

University of Warwick Pension Scheme (UPS)

Privacy notice

Who we are

UPS Pension Trustee Limited is the trustee (“the Trustee”) of the University of Warwick Pension scheme (“the Scheme”).

As the Trustee of the Scheme, we hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme 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.

- Data controllers decide the purposes for and the means by which personal data is processed. In the context of the pension scheme, the Trustee is a data controller but it is possible for there to be joint data controllers in respect of the same personal data.
- The University of Warwick acting as the Principal Employer is a joint Data controller given that data flows between participating employers and the Trustee as part of day to day activities. Similarly Mr Lloyd Cleaver of Willis Towers Watson acting as Scheme Actuary is designated as a Joint Data Controller. KPMG acting as auditor is also a Joint Data Controller.
- The joint data controllers are responsible for issuing its own privacy notice and we sign post these on the part of the pension web site dedicated to UPS
<https://warwick.ac.uk/services/humanresources/internal/rewardandbenefits/corebenefits/pensions/ups/gdpr/>

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 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, for example should you apply for an incapacity pension.

In order to properly administer the Scheme 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 Scheme 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 Scheme governing documents, as well as under relevant legislation. Your personal data will generally be collected directly from you or from your employer. We will not collect any personal data that we do not need.

Personal data relating to the Scheme 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 Scheme, 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 the 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.

Investment by default

This relates to those members in the “defined contribution sections” i.e. the parts of the Scheme where Zurich provide the investment funds and process members’ benefits. In this case Zurich transition funds as part of a lifestyle strategy and use dates of birth as part of the calculation routine. This is set to a default system unless you self-select your own funds. The process bases its automated decisions by age and target retirement age to determine the investment strategy. You can amend your investment choices by going to the [Zurich web-page](#).

Automatic enrolment

Under the Pensions Act 2008, every employer in the UK must enrol qualifying staff into a pension scheme and contribute towards it. This is called “auto enrolment”. If you are automatically enrolled (and not already contractually enrolled if applicable) then this would be because of an automated decision process based on the legal requirements. This is required to fulfil our legal obligations under the Pensions Act.

What else we do with personal data

Where the Trustee through the actions of its advisers transfer personal data to other countries, these details are set out within the Privacy Notice or other information of that adviser. We have tried to capture this information on our GDPR [web page](#) (full address on page 1).

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.

As the Trustee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

No	Third parties we contact	Purpose
1	Your employer, namely The University of Warwick, The University of Warwick Science Park (“the Science Park”), or Warwick University employment Group (WUEG) whichever is applicable. Please note the Science Park and WUEG outsource certain functions like Payroll to the University.	We obtain and provide pension information with your employer as part of normal day to day activities and in order to carry out the terms of the scheme rules.
2	KPMG	Acting as auditor and acting as DC adviser.
3	Lloyd Cleaver	Joint data controller, provider of actuarial services
4	Willis Towers Watson	Investment adviser
5	Lawyers (Sackers)	Occasionally advise on member cases as well as more general legal advice
6	Barnett Waddingham,	Day to day administration of the scheme
7	Zurich	Administer via their platform the defined contribution element and also do the investments through an associated company
8	Aviva,	Our appointed insurance company

9	Bankers' Automated Clearing Service (BACS)	Used to transfer money/pay pensions both in the UK and overseas
10	PTL	Secretary to the trustee service
11	Aviva-life assurance	Mainly managed via Barnett Waddingham
12	The Hub	Provider of annuity services
13	Prudential	AVC provider
14	HM Revenue & Customs	Under a legal obligation we need to send them information.
15	Pensions Ombudsman	Under a legal obligation we need to send them information.
16	Pensions Regulator	Under a legal obligation we need to send them information.

Retention

One of the principles in GDPR is that personal data should be kept for no longer than is necessary for the purposes for which the personal data are processed (except in certain specific and limited instances). However, as pension records cover many decades and potential dependants UPS retains data until all liabilities have expired.

Whilst we review the personal data held in relation to the Scheme we keep the data for as long as is needed to pay the correct benefit to all those covered by the Scheme including dependants and then for a further period to allow for any queries from statutory authorities or any other relevant source. This will normally mean for the lifetime of members and then a period after that. This approach to data will be kept under review. 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 Scheme, 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 the notice

please contact The Pensions Manager via e-mail at hr.pensions@warwick.ac.uk

or write to:

The Pensions Manager
University of Warwick
University House
CV4 8UW

If you wish to make a complaint about how we have handled your personal data you can complain to the Data Protection Officer (DPO).

Ms Anjeli Bajaj (DPO) can be contacted via e-mail at infocompliance@warwick.ac.uk

Or write to:

The Data Protection Officer
University of Warwick
University House
CV4 8UW

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**.

Updates to this notice

This notice is the latest version as at 16 May 2018. This notice will be updated from time to time and you can see the current version at any time on the GDPR page within the UPS Trustee's [website](#)

Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).