

## **The FDR Limited Pension Scheme**

### **Personal information and what we do with it**

The Trustee of the FDR Limited Pension Scheme (the "**Scheme**"), together with any other parties who deal with your personal details under the Scheme, need personal information about you to run the Scheme and pay benefits. In legal terms, as we are a 'data controller' of this information, we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

#### **What personal information we have**

We hold the following types of personal information:

- Your name, date of birth, national insurance number and bank account information;
- Contact details (including your address, phone number and email address);
- Your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time;
- Whether you are married or in a civil partnership and other information we might need to allocate and pay any death benefits due in relation to you;
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement;
- Contributions you have paid to the Scheme;
- Choices you have made in relation to your investment profile under the Scheme.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions where it is relevant to your entitlements under the Scheme.

#### **Where we get personal information from**

Some of the information we have comes directly from you. We may also get information (such as your salary and length of service) directly from your employer. In addition, Capita, which administers the Scheme on our behalf, may have obtained information from you and passed it to us.

Sometimes we get information from other sources, for example, another scheme if you have transferred benefits from them, government departments such as HMRC and DWP and publicly accessible sources (eg the electoral roll, the telephone directory and the General Registry Office) if we have lost touch with you and we are trying to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

#### **Our legal basis for using your personal information including how we share it**

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to running the Scheme.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights and to prevent and detect crimes such as fraud. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

We also have a legitimate interest in properly administering the Scheme. This includes paying benefits as they fall due, purchasing insurance contracts, communicating with you and ensuring that correct levels of contributions are paid, benefits correctly calculated and the expected standards of Scheme governance are met (including to follow the Pension Regulator's guidance).

In order to achieve this, we may share your personal information with various people, including any new trustees; employers; the Scheme administrator; the Scheme actuary; our professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; and IT and data storage providers and other service providers. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent and we will do so where that is necessary for us to run the Scheme in a sensible way. You can withdraw your consent at any time by using our

contact details (below). This may affect what we can do for you unless we have another lawful reason for using your information.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

Sometimes, your information may be used for statistical research but only in a form that no longer identifies you.

In March 2024 the Trustee signed an insurance agreement with Aviva Life and Pensions UK Limited (“Aviva”) which will meet the cost of future pension benefits payable to members of the Scheme. Aviva will be a joint controller with the Trustee in relation to your personal information in order for them to meet their obligations in terms of the insurance agreement.

### **How to contact the other people we give your personal information to**

Some of the people we mention above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers in their own right. In this case, they are subject to the same legal obligations as us in relation to this information and the rights you have in relation to your information apply to them too.

If you want any more information from any of these recipients or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

### **How long we keep your personal information for**

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of 15 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you or such longer period that the Trustee considers is necessary to ensure that the Scheme is able to correctly pay the benefits due to Members and respond to any future queries regarding the benefits of current or former Members.

However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), and our legal obligations (mentioned above).

### **Your rights in relation to your personal information**

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances and we will explain these to you where they are relevant.

The Scheme administrator’s contact details for exercising these rights are set out below and they can supply more information about these rights to you on request.

### **Keeping your information safe**

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

### **Queries and further information**

If you want more information about what we do with your information and what your rights are, the Scheme administrator can be contacted at:

FDR Limited Pension Scheme  
Capita  
PO Box 555  
Darlington  
DL1 9YT

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or call its helpline on 0303 123 1113.

## **The FDR Limited Pension Scheme**

Below is a brief description from one of our pension providers, Aon, on how they use your personal data in order to support us in the running of the scheme.

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), member options (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at: <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting contact us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH