# THE YORKSHIRE BUILDING SOCIETY PENSION SCHEME ("SCHEME") MEMBER PRIVACY NOTICE

### Introduction

Pension benefits are paid over a long period. Your right to benefits under the Scheme will be based on information and personal data, linked to your past employment with the Society and also certain subsequent changes.

The Scheme's trustees (**"Trustees"**) have legal responsibility for the Scheme and are required to respect and protect members' privacy. This privacy notice (**"Notice"**) sets out the basis on which the Trustees process the personal data we collect from you as a 'controller' of your data.

This Notice applies to all Scheme members and any third parties whose information you provide to us (ie, details of relatives or beneficiaries).

We may update or amend this Notice (and will let you know if there are any material amendments).

### **Types of Personal Data Processed**

"Personal data" is a concept defined by data protection laws, and refers to information which relates to an identified (or identifiable) individual.

The types of personal data which we process will vary depending on the specific circumstances relevant to you. Typically, this will include:

- Your Personal Details including, your name, date of birth, gender, personal contact details;
- **Remuneration Data** including, pay, bank account details, social security or national insurance number and some tax information; and
- **Incapacity Data** including, personal data relating to ill health where this is relevant to the provision of benefits by the Scheme.

#### Legal Basis and Purposes for Processing Data

We use your personal data for many aspects of managing the Scheme.

Whenever we process your personal data, we do so on the basis of a lawful "condition" for processing. Processing of "special categories of personal data" (including, data relating to health, sexual life, racial or ethnic origin or religious beliefs) must also be justified.

The processing of your personal data will usually be justified to give effect to a contractual right, to allow us to comply with a legal obligation, or because it is in our legitimate interests as managers and administrators of the Scheme to do so.

Processing "special categories of personal data" is usually justified for the purposes of making a determination under the Scheme, where you have provided your explicit consent, or for the establishment, exercise or defence of legal claims.

The processing of data revealing criminal convictions will only be carried out where there is a legal authorisation to do so under either EU or local law.

## **Retention of Personal Data**

Our general approach is to only retain member personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you.

#### Sources of Personal Data

Your personal data will usually have been provided by you or by third parties (such as clients, other scheme administrators or regulatory bodies).

### **Disclosures of Personal Data**

We may share your personal data with others, for example, with third party administrators and professional advisers appointed by the Trustees.

Your personal data may also be disclosed to advisors, potential transaction partners or interested third parties in connection with a corporate transaction or restructuring of the Society.

#### **Cross-border Transfers**

The global nature of some of our third party service providers means that your personal data may be disclosed outside of the European Economic Area ("**EEA**"). Where third parties transfer your personal data outside of the EEA, we will take steps to ensure that your personal data receives an adequate level of protection.

You have a right to request a copy of any data transfer agreement under which we transfer your personal data, or to otherwise have access to the safeguards which we use.

### Security of your Personal Data

As Trustees, we implement reasonable physical, technical and administrative security measures designed to protect your personal data.

### Data Subject Rights

You have the right to access your personal data, to ask us to correct any errors in the data that we hold and in certain circumstances to erase your personal data.

You may also ask us to restrict the way we process your personal data or object to automated decision making processes that we may use.

Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time.

We hold personal data to ensure that we can administer and pay your pension benefits – without this data we may not be able to provide you with the services you require.

In addition to the above, you have the right to lodge a complaint with the Information Commissioner's Office.

#### Contact

If you have any questions or with to exercise any of the rights available to you and in relation to the Scheme, please contact the Secretary to the Trustees in the first instance at:

Secretary to the Trustees of the YBS Pension Scheme, Yorkshire Building Society, Yorkshire Drive, Bradford, BD5 8LJ