

Sicame Electrical Developments Limited Pension Scheme (the “Scheme”) Privacy Notice

Information The Trustee holds about you

This Privacy Notice applies to information we hold about you. In this Privacy Notice, “it” means the Trustee of the Scheme.

The information which we hold is known as personal data and is subject to certain legal safeguards specified in data protection legislation and associated regulations (the **Data Protection Legislation**).

This Privacy Notice applies to information held by the Trustee of the Scheme about members, their dependents and all other persons in respect of whom benefits may be payable under the Scheme. By ‘information,’ it means personal and financial information about you that it collects, uses, shares and stores. This may include your name, address, date of birth, contact information, financial information, details about your health and lifestyle, employment details, and device identifiers including IP address.

Where this information comes from

You may provide this information directly to the Trustee, including by the way you communicate with it, such as using its telephone services or writing to it.

This information may also come from others, such as Sicame UK Limited (the **Company**) or other organisations such as tracing services via Lexis Nexis.

You should note that, if you do not provide the information that it tells you is mandatory, this may mean that it is unable to perform all of its obligations in relation to the Scheme properly (including correct payment of benefits).

How the Trustee uses your information

Data Protection Legislation requires that, where it processes your personal data, it must satisfy at least one prescribed condition for processing. These are set out in the Data Protection Legislation and it relies on a number of different conditions for the activities it carries out. Specifically, it may use your information for the following purposes and/or under the following legal bases:

- with your consent, where it uses sensitive data such as medical information
- where necessary for the performance of its duties in relation to the Scheme and/or where required by law, it uses your information to:
 - calculate your benefits
 - manage and administer the Scheme
 - contact you by post, phone, text, email and other digital methods, to help you manage your benefits and to give you statements and other information about your benefits or the Trustee’s relationship
- where it is in the Trustee’s legitimate interest to:
 - protect the Scheme and its members or to collect any debts owing to it
 - monitor, record and analyse any communications between you and it, including phone calls

- check your instructions to us
 - prevent and detect fraud and other crime
 - analyse, assess and improve the way in which the Scheme operates for members
 - protect the Trustee's interests
- where it is required by law, or where it is in our legitimate interests to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes, including sharing your information with UK or other relevant tax authorities, credit reference agencies, fraud prevention agencies, and UK and overseas regulators and authorities.

Sharing your information with others

It will keep your information confidential, but it may share it in certain circumstances, for the purposes set out in this Privacy Notice, with the following (who also have to keep it secure and confidential):

- the Company, which may also use the information for the purpose of preparing accounts or calculating remuneration packages
- the Scheme Administrator (First Actuarial)
- its remaining service providers and agents (such as the Investment Consultants, and Auditor, including their subcontractors (if any)). Each of these will need to ensure they comply with Data Protection Legislation. Please contact the Trustee if you would like their contact details
- tracing services via Lexis Nexis

Its actuaries. First Actuarial, including its individual Scheme Actuary, may be classed as data controllers with the Trustee when providing certain actuarial and consultancy services. Your point of contact for First Actuarial or the Scheme Actuary is Fosse House, 182 High Street, Tonbridge, Kent, TN9 1BE.

It may also share your information:

- with UK and overseas regulators and authorities in connection with their duties (such as crime prevention)
- with any other person or organisation in relation to restructuring the Scheme, as long as that person uses your information for the same purposes as it was originally given to the Trustee or used by it (or both)
- if it has a duty to reveal it, if it is needed to manage your pension, if a law or regulation allows us to do so, for legitimate business purposes or with your permission

How long the Trustee keeps your information

It will retain your information for as long as required for the purposes set out above or as required by applicable law.

Even where you have left the Scheme or your benefits have been brought into payment, it will continue to keep your information. It will do this for as long as it is allowed to in order to ensure that it can operate the Scheme properly, for its legitimate business purposes, to help prevent fraud and other financial crime and for other legal and regulatory reasons.

Your rights

You have rights concerning the way that the Trustee uses your information. You have the right to:

- request that it sends you (or a nominated third party) a copy of the information that it holds about you
- request that it corrects or erase any incorrect or incomplete information that it holds about you. The Trustee will correct any information that it believes is incorrect or incomplete
- request that it stops using your information. It will do so where there is no legal reason for it to continue to hold or use that information
- object to any automated decision-making
- ask the Trustee to transfer a copy of your information to you or to another service provider or third party, where technically feasible
- withdraw any consent that you have given to its use of your information.

To exercise any of the rights set out above, or to discuss any other issue in relation to your information, please contact us via the methods set out in the *Contact Us* section.

If you have any concerns about our use of your information, you have the right to make a complaint to the Information Commissioner's Office, which regulates the use of personal information in the UK, on 0303 123 1113.

The Trustee may make changes to this notice and how it uses your information in the future. If it does this, it will provide an updated version of this notice.

Contact Us

If you have any questions or comments about privacy issues, or have a complaint about how the Trustee is using your personal data, you can contact the Scheme's administration team in the following ways:

- by telephoning 01732 207575 (Christopher Campbell) or 01732 207588 (Sarah Potter)
or
- by emailing chris.campbell@firstactuarial.co.uk or sarah.potter@firstactuarial.co.uk
or
- by writing to the Trustee Secretary, Joanne Rudge, Lakeside, Measham Road, Oakthorpe, Derbyshire, DE12 7RF.

7 June 2024