

Privacy Notice

CPLAS Trustees Limited (the **Trustee**) is responsible for the governance and management of the Horizon Pension Scheme (formerly the Capita Pension and Life Assurance Scheme (CPLAS)). For the purposes of the General Data Protection Regulation the data controller in respect of the Horizon Pension Scheme is the Trustee and the Trustee is ultimately responsible for compliance with the data protection laws.

The below notice sets out how the Trustee obtains, uses and protects any personal information that you provide, or that is otherwise obtained or generated by the Trustee and which relates to you or to any individual connected to you. Further information is contained within the Trustee's Data Retention Policy, a copy of which can be requested from the Secretary to the Trustee.

This privacy notice explains the following:

- What information the Trustee may collect about you;
- What the Trustee may use your information for;
- Who the Trustee may share your information with; and
- Your rights regarding your personal information which is held by the Trustee.

What do you mean by personal data?

By personal data we mean data relating to an individual by which they can be identified.

What personal data does the Trustee hold?

The Trustee endeavours to minimise the amount of data held. However, it does need to hold certain data in order to be able to provide the correct benefits to members and their dependants. This information may include some or all of the following:

- Personal details including name, address, date of birth, gender, marital status, details of dependants and national insurance number.
- Scheme membership and employment details, including period of service, salary and contributions paid.
- On occasion, certain sensitive personal data may need to be held (for example medical records if a member wishes to retire early on the grounds of ill health) – should this be required your consent would be requested.

Where does my personal data come from?

Aside from any detail that is provided by you, the Scheme also potentially receives or has received personal data from your employer, a former employer, HM Revenue & Customs, a tracing agency, your nominated financial adviser, your appointed representative and any previous pension provider where you had benefits.

Why does the Trustee need my personal data?

The Trustee collects and processes your data on the basis of the legal reasons set out below:

- The Trustee must hold and process personal data about members in order to carry out its legal obligations under the Horizon Pension Scheme Rules and legislation, including the following obligations:
 - To calculate and pay the correct benefits, and deal with any queries about these.
 - To communicate with you about your benefits and the pension scheme.
 - To pay tax charges, monitor whether allowances are exceeded and report to HM Revenue & Customs.
- It is in the Trustee's legitimate interests to be able to use the data to administer the Scheme, for example to ensure that the Scheme is correctly managed in line with the Trustee's duty to pay the correct benefits.

The Trustee will seek your express consent before collecting and processing certain sensitive personal data, such as medical records.

How long is my personal data retained for?

The Trustee will keep your personal data, in accordance with the law and regulatory guidance, for as long as is necessary for the purpose(s) for which it was collected, and for so long afterwards as the Trustee considers may be required to deal with any questions or complaints that they may receive about the Trustee's administration of the Scheme. When no longer needed, the Trustee will ensure that personal data is securely destroyed.

Who else is my data shared with?

The Trustee will share your personal data as necessary with the Scheme Secretary and with other advisers and service providers used to help administer the Scheme. Where possible, your personal data will be anonymised before it is shared.

All organisations have to ensure that they protect your personal data and only use it in line with principles contained in the data protection law and regulation. The Trustee has written agreements in place with its advisers and service providers to ensure their compliance with data protection law and regulation.

The Trustee may also share your personal data with other organisations such as tracing, archiving, document printing and distribution and IT service providers. In some circumstances, the Trustee may need to pass personal data to other third parties. Where this is required, the Trustee will take reasonable steps to ensure that such third party agrees in writing to act only on our instruction and provides appropriate guarantees in respect of their security measures to protect your data.

Your personal data may be transferred by the Trustee to third parties to countries outside the European Economic Area (the “EEA”). Where that is the case the Trustee will take reasonable steps to ensure that the processing of any personal data by the third party, including the transfer to the third party, complies with data protection laws and regulations, including, for example, requiring the third party to agree to certain data protection model clauses.

The Trustee may also pass personal information to other third parties at your request, for example where you are considering a possible transfer and you have asked the Trustee to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation the Trustee will assume that you have satisfied yourself that the third party has suitable security measures in place.

What are my individual rights in relation to the processing of personal data?

- Right to rectification (to have incorrect or incomplete personal data updated).
- Right of subject access (to determine and receive a copy of your personal data held by or on behalf of the Trustee).
- Right to be forgotten (to have your personal data deleted or removed if it is no longer necessary for the purpose of administering the Scheme).
- Right to data portability (to obtain and reuse your data for your own purposes).
- Right to lodge a complaint with the Information Commissioner’s Office.

Please contact the Scheme Secretary using the details below if you wish to exercise any of these rights.

Who should I contact if I have any queries?

Should you have any queries in relation to this notice or the Trustee’s Data Retention policy, then please contact the Scheme Secretary using the below address:

Horizon Pension Scheme
PO Box 555, Stead House
Darlington, DL1 9YT

Alternatively, further information can be obtained from the Information Commissioner Office, www.ico.org.uk.

Updates to this notice

We may update or amend this privacy notice from time to time to comply with the law or to meet changing requirements. Any changes made to the privacy notice will be notified to members.

This privacy notice was last updated in December 2023 and supersedes any previously issued notice in respect of the Scheme.