

THE GOLDSMITHS' COMPANY'S STAFF PENSION SCHEME

GENERAL DATA PROTECTION REGULATION

PRIVACY NOTICE

On behalf of The Goldsmiths' Company's Staff Pension Scheme Trustees ("the Trustees"), I am writing to confirm that we take looking after your personal information (known as 'data') very seriously and we are committed to ensuring that it is only used for the specific purposes set out below and that it is secure at all times.

As Trustees of the Scheme, we hold certain data about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed for the purpose of paying your Company pension 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 is subject to certain protections).

For legal purposes, the Trustees and the Scheme Actuary are known as Data Controllers in Common, as we decide the purposes for and the means by which the personal data we hold is processed. An appendix is attached which provides information on how the Scheme Actuary, Ben Fisher FIA and Xafinity Consulting Limited, use and safeguard your data.

What information we collect about you

Depending on the circumstances and stage of your pension scheme 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 your pension benefits)
- details about your spouse and/or dependants (including their names and possibly details of their gender)
- relevant employment information (including past salary information and employment dates)
- details about your pension benefits

- medical and other details about your health

How we use that information

The Trustees and Scheme Actuary have a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer, calculate and pay your Company pension to you. Personal data relating to your Company pension is held on paper and on computer systems and this information must be processed fairly and lawfully.

As part of running the Scheme, we may also need to hold or process particularly sensitive information about you and/or your dependants (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.

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.

However, as we seek help from various advisers to properly administer the Goldsmiths' Company's Staff Pension Scheme, or to ensure we remain compliant with legislation, we share personal data with the following:

- Our professional advisers, including for example the Scheme Actuary, auditors, investment advisers, consultants and lawyers
- the third party Scheme administrators who are responsible for the day-to-day administration of the Scheme, and for payment of your pension benefit, on our behalf
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator)
- Our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid), for a minimum of 6 years. But, given the nature of pension schemes, we may be required to keep some of your personal information for the rest of your life.

However, we review the personal data held in relation to the Scheme on a regular basis in accordance with our data retention schedule. 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/wrong, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Trustees to restrict/limit 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 Trustees 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 Trustees 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 Trustees 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 pension and/or our ability to answer questions relating to your pension payments.

Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee 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.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- make a complaint about how we have handled your personal data

please contact Mrs Helen Marks, Scheme Secretary, at the Goldsmiths' Company, Goldsmiths' Hall, Foster Lane, London EC2V 6BN, or by email:

helen.marks@thegoldsmiths.co.uk

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 May 2018. This notice will be updated from time to time and you can see the current version on the Goldsmiths' Company's website at www.thegoldsmiths.co.uk. Alternatively, if you would prefer to receive a hard copy of the notice, please contact the Scheme Secretary (see Who to Contact above).

LORD BRIDGES, CVO

Chairman

on behalf of the Trustees of The Goldsmiths' Company's Staff Pension Scheme