

PRIVACY NOTICE

The Padley & Venables Pension Fund

1. Privacy Notice

- 1.1 The trustees ("**Trustees**") of the Padley & Venables Pension Fund ("**Scheme**") are data controllers and are responsible for collecting and processing your personal data. In doing so, we comply with relevant data protection legislation, including the UK GDPR.
- 1.2 This Privacy Notice explains why and how we collect your personal data, how long it will usually be retained for and the rights you have in relation to it.

2. Your personal data

- 2.1 As Trustees, we collect and process your personal data for the purposes of operating and administering the Scheme. This includes calculating benefits, assessing Scheme funding, responding to member queries and making investment and risk management decisions.
- 2.2 The data we hold includes your:
 - (a) name;
 - (b) address;
 - (c) salary and tax information;
 - (d) years of service with the Scheme, date you started (and left) your employment, and bonuses and benefits received;
 - (e) date of birth;
 - (f) National Insurance number;
 - (g) passport or other ID verification;
 - (h) marital status including family members and dependants and/or beneficiaries;
 - (i) member identification number;
 - (j) pension value, the contributions you make and any additional voluntary contributions made; and
 - (k) contact details.
- 2.3 We also collect and process some special (or "sensitive") categories of data. For example, we may hold information relating to your health for the purposes of paying ill-health and death benefits under the Scheme.

3. Lawful basis for processing your personal data

- 3.1 Under UK data protection law, we must have a lawful basis for collecting and processing your personal data.
- 3.2 We have set out the purposes and the legal bases relied on in the table, below:

Purposes	Categories of Personal Data	Legal Basis (and special category condition if applicable)
Calculating, administering and paying your benefits under the Scheme or following your death	<p>Personal details; business and/or personal contact details; marital status and relationship data; financial information; employment information and information relating to your Scheme benefits</p> <p>We may process special category data in the form of health information, for example where we process ill-health retirement claims.</p>	<p>Legal obligation</p> <p>To the extent we process special category data, we rely on the fact that processing is necessary in the field of employment, social security and social protection law in so far as it is authorised by domestic law</p>
Dealing with any queries/complaints/appeals etc. regarding decisions we have made, for example in relation to your or your dependants' entitlement to benefits under the Scheme	<p>Personal details; personal contact details; marital status and relationship data; financial information; employment information and information relating to your Scheme benefits</p>	<p>Legal obligation</p>
Carrying out actuarial valuations and investment of the Scheme's assets	<p>Personal details; business and/or personal contact details; marital status and relationship data; financial information; employment information and information relating to your Scheme benefits</p>	<p>Legal obligation</p>
Establishing a legal defence	<p>Will depend on the specifics of the legal claim but may include personal details; business and/or personal contact details; marital status and relationship data; financial information; employment information and information relating to your Scheme benefits</p>	<p>Legal obligation.</p> <p>To the extent that this requires us to process special category data, we rely on the fact that the processing is necessary for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity.</p>

Purposes	Categories of Personal Data	Legal Basis (and special category condition if applicable)
Compliance with other legal, regulatory and good governance obligations in relation to administering the Scheme and as otherwise lawfully permitted from time to time e.g., reporting to authorities, HMRC and the pensions regulator or processing as part of the UK pensions dashboard programme as applicable (for more information on the pensions dashboard see here: Homepage UK Pensions Dashboards Programme).	Will depend on the specifics of the legal obligation but may include any of personal details; business and/or personal contact details; marital status and relationship data; financial information; employment information and information relating to your Scheme benefits	Legal obligation
Management of IT servers and hosting, IT support functions, and management of information security management system	Processing could involve processing of any personal data held on the IT systems as required.	Legitimate interests in ensuring the IT systems run efficiently.
Establishing your identity and that of any other beneficiaries.	Personal details, ID documentation.	Legitimate interests in preventing unauthorised access to benefits.
Preventing and detecting fraud	Will depend on the specifics of the circumstance but could involve any categories of personal details; financial information and information relating to your Scheme benefits.	Legitimate interests in detecting fraud and preventing harm to other members.
Transferring to another pension plan	All personal details as required by the transferee.	Legal obligation
Sending updates and newsletters to you.	Personal details and contact information such as email and postal address.	Processing is based on the Trustees' legitimate interests of ensuring members and beneficiaries are kept up-to-date with relevant updates.

3.3 In relation to your special category data (such as data relating to your health or sexual orientation), we must have a lawful basis and a separate condition for processing. These are noted in the table above where applicable and will generally either be (i) a requirement in the field of employment, (ii) defence of claims or (iii) explicit consent. Please note that where we rely on your explicit consent you may withdraw your consent in relation to your special category data at any time by contacting us at the details set out below. Where you are physically or legally incapable of giving consent, the relevant condition will be processing of special category data on the basis of vital interests.

4. Where do we get your personal information from?

4.1 We hold and process data provided by:

- (a) you;
- (b) Padley & Venables Limited (and associated entities) ("**the Company**");
- (c) other pension schemes from which you may have transferred;
- (d) medical advisers;
- (e) HMRC;
- (f) DWP;
- (g) regulatory bodies;
- (h) publicly accessible records including the electoral roll; and
- (i) tracing organisations.

4.2 We also receive information from you about your proposed beneficiaries, who may be eligible to receive benefits on your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this Privacy Notice with them.

5. Who we share your personal data with

5.1 We share your personal data with certain third parties involved in running the Scheme, including:

- (a) the Company;
- (b) Mercer Limited (the Scheme Actuary and Investment Consultant);
- (c) NatWest (the Scheme Banker);
- (d) Capita Limited (the Scheme Administrator);
- (e) DLA Piper UK LLP (the Scheme Legal Adviser);
- (f) BHP (the Scheme Auditor);
- (g) Other professional advisers such as medical advisers, occupational health service providers, healthcare practitioners, insurers and pensions tracing services;
- (h) HMRC and the Pensions Regulator where necessary for the proper administration of your benefits, the prevention of crime or to meet legal and regulatory requirements;
- (i) UK's Money and Pensions Service and other dashboard providers if applicable as part of the UK's pensions dashboard programme; and
- (j) service providers such as IT and data hosting providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme.

5.2 In some circumstances we are independent controllers with the Scheme Actuary, the Scheme Legal Adviser, the Scheme Investment Manager and the Scheme Auditor (who may process your data to comply with their professional duties as advisers to the Trustees).

5.3 The Company holds your data to comply with its legal obligations as the sponsoring employer of the Scheme. It assists the Scheme being run in an accurate and cost-effective way and may offer certain options to members. The Trustees may share information with the Company and its auditors and advisers for this purpose.

5.4 The Scheme Administrator deals with member information on our behalf as a processor. This means they act on our instructions when administering the Scheme, such as responding to requests and ensuring payment of benefits. Other processors we use include other service providers such as the IT and data hosting providers.

6. International Transfers

- 6.1 The Trustees, or the Scheme Administrator on our behalf, will primarily store your personal data in the United Kingdom.
- 6.2 Some of the third parties listed above will from time to time transfer data to other countries for storage or receiving services as part of the operation of the Scheme, including outside the United Kingdom and European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place as required by data protection laws.
- 6.3 Please contact us if you would like further information about these safeguards.

7. Security

- 7.1 We are committed to ensuring your personal information is safe. We and our Scheme Administrators have implemented technical and organisational measures appropriate to the risks to ensure your personal data is secure and only processed as described in this Privacy Notice.
- 7.2 We also require third parties to keep your personal data secure and maintain adequate security measures.

8. Storage of your personal data

- 8.1 Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Scheme ends or you transfer out of the Scheme plus a further period to deal with any queries and complaints that may arise.
- 8.2 Once your membership ends, we may delete some of the data held in relation to you after 6 years. However, some information may be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.
- 8.3 We will set clear timeframes for data processed in accordance with any requirements relating to the pensions dashboard if and when they become applicable to the Scheme, including for "find" or "view" requests.
- 8.4 The Scheme Administrator applies the relevant retention timeframes to make sure personal data is not retained beyond its stated retention period.

9. Your rights

- 9.1 The UK GDPR grants individuals the following rights:
 - (a) *Right to access*: You have rights under data protection law to know what personal information we hold about you, the purpose for which we hold it and the identity of any person to whom it has been disclosed.
 - (b) *Right to rectification*: You may request correction of your personal data that is inaccurate and/or completion of such data which is incomplete.
 - (c) *Right to erasure*: You may request deletion of your personal data in certain circumstances. If you ask us to delete your information, we may not be able to do so, for example due to regulatory and contractual constraints which will be notified to you, if applicable, at the time of your request.

- (d) *Right to data portability.* You may request to receive your personal data, which you have provided to us, in a structured, commonly used machine-readable format and transmit those data to another controller. This is where the processing is based on consent or a contract and the processing is carried out by automated means.
 - (e) *Right to object:* You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on our or a third party's legitimate interest (Art. 6 (1) (f) UK GDPR). We then will no longer process your personal data for the purpose to which you have objected, unless we are able to demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms or for the establishment, exercise, or defence of legal claims.
 - (f) *Right to restrict processing:* you have the right to restrict our processing of your personal data in certain circumstances such as where the accuracy of your personal data is contested or the processing is unlawful.
 - (g) *Right to withdraw consent:* You also have the right to withdraw your consent to the use of your personal data, to the extent such use is based on your consent. Please note, however, that this could affect our ability to assess your entitlement to certain benefits, e.g. ill-health early retirement. If you do withdraw consent, then that will not affect the processing based on consent prior to consent being withdrawn.
- 9.2 If we require authentication of your identity when you make a request to exercise your rights, we may request that you prove your identity by providing us with a copy of a valid means of identification. This enables us to comply with our security obligations and to prevent unauthorised disclosure of data.
- 9.3 We have one month to respond to most requests (unless you have made a number of requests or your request is complex, in which case we may take up to an extra two months to respond). We will let you know if this is the case. We reserve the right to refuse, or to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your personal data, and for any additional copies of the personal data you request from us.
- 9.4 If you have any questions or wish to exercise any of the above rights, or if you have a complaint about the processing of your personal data you can contact us as detailed below.

10. Automated Decision Making

Automated decision making and profiling, including profiling that produce legal effects concerning or otherwise affecting such data subject, are not carried out by the Trustees in relation to the Scheme.

11. Direct Marketing

We may send you updates relevant to the Scheme, however we do not use your data for direct marketing or allow other organisations to use your personal data for the purpose of marketing their goods or services.

12. Contact details

If you have any questions about this Privacy Notice or about how we process your personal data, please contact the data controllers using the following contact details:

The Scheme Trustees: c/o Marie Elliot, Callywhite Lane, Dronfield, Sheffield S18 2XT

Email: melliott@padley-venables.com

13. Right to complain

- 13.1 You have the right to bring complaints directly to us and we maintain a complaints procedure for dealing with member complaints (including those relating to data protection issues).
- 13.2 A copy of the Scheme's 'Internal Dispute Resolution Procedure' for these purposes is available on request from the 'Contact details' above.
- 13.3 You can also raise a complaint with the office of the Information Commissioner, at www.ico.org.uk or you can call their helpline on 0303 123 1113. Complaints can be made via any route (email, post or telephone)

14. Updates

We will keep this Privacy Notice under review and may update it from time to time. Any revised policy will appear on the Scheme website. Material changes to our processing activities shall be notified to you in an updated version of this Privacy Notice.

Last updated: June 2026