

Trustees of the Students' Union Superannuation Scheme

Privacy Notice

We are the Trustees of the Students' Union Superannuation Scheme ("SUSS"). As Trustees, we are a data controller of your personal data. This means we are responsible for complying with UK Data Protection Laws.

We are sending you this notice because you:

- are a member of SUSS; or
- are (or might be) eligible to receive benefits following the death of a member of SUSS.

As Trustees, we process 'personal data' about you in order to run SUSS and pay benefits. We also share your personal data with others when we need to. Personal data is any information that could be used to identify you as a living individual.

This privacy notice describes what personal data we collect about you and other people (for example, your spouse, civil partner, partner or dependants).

It also describes how we process (i.e. handle) your personal data, the basis upon which we process it, with whom it is shared, how it is stored, how it is protected and what rights you have in relation to it (including a right to object to processing in certain circumstances).

Please read this privacy notice carefully as it contains important information.

1. What personal data do we collect about you and how?

We collect personal data from you in a number of different ways:

- you may share information with us;
- we may collect certain personal data from third parties (please see below);
- we may also generate certain personal data in our running of SUSS (for example, information relating to your contributions and benefits).

If you are a member, we collect personal data from the following third parties:

- your current or former employer;

- any financial or other adviser or representative acting on your behalf and, if you want to transfer benefits, the trustees or managers of other pension schemes of which you are or have been a member;
- providers of services that allow us to verify the accuracy of your personal data (for example, to trace your current address or to verify your continuing existence); and
- public databases (for example, the register of births, deaths and marriages), government agencies (for example, Her Majesty's Revenue or Customs (HMRC) or the National Insurance Contributions Offices (NICO).

If you are (or might be) eligible to receive benefits following the death of a member, we may need to collect personal data from the following third parties:

- public records (for example, the register of Births, Deaths and Marriages);
- any adviser or representative acting on your behalf;
- other people who know or are related to, or were dependent upon the member, and anyone representing them;
- the executors of the member's will or the member's personal representatives and anyone representing them.

The types of data we may collect and use are set out in section 11 below.

In certain circumstances, we may ask you for personal information which is more sensitive (known as special category data). Examples would be where we ask for information that may reveal your racial or ethnic origin, religious beliefs, sex life or sexual orientation, or information relating to your health (for example, if you cannot work any longer due to incapacity and you want to take your pension benefits early).

When we ask for sensitive information, we will only ask for as much information as we need. We will also explain to you why we need that information and how we intend to use it. We may also need to handle information about criminal convictions relevant to you.

When we need to, we will ask for your consent for us to use your sensitive information or information about criminal convictions and offences. However, there are some cases where the law allows us to use sensitive information without your consent, including where we need to use it to establish, exercise and defend legal claims.

You may also need to provide us with personal data relating to other people (for example, your spouse, civil partner, partner or dependants). When you do so, you will need to check with them that they are happy for you to share their personal data with us and for us to use it in accordance with this privacy notice.

2. How do we use your personal data?

We primarily use your personal data for the purposes of operating SUSS. This includes processing any application to join SUSS, making decisions about you and your options and entitlements, and calculating your benefits and communicating with you.

In the table in Appendix 1 to this privacy notice, we have set out in detail how we use the different categories of personal data that we process about you.

If we wish to use your personal data for any additional purposes; we will update this privacy notice.

3. What is our lawful basis or ground for using your personal data?

Under laws which are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.

As Trustees, we have certain duties and powers which are conferred on us by law or by SUSS's governing documents. In most cases, our processing of your personal data is necessary for the performance of those duties and exercise of those powers.

In the table in Appendix 1 to this privacy notice, we have set out in detail the different legal bases or grounds we rely on for using your personal data in the ways that we do.

Please note that in certain circumstances, we will need your consent to collect and use your personal data; this is most likely where we are

collecting and using information relating to your health, or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, sex life or sexual orientation. If we have asked for your consent, you may withdraw your consent at any time.

You may withdraw your consent, or object to our processing of your personal data in a certain way (where you have the right to do so), by contacting the Trustees via the Scheme Administrator (full contact details below).

However, if you withdraw your consent or object to our processing of your personal data, this may impact our ability to consider whether you are eligible to receive benefits, put your benefits into payment, and or continue to pay benefits to you.

4. In what circumstances do we share your personal data?

We will share your personal data with the following categories of third parties:

- your current or former employer and SUSS' sponsoring employer (the National Union of Students) (or their advisers) - for the purposes of operating SUSS, or the future operation of SUSS, including securing, transferring or otherwise discharging your benefits, consideration of pension strategy and to enable such employers to comply with their legal and regulatory obligations;
- the SUSS administrators – we delegate some of our duties as Trustees (including pensioner payroll) to administrators; they are effectively responsible for the day-to-day running of SUSS;
- the SUSS actuary – this is an actuary that is personally appointed to SUSS to provide us with advice on the funding of SUSS. The actuary will be supported by an actuarial team who will also have access to your personal data;
- our benefit consultants – they provide advice on all aspects of running SUSS including the level and form of benefits to be provided to members of SUSS, investment, member communication and strategies for managing and mitigating the risks associated with SUSS;
- our insurers – they provide insurance cover for the payment of death benefits

- and / or provide annuity policies securing the benefits in SUSS;
- our investment managers and AVC providers – they invest SUSS's assets on our behalf;
- our auditors – they prepare SUSS' annual accounts and audit them for us;
- our lawyers – they advise us on all legal issues affecting SUSS;
- our covenant advisers – they advise us on the financial support that your current or former employer may be able to provide to SUSS;
- our indemnity insurers;
- any staff we employ and other companies that provide services to us (or to our administrators), such as communications consultants, printers, suppliers of data cleansing, verification and tracing services and other information technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services;
- any financial adviser you appoint in relation to transferring your benefits to another pension scheme;
- the trustees or managers and (where appropriate) the sponsoring employers of any pension scheme to which your benefits are or are proposed to be transferred, including (where appropriate) their advisers; and
- statutory bodies (for example, the Pension Protection Fund), or government agencies in connection with contracted-out benefits (for example, HMRC and NICO).

Details of all of the main advisers to SUSS are available in the SUSS annual report and accounts which are available on request from the Trustees via the Scheme Administrator (full contact details below).

Some of these third parties process your personal data in countries which are outside of the United Kingdom ("UK"). Please see section 5 below.

We will also disclose your personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or any lawful request from any legal or

- regulatory authority or where it is necessary in the substantial public interests to make such a disclosure; or to respond to any claims, and to establish, exercise or defend our legal rights.

Some of the third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. They are known as 'data processors' because they act strictly on our behalf and in accordance with our instructions. These third parties include our administrators.

In the event that such third parties process personal data acting in a data processor capacity, we will take reasonable steps to ensure that such third party processors enter into an agreement confirming that they act on our documented instructions and provide appropriate guarantees in respect of the technical and organisational security measures governing the processing to be carried out in accordance with UK Data Protection Laws.

However, certain third parties (most notably, the SUSS actuary, our benefits consultants, insurers, auditors, lawyers and other professional advisers) are subject to certain legal or regulatory obligations, including professional codes of practice. They will be data controllers (and so directly responsible to you for their own processing of your personal data) to the extent that processing is subject to, or relates to, those obligations.

Some of these data controllers have their own, separate, privacy notice which applies to their use of your personal data instead of this notice. These can be viewed by contacting the Trustees via the Scheme Administrator (full details below).

A list of the key third parties with whom we share your personal data is set out in Appendix 2.

5. Do we transfer your personal data outside the UK and the EEA?

In certain circumstances, your personal data is processed outside of the UK; for example, by individual trustees who are operating or travelling outside the UK and by third party service providers that may store certain personal data in a country outside the UK. When we (or our service providers) process personal data

outside of the UK, we take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice, and in accordance with applicable data protection laws and regulations.

In practice, we will only permit the transfer of such personal data where certain safeguards are in place (such as adequacy decisions or standard contractual clauses), as approved by the Information Commissioner and/or the UK Secretary of State from time to time. If you want to know more about how personal data is transferred, please contact us using the details set out below.

6. How long do we retain your personal data?

We keep your personal data for no longer than we need to for the purposes for which we use it, as set out in section 2 of this privacy notice.

We will need to keep your personal data for as long as you are a member of, or receiving benefits from, SUSS. If you die, we will continue to hold your personal data to pay any benefits due to your spouse, civil partner, partner or dependants.

We will also keep your personal data for as long as necessary to answer any questions about the administration of SUSS, deal with any complaints or claims, exercising or defending our legal rights, or complying with any legal or regulatory requirements. We will keep your personal data even if you have no spouse, civil partner or dependants, or if your spouse, civil partner or dependants die, or if you transfer out of SUSS.

We need to keep your personal data this long because of the long-term nature of pension schemes, and the fact that questions can arise many years after someone has died or left SUSS. As a result, we will generally keep your personal data for the lifetime of the pension scheme plus 15 years (i.e. the longest period of time that someone can bring a claim against SUSS).

However, where we can, we will delete or transfer personal data that we no longer need to 'offline' archive systems or make use of other techniques in order to minimise information security risk.

Third parties may also keep your personal data on similar valid grounds for such long periods in accordance with their respective privacy notices.

7. What are your rights in relation to your personal data?

You have the following rights in relation to your personal data. You can ask us for more information about any of these rights by contacting the Trustees via the Scheme Administrator (full contact details below):

- (a) **Right of access:** You have a right of access to any personal data we hold about you, including asking us for a copy of your personal data;
- (b) **Right to update your information:** You have a right to request an update to any of your personal data which is out of date or incorrect;
- (c) **Right to delete your information:** You have a right to ask us to delete any personal data which we are holding about you in certain specific circumstances;
- (d) **Right to restrict use of your information:** You have a right to ask us to restrict the way we process your personal data in certain circumstances;
- (e) **Right to data portability:** You have a right to ask us to provide your personal data to a third party provider of services in certain circumstances;
- (f) **Right to object:** Where we process your personal data on the basis of our, or another person's, legitimate interest, you have a right to ask us to consider any valid objections which you have to our use of your data; and
- (g) **Rights related to automated decision making:** We do not use automated decision making or profiling. Automated decision making occurs when decisions are taken solely on automated processes. Under UK Data Protection Laws, you have the right to ask that, if you are being evaluated, any decisions are not solely based on automated processes or to have any decision reconsidered by a member of staff.

We will consider all requests from you to exercise your rights (including whether they apply in a particular case) and provide our response within a reasonable period. In any

event we will provide a response within one month of your request, unless we tell you we are entitled to a longer period.

Please note that certain personal data may be exempt from such requests, for example if we need to keep using the information to comply with our own legal obligations. If an exception applies, we will tell you this. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

8. How do we keep your personal data secure?

The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to take all reasonable precautions to safeguard the confidentiality of personal data.

We make every effort to protect the personal data you provide to us – including putting in place measures to ensure that any personal data sent to third parties is secure in accordance with our data protection obligations. However, please note that the transmission of information over the internet is not completely secure and we cannot guarantee that the transmission is 'risk-free'.

Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access and take steps to ensure that any third parties with whom we share data do the same.

Where we have given you (or where you have chosen) a password which enables you to access an account relating to your membership of SUSS via BWebstream, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9. Changes to this privacy notice

We may amend this privacy notice from time to time. Any changes we make will be notified to you in the next communication from us, such as the annual summary funding statement, your annual benefit statement (if sent), member newsletter, or an updated version of the explanatory booklet.

10. Further questions or complaints

If you have any queries or complaints about our collection, use or other processing of your personal data, or if you wish to exercise any of your rights described above, please contact the Trustees via the Scheme Administrator (full contact details below).

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.

You may also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection regulator, or a different data protection regulator in the country where you usually live or work, or where an alleged infringement has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

11. Personal data we process

We may collect and use the following types of personal data about you and, in some cases, your spouse, civil partner, partner or dependents:

- name(s);
- gender;
- national insurance number;
- employee and membership number;
- date of birth;
- home address and telephone number;
- personal e-mail address;
- marital status and family / dependents (e.g. benefits payable on death);
- your current or former employer;
- the date you joined and left employment and employment status (e.g. full time or part time);
- dates on which you joined and left pensionable service;
- your salary information;
- your normal or anticipated retirement date;
- your status as a member of SUSS;
- circumstances of retirement or leaving service;
- information relating to your health (e.g. in relation to incapacity benefits);
- information on criminal convictions;
- information relating to your contributions to and benefits under

- SUSS (including any contracted-out benefits);
- information relating to any money purchase benefits you have in SUSS (including how these are invested);
- information relating to any pension sharing or earmarking order (if your marriage or civil partnership ends);
- tax information, your income tax band, and any protections you have in relation to your benefits; and
- your bank account details.

12. Defined terms

In this privacy notice, the following terms have the following meanings:

us, we or our means collectively the Trustees, as data controller of the personal data relating to SUSS.

SUSS means the Students' Union Superannuation Scheme.

SUSS actuary means Paul Hamilton FIA at Barnett Waddingham LLP or such other actuary as appointed from time to time.

Trustees means such persons who act as trustees from time to time.

UK Data Protection Laws means the UK data protection laws and regulations from time to time.

The Trustees may be contacted at:

Trustees of SUSS
c/o Barnett Waddingham LLP
St James' House
St James' Square
Cheltenham
GL50 3PR

Email: studentsunion@barnett-waddingham.co.uk

This privacy notice was last reviewed and updated in June 2025.

Appendix 1 – Our lawful basis for processing your personal data

Description of personal data	Why we need it and how we use it	Our lawful basis for processing it
Member name and National Insurance (NI) number	<p>To operate SUSS and your membership of it (for example, to calculate your benefits).</p> <p>To verify your identity, to prevent and detect fraud and to comply with our legal and regulatory obligations.</p> <p>To carry out actions relating to the wider operation of SUSS; for example, to calculate SUSS's liabilities and the sums that the employers need to pay to SUSS, to set up insurance policies to meet the SUSS liabilities or in connection with liability management exercises, transferring your benefits to another scheme or arrangement, a scheme merger, or any proposal to make changes to SUSS's benefits.</p> <p>Occasionally, for statistical analysis or to respond to government surveys (such as questionnaires sent to us by the Pensions Regulator or the Office of National Statistics), although both activities will usually be undertaken on an anonymous basis.</p>	<p>To comply with certain duties, and to exercise certain powers, which are conferred on us by law or by SUSS's governing documents ("Legal Obligation Ground").</p> <p>For the purposes of our, or a third party's legitimate interests in operating SUSS as efficiently and securely as possible ("Legitimate Interests Ground").</p>
Member date of birth	To know when Members are reaching ages at which they have an entitlement to benefits under SUSS and to help us work out how long they are likely to be in receipt of benefits from SUSS so we can determine the likely cost of such benefits.	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p>
Member address	<p>To communicate with you.</p> <p>The law requires us to provide Members with information. We need their address to comply with this obligation.</p>	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p>
Salary information	To correctly calculate contributions and benefits and to help to work out how much money we will need in SUSS in the future to pay promised benefits.	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p>
Bank account information	To pay the benefits that have been promised under SUSS.	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p>
Health information	To determine entitlement to benefits which only arise where an ill health condition is met; for example, when a member wishes to retire early on ill health.	This information is likely to fall within a special category of personal data as defined in Article 9 of GDPR (for example, information concerning health or

Description of personal data	Why we need it and how we use it	Our lawful basis for processing it
	<p>We may also use this information to purchase insurance policies.</p> <p>We may also use it when a member informs us that (e.g.) he requires his annual statements in braille or in large text due to visual impairment.</p>	<p>sexual orientation) or personal data about criminal convictions and offences (together, “sensitive data”).</p> <p>The Trustees will process such data in accordance with its Data Protection Policy (the “Policy”) and the purposes of the processing are set out in the Policy.</p> <p>Under the Policy the Trustees may sometimes seek explicit consent to process sensitive data. Alternatively, on occasion the Trustee may rely on a provision in the Data Protection Act 2018 (the “Act”) which allows it to process sensitive data without explicit consent.</p> <p>Where the Trustees are processing sensitive data without consent, it is doing so in reliance on the condition in paragraph 1 of Schedule 1 to the Act, which permits processing where it is “<i>necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the data controller or the data subject in connection with employment, social security or social protection</i>”. The Trustees may also use sensitive data without explicit consent where there is a reason of substantial public interest.</p> <p>The processing of this information satisfies the lawful processing requirements in Article 6 of GDPR for the reasons set out in section 1.2 of the Policy. In particular, processing of sensitive data is necessary for the purposes of legitimate interests pursued by the Trustees or by other parties. The Trustees have a duty to administer SUSS properly and pay benefits as they fall due.</p>

Description of personal data	Why we need it and how we use it	Our lawful basis for processing it
Information relating to Member and/or any nominated beneficiary included in a death benefit nomination form	As part of the information we take into account when we consider who should receive any discretionary death benefits in the event of a member's death.	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p> <p>Sensitive data about a nominated beneficiary who is a parent, grandparent, great grandparent, or sibling of a member can be processed without consent if it is necessary for determining eligibility or benefits under an occupational pension scheme, and it does not involve measures or decisions about the data subject. In such circumstances, we may rely on paragraph 21 of Schedule 1 to the Act.</p>
Member's marital status	To determine whether there is an entitlement to spouse's death benefits under the Scheme	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p>
<p>Name, address, date of birth, NI number and relationship to Member of anyone claiming death benefits</p> <p>The Trustees may also need information about the individual's financial position</p>	To determine entitlement to and amount of any death benefits payable from the Scheme from time to time in respect of a member.	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p>
Information about criminal convictions of Members or anyone who may be claiming benefits under SUSS	To ensure that benefits are not paid where a crime has been committed in order to obtain them, or where any other party is entitled to all or part of the benefits as a result of the Member or other person's criminal activities (which bar that person from entitlement).	<p>Legal Obligation Ground</p> <p>Legitimate Interests Ground</p> <p>To the extent the processing is necessary for substantial public interests in order to comply with a statutory obligation and/or to prevent or detect unlawful acts.</p>

Appendix 2 – Key third parties

This section lists the key third party service providers with whom we share your personal data.

Role	Third party	Other information (if applicable)
Actuary	Barnett Waddingham LLP	Our actuary will be a controller for some aspects of their services. You can access their privacy notice here: https://privacy.bwllp.co.uk/bw/privacy-policy.pdf
Administrator	Barnett Waddingham LLP	The administrator is our processor.
Auditor	RSM UK Audit LLP	Our auditor will be a controller for some aspects of their services. You can access their privacy notice here: https://www.rsmuk.com/privacy-and-cookies/entities-privacy-policy
Covenant advisers	Interpath Advisory	Our covenant advisers will be a controller for some aspects of their services. You can access their privacy notice here: https://interpath.com/policies-and-regulatory-information/uk/privacy-notice-interpath-ltd/
Insurers	Friends Life, Aviva	Our insurers will be a controller. You can access their privacy notice here: https://www.aviva.co.uk/services/about-our-business/products-and-services/privacy-policy/retirement-privacy-policy/
Legal advisers	Gowling WLG	Our legal advisers are processors for some aspects of their services and a controller for other aspects. You can access their privacy notice here: https://gowlingwlg.com/en/footer/privacy-statement