Phoenix Dunlop Oil & Marine Pension Scheme
Privacy Notice

This Privacy Notice has been issued by the Trustee of the Phoenix Dunlop Oil & Marine Pension Scheme (the Scheme) to comply with the General Data Protection Regulation (GDPR), and UK GDPR. It explains more about the information we hold about you, how we use it and what your rights are.

This document replaces any Fair Processing Notice issued under the Data Protection Act 1998 with effect from 25 May 2018 when the GDPR comes into effect.

Data controllers

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and the Scheme Actuary are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the UK GDPR. The Trustee of the Scheme is Phoenix Dunlop Pension Trustees Limited. The Scheme Actuary to the Scheme is Debra Logan of Barnett Waddingham LLP.

It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Scheme's auditor or legal advisers.

The joint data controllers can be contacted as follows:

Address: Trustee of the Phoenix Dunlop Oil & Marine Pension Scheme, c/o Barnett Waddingham LLP, Decimal Place, Chiltern Avenue, Amersham, HP6 5FG

Email: Phoenix@barnett-waddingham.co.uk

Telephone: 0333 11 11 222

What information do we collect about you?

In the course of running the Scheme, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Scheme's administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name (and previous or alternate names), National Insurance number (and partial or "dummy" National Insurance number), gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme).
- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Scheme).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the data controllers by your employer or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme. Your personal data will be stored until such time as we no longer need it but in any event for not longer than 7 years after the date the Scheme is wound up.

Who do we share your data with?

The Trustee shares your data with the Scheme's administrator Barnett Waddingham LLP, the Scheme Actuary and Dunlop Oil & Marine Limited as the sponsoring employer. In addition, if you have Additional Voluntary Contribution (AVC) funds, the Trustee shares your data with the AVC providers, Equitable Life and/or Coventry Building Society. The Trustee may also share data with the Trustee's other professional advisers (including the Scheme Auditor and Scheme legal advisers), insurers, and regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Trustee can share your data with the employer for the purposes of providing information to the members about access to the pension freedoms via transfer values (either via a one-off exercise or as a business as usual offering) or other incentive exercises (such as but not limited to a Pension Increase Exchange exercise whereby members are offered the option to exchange future pension increases for a higher non-increasing pension and trivial commutation exercises).

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustee's formal Data Mapping document, available on request in writing to the data controllers at the address above.

In certain circumstances, we may also process your personal data for detecting, investigating or preventing crime, including fraud; sharing information with a public authority or safeguarding a vulnerable individual.

How do we use the information?

The Scheme administrators, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's **legal obligation** to run the Scheme in accordance with the Trust Deed and Rules. The Trustee and/or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustee's **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme (*so that the correct benefits can be paid*)
- Undertake risk-management exercises (*so that the risk your benefits are not paid is reduced*)
- Comply with the law, including regulations and guidance issued by the Pensions Regulator (*so that you, the Trustee and their advisers are not subject to legal sanctions which may impact benefits*)
- Efficiently manage the impact of any change to the legal status of the sponsoring company (*so that your benefits are not adversely affected for example by a sale or company merger*)

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries. The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

Your personal data will not be directly transferred to another country unless you request this to be done.

Your rights in relation to your data.

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the Data Controller at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to request that your personal data is moved, copied or transferred.
- You have the right to make a complaint to us, if you have any concerns over how we, as the data controller, handle your personal data. We will acknowledge any complaint within 30 days and respond without undue delay. Details can be found in our Internal Dispute Resolution Procedure which can be requested from Barnett Waddingham
- You have the right not be subject to automated decision-making (with no meaningful human involvement) including profiling where it produces legal or other significant effects on you. In such cases, appropriate safeguards such as your right to be informed about decisions, to obtain human intervention and to make representations and contest such decisions will apply. The Trustees do not currently take any decisions based solely on automated processing which would produce legal or similarly significant effects on you.
- You have the right to lodge a complaint about the data controller with the Information Commission – see below for details on how to do this.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

Information on how to raise a complaint with the Information Commission is available at www.ico.org.uk/concerns. You can also call its helpline on 0303 123 1113. The regulator will usually expect you to raise a complaint with us first before reaching out to them and we appreciate the opportunity to try to resolve your concerns.

Further details about UK GDPR and your rights under UK GDPR can be found on the IC's website at https://ico.org.uk/.If you have concerns about the way we handle your personal data, please contact us using our internal procedures. If you remain dissatisfied you can contact the Information Commission or raise a complaint at **www.ico.org.uk/concerns**, or call its helpline on 0303 123 1113.

The Trustee of the Phoenix Dunlop Oil & Marine Pension Scheme
August 2026