required. We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this notice and applicable laws.

In certain circumstances, it may be necessary for us to share information with HMRC and/or our Regulators.

If you are incapacitated, we reserve the right to share information with someone acting on your behalf.

We never share information with third parties for marketing purposes.

The Trustee of the Scheme does not transfer your personal data outside of the UK, but some of our appointed third parties may do so as part of their processing activities.

If this should happen appropriate the Trustee (or our service providers) we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice, and in accordance with applicable laws.

There are several measures for ensuring an adequate level of protection; including where certain countries have been deemed "adequate" by the Secretary of State in the UK (for example, countries within the European Economic Area have been deemed adequate), or where we transfer Personal Data outside the UK on the basis of the standard data protection clauses approved for use in the UK (or example, where we incorporate those clauses into our contracts with service providers based outside the UK).

### Your Data Protection Rights

Your personal data is protected by legal rights, which *may* (depending on the circumstances and type of data) include your right to:

- object to our processing of your personal data;
- request that your personal data is erased or corrected;
- withdraw your consent to the processing of sensitive data;
- request access to your personal data.

If you withdraw your consent or object to our processing of your personal data, this may impact our ability to consider whether you are eligible to receive benefits, put your benefits into payment, and / or continue to pay benefits to you.

You have a right to know what information we hold about you, and can make a Subject Access Request (SAR). Please note that in certain circumstances the Trustee may request an administration fee for supplying a copy of any personal information.

You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data. For more information please visit <https://ico.org.uk>

### Communicating with you

We use letter as our primary method of communication when we need to issue communications to you or request information from you. For that reason you should notify us of any changes to your personal contact information such as your name, address or email to ensure your personal information is correct and up to date.

Email is a useful way for you to contact us and for us to communicate back to you – but please remember that if you communicate with us by e-mail and we respond via email, the address you give us should be secure and not accessible by anyone else.

### Our Data Retention Policy

We will hold and process your personal data whilst you are a Scheme member so that we may administer your pension benefits and, if you die we will also hold and process data while a pension is being paid to any of your dependents. In addition, if you leave the Scheme by transferring to another pension scheme, or once you and all dependents have died, we will be entitled to continue to hold and

process your personal data for legal, regulatory and statutory reporting purposes. How long we will retain and process your personal data depends upon the reason for processing, but, given the longevity of pensions, queries can be received from Members and their advisers many years after termination and records need to be available. Where appropriate we will use reasonable endeavors to transfer post termination membership data to 'non-live', archive systems that are not routinely accessed in order to further minimise information security risks.

Where appropriate we will also consider using reasonable endeavors such as the anonymisation or pseudonymisation of personal data, in so far as any processing can be carried out in that form.

As detailed above, if you have any queries or to exercise your data protection rights please contact the Scheme Secretary, Neil Davidson. [Email: Neil.Davidson@wpa.org.uk](mailto:Neil.Davidson@wpa.org.uk)

And finally,

The Personal data we hold about you needs to be kept up to date. You are therefore requested to inform the Scheme Administrator of any changes to your personal data, and also to point out any potential inaccuracies, so that the administrator and Trustee can ensure their records are accurate. The contact details for the Scheme Administrator to update your personal data are:

Scheme Administrator contact details

XPS Administration  
One Temple Quay  
Temple Back East  
Bristol  
BS1 6DZ

Tel: 0117 2020402 or by email to [WPA@xpsgroup.com](mailto:WPA@xpsgroup.com)

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