

Liberty Retail Pension Scheme

Data Privacy Statement relating to the General Data Protection Regulation

What is this Statement for and what action do I need to take?

This statement sets out the information we are required to provide to members and others whose personal data we hold in accordance with data protection laws including the UK General Data Protection Regulation ("**GDPR**") as applicable to our data processing activities. Under the GDPR, the Trustees are required to write to you with information on how it will collect and use personal data about you, the circumstances in which it may share or otherwise use the personal data and to whom it may disclose this personal data.

This statement is for your information and you are not required to take any action.

Information the Trustees may collect (or already holds) from you, from Liberty Retail Limited (the "Company") or other third parties

For the purposes of data protection legislation, including the GDPR, the Trustees are the "data controller" as regards the personal data it collects about you and your dependants.

The Trustees may collect and process personal data about you in connection with the Liberty Retail Pension Scheme (the "**Scheme**"). The Trustees may obtain some of this personal data directly from you. The Trustees also obtain data from the Company and where relevant past employers in the Scheme.

Personal data may include the following:

- Membership and employment data including dates of joining and leaving employment, periods of pensionable service, earnings, contributions and details of benefits.
- Personal data including name, date of birth, sex, contact details (e.g. home address, telephone numbers and e-mail address) and your National Insurance number.
- Other financial data such as, bank sort code and account number, tax code, Lifetime Allowance and other protections.
- Identification documents including birth, marriage, civil partnership and death certificates, and pension sharing or earmarking orders.
- Family data, including current marriage or civil partnership, any previous relationships and dependants, death benefit nomination forms and potential beneficiary information.

In addition, the Trustees may collect, hold and use categories of personal data about you that are of a sensitive nature ("**Sensitive Personal Data**"), such as medical information.

Periodically, the Trustees may collect personal data relating to you from third parties such as HMRC. Please note that, at present, the Trustees do not receive information from the Money and Pension Service ("**MaPS**") relating to pensions dashboards and 'find requests' submitted to MaPS by individuals made in order to locate their pensions or benefits information.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained in this notice.

The Trustees are committed to protecting and respecting your privacy and rights.

Purposes for which and the basis upon which the Trustees will process your personal data

The purposes for which the Trustees will process your personal data, and the personal data of your dependants and the legal basis for doing so are set out in the table below:

Processing purpose	Types of personal data	Legal basis for processing
Administering the Scheme in accordance with its Trust Deed and Rules and applicable law	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in administering the Scheme in accordance with its governing documents and applicable law. We administer the Scheme in line with our legal obligations under applicable law. We administer the Scheme in line with our contractual obligations with you.
Determining your eligibility to receive benefits under the Scheme	Information provided by you: • name • date of birth • gender • marital status • financial information • National Insurance number • length of employment • details of dependants • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in determining whether you are eligible for receiving benefits under the Scheme We administer benefits in line with our contractual obligations with you.

Processing purpose	Types of personal data	Legal basis for processing
Determining the benefits payable to and in respect of you and paying the correct benefits on time to the correct recipient	Information provided by you: • name • date of birth • gender • marital status • financial information • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in paying the correct benefits on time to the correct recipient in accordance with the Trust Deed and Rules of the Scheme. We administer benefits in line with our contractual obligations with you.
Communicating with you about the Scheme and your benefits	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in communicating with you about the Scheme and your benefits. We may be legally obligated to provide certain information or communications.

Processing purpose	Types of personal data	Legal basis for processing
Establishing, exercising and defending our legal rights	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in establishing, exercising and defending our legal rights
For audit, compliance and other risk management	Information provided by you: • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us Information provided by employers and third parties: • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us	We have a legitimate interest in auditing the Scheme and Scheme data and ensuring that it is managed properly To ensure we administer the Scheme in line with our legal obligations under applicable law.
Considering any potential beneficiaries of death benefits under the Scheme	Personal data of potential beneficiaries: • name • date of birth • marital status • bank account details • contact details • other relevant information provided to us	We have a legitimate interest in determining the beneficiaries of your death benefits under the Scheme

We may also process special category data for the following purposes and under the following legal bases:

Processing purpose	Types of Sensitive Personal Data	Legal basis and special condition for processing
Considering your eligibility to receive benefits early on grounds of ill-health	health information	Your explicit consent to process your health data
Considering the eligibility of any potential beneficiaries to receive death benefits	health information	The beneficiary's explicit consent to process their health data, or the explicit consent of a holder of parental responsibility for a child

Where the Trustees are required to process special category data, it will approach the relevant member for specific consent to the processing of such data.

The Trustees will also process personal data to fulfil legal obligations to which they are subject.

Retention of personal data

The Trustees will hold personal data of members of the Scheme and their dependants for as long as may be necessary in order to fulfil the purpose of processing data described above including satisfying any legal, accounting or reporting requirements.

Inevitably, this means that personal data may be retained by the Trustees for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased. The end date for holding personal data in respect of a particular beneficiary is expected to be the date the Scheme is wound up.

To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, and whether we can achieve the purpose of the processing through other means. In the case of the Scheme, some personal data will be retained by the Trustees for periods of time which may seem extremely long in other contexts.

Disclosure of personal data

In the course of administering the Scheme, the Trustees may disclose your personal data to third parties providing processing services for the Trustees, such as:

- our pensions administrator, Aon Solutions UK Limited, who is responsible for the day-to-day administration of the Scheme;
- tracing agencies and consultants for mortality screening and locating members or updating Scheme data and statistical information; and
- Providers of IT services and other third parties who assist with the day-to-day administration of the Scheme.

They are required to take appropriate security measures to protect your personal data in line with our policies. The Trustees will only permit them to process your personal data for specified purposes and in accordance with Trustees instructions.

In addition, the Trustees may disclose your personal data to other controllers of personal data, including the Scheme actuary, legal adviser, insurer, auditor and AVC providers, who will be directly responsible under data protection law for protecting the personal data as data controllers. You will be able to find out more about the data protection policies of these data controllers from their own websites. Our Scheme actuary and Administrator, Aon Solutions UK Limited, have provided some further information (the Aon Solutions UK Limited Summary Privacy Notice) as enclosed

at the back of this notice. The summary from Aon includes a link to a more detailed summary of the reasoning that Aon has for processing personal data relating to members of the Scheme.

The Trustees may also disclose your personal information to other third parties in the following types of situations:

1. to an independent financial adviser as part of a special project such as an Enhanced Transfer Value exercise;
2. if they are under a duty to disclose or share your personal data in order to comply with any legal obligation, such as to a regulatory authority; or
3. to other third parties such as insurers, reinsurers and other advisers, for example as part of a special project under which benefits are protected through an insurance product.

Finally, the Trustees may transfer personal data to other data controllers including the Pensions Regulator, the Pensions Ombudsman, HMRC, the Department of Works and Pensions, or the courts or Pensions Ombudsman, if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or disputes procedure.

The list of recipients is not exhaustive and the Trustees may from time to time need to share personal data with other third parties in order to administer the Scheme and pay benefits, for example, if the Trustees engage a different service provider. The Trustees will update this Statement if the categories of recipient change.

International transfers of personal data

The Trustees have strict security procedures regarding the storage and disclosure of personal data. It is possible that the personal data that they collect about you may be transferred to, and stored at, or processed in one or more countries outside the United Kingdom ("UK") which has not yet been deemed by the UK Government to offer adequate data protection. It may also be processed by staff operating outside the UK who work for our third party service providers. In such cases, the Trustees will require the third party to provide an adequate level of data protection as required under the GDPR. If you wish to obtain a summary of these safeguards, please contact the Trustees at the below address.

Automated decision-making

The Trustees are required to inform you if any decisions are taken about you through an automated process (without any human involvement). This is not the case for the Scheme. The Trustees will notify you if the position changes.

Your rights under data protection laws

In certain circumstances, under the GDPR you will have the right to:

- to request details or copies of the personal data the Trustees hold about you as data controller (by making an access request to the Trustees). This right always applies. However, there are some exemptions which mean you may not always receive all of your personal data that we process;
- to have your personal data corrected or rectified if it is inaccurate or incomplete (which is important to ensure your benefits are paid correctly). This right always applies;
- to have your personal data deleted or removed in certain circumstances if there is no legitimate reason for its continued storage and processing;
- to object to your personal data being processed where we rely on a legitimate interest as the legal basis for processing your personal data (unless we have a compelling legitimate grounds for the processing);
- to restrict the processing of your personal data in certain circumstances (for example, if you want the Trustees to establish its accuracy or the reason for processing it);
- to request the transfer of your personal data which you have given us to another party (such as your independent financial adviser); and
- this right only applies where we rely on your consent as the legal basis for processing your personal data. Where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, once the Trustees have received notification that you have withdrawn your consent, they will no longer

process your information for the purpose(s) you originally agreed to, unless they have another legitimate basis for doing so in law. Please note that withdrawing your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal.

If you want to access, rectify or request deletion of your personal data, object to the processing of your personal data, request that we transfer a copy of your personal data to another party, or withdraw your consent to processing (if applicable), please contact the Trustees in writing at the address given below.

Changes to this Statement

The Trustees reserve the right to change this Statement and any other relevant policies or procedures at any time without notice to you.

Any changes the Trustees may make to this Statement will be notified to you from time to time either in writing or in other ways. You are advised regularly to check and review the Statement to ensure you understand how the Trustees may be processing your personal data.

Contact

If you have any questions concerning this Statement or the policies or procedures referred to above, please write to Liberty Retail Pension Scheme, PO Box 196, Huddersfield, HD8 1EG.

Right to complain

If you believe your personal data has not been handled in accordance with applicable data protection laws, you have the right to complain directly to us. Your complaint will be acknowledged within 30 days and investigated and responded to without undue delay. To exercise this right please contact: liberty.pensions@aon.com

If you are not satisfied with the outcome, you have the right to complain to the regulator. See Information Commission's (ICO) [complaints page](#). Their contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone number: 0303 123 1113

Live chat: <https://ico.org.uk/global/contact-us/contact-us-public/public-advice/>

Email address: casework@ico.org.uk

Aon Solutions UK Limited– Summary Privacy Notice relating to the processing of member data

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 Aon 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), liability management (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.

Aon may pass your personal information to third parties such as financial advisors and benefits providers, insurers, Aon 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 <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting 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