

## **Capper & Co Ltd Pension and Assurance Scheme (the "Scheme")**

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

The Trustees of the Scheme need personal information about you to run the Scheme and pay benefits. We also share your personal data with others when we need to and have provided more information in relation to this below. Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustees about how your personal information will be used for those purposes. The other parties include the Scheme Actuary (currently Ray Hughes of Hughes Price Walker Limited).

In legal terms, we the Trustees and the Scheme Actuary are 'joint controllers' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what the Trustees do with your personal information, and also what the Scheme Actuary does with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, 'we' means both the Trustees and the Scheme Actuary where they are acting as joint controllers in relation to your personal information (as described above).

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

We normally hold some or all of the following types of personal information:

- Your name (including previous or alternate names), date of birth, national insurance number and bank account information (where benefits are in payment).
- Your sex/gender (we use this to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. 'Mr., Mrs., Ms.')
- Contact details (including your address, former addresses, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of 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 pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.
- Your signature.
- Data contained within driving licenses and/or passports.
- Personal details of any relatives or individuals you may have named as potential beneficiaries in the event of your death.
- Details of any contributions paid by you or on your behalf to the Scheme, including Additional Voluntary Contributions.
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Scheme.
- Data contained in correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state scheme.
- Data contained in correspondence that we may have received about you from your appointed independent financial adviser.
- Electronic "pension identifiers" for pensions dashboards (which we explain further below).

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 and offences, but only where it is relevant to the payment of Scheme benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

### **Pensions Dashboards**

The Government has created a framework for pensions dashboards, designed to help people access information about their pensions online and in one place. As part of this, we are required by law to match certain members (who search on dashboards) with their pensions under the Scheme. We must also provide certain pensions information to the dashboard's ecosystem (including the identity service, the pension finder service, the consent and authorisation service) so that it can be displayed when the relevant member asks to see it on a dashboard.

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards, and with the provider(s), the integrated service provider(s) and the administrator we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these duties, we may also need to report information (which could potentially include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

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

Some of the information the Trustees have comes directly from you (for example, when you joined the Scheme or when you apply to take your benefits). In addition, Hughes Price Walker Limited, who administers the Scheme on behalf of the Trustees, may have obtained information from you and passed it to the Trustees. The Trustees may then in turn pass information about you to the Scheme Actuary or may instruct the administrator to do so. The Trustees are the source of the personal information which the Scheme Actuary has about you.

Sometimes the Trustees gets information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (e.g. the electoral roll) and, occasionally, through tracing agencies if the Trustees have lost touch with you and are trying to find you.

If the Trustees 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.

In certain circumstances, we may ask you for personal information which is more sensitive. Examples would be where we ask for information concerning your health (for example if you cannot work any longer due to incapacity and you want to take your pension benefits early).

If the Trustees 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.

Some of your personal data may be collected indirectly through the pensions dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service). Where we obtain personal data from the dashboards ecosystem, or during the process of matching members with the Scheme benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Scheme.

### **Why we hold personal information and how we share it**

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

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

Pensions dashboards regulations also impose a legal obligation on us to match certain members with their pensions and provide information on their pension benefits. Testing data and getting ready for pensions dashboards compliance can also be part of our legal obligations.

The Trustees also have a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; establishing eligibility for benefits; complying with audit of scheme accounts; deduction and payment of tax due; complying with the pensions dashboards regulations; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

In order to achieve this, the Trustees may share your personal information with various people, including:

- any new trustees;
- the Scheme employers;
- the Scheme administrator;
- the Trustees' other professional advisers;
- auditors;
- insurers;
- statutory bodies such as HMRC, the Pension Protection Fund and the National Insurance Contributions Office;
- the Pensions Ombudsman;
- the Pensions Regulator;
- the Information Commission;
- integrated service providers (relevant to pensions dashboard compliance), the pensions dashboards ecosystem, non-commercial dashboards and commercial dashboards; and
- IT and data storage providers and other service providers.

If your benefits are transferred to another scheme, the Trustees will also need to provide the administrators of that scheme with information about you.

When the Trustees need to use information about your health (or other sensitive personal information), they may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustees to use this information without consent, and they will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time. This may affect what the Trustees can do for you, unless they have another lawful reason for using your information. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

The Trustees 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.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustees may share your personal information with the employers so that they can contact you for that purpose.

We may need to share personal data with insurers in relation to the purchase and pricing of insurance contracts called 'annuities' (unless that can happen based on anonymised data). Insurers will use that data to verify the assets and liabilities of the Scheme. We may write to you before purchasing an annuity to ask for up-to-date information about your spouse/partner/children/other dependants, for this purpose.

We will share your personal data when we purchase an annuity, and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). We will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Scheme membership ID number; marital status and details about spouse/partner; date of birth; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

### **Scheme Actuary**

The Scheme Actuary is appointed by the Trustees to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustees and the Scheme Actuary for statistical research, but only in a form that no longer identifies you. In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustees have anonymised before sharing with them.

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

Some of the people mentioned 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 provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from any of the people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustees and they 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 (including if your data originated from the pensions dashboard ecosystem and if you were matched up with the Scheme through that). 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.

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.

Data from the pensions dashboards ecosystem is kept for the life of your member record, if we do find a match (i.e. if you are a member of the Scheme). If we don't find a match (i.e. you're not a member of the Scheme), we will delete the data from the dashboard immediately. If we find a potential match, we will keep the data from the dashboard for 30 days in a secure form so that we have more time to determine whether there is a match or not. We will delete data after 30 days if there is no match, or keep it for the life of your member record if we do find a match.

## 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;
- in particular circumstances, 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. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

To exercise these rights, please use the Scheme administrator's contact details which are set out below. The Scheme administrator can also 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. 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).

### **Changes to this policy**

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. We encourage you to check this privacy notice from time to time.

### **Queries and further information**

If you want more information about what we do with your information and what your rights are, please contact the Trustees at: [capper@hughespricewalker.co.uk](mailto:capper@hughespricewalker.co.uk)

If you have concerns about the way we handle your personal information, 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.

**We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.**

**February 2026**