Ernest Doe & Sons Limited Pension Fund ('the Scheme')

Purpose of this notice

This privacy notice is issued on behalf of the Trustees of the Ernest Doe & Sons Limited Pension Fund and aims to give you information on how the personal data regarding your membership of the Scheme is collected and processed.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

We may update this privacy notice from time to time. We will provide you with a new privacy notice when we make any substantial updates.

Data Controller

We, the Trustees of the Ernest Doe & Sons Limited Pension Fund ("the Scheme"), will be the "data controller" of the personal information collected and used by the Scheme. This means we are responsible for deciding what personal data about you is required and how it should be protected.

In addition, third parties such as the Scheme Actuary, our actuarial advisers (First Actuarial) act as a data controller for the personal data that they use. This privacy notice also covers these data controllers. If you would like a list of the third parties who currently fulfil these roles, this is available on request.

What personal data do we hold and use?

We hold personal data on you to enable us to calculate and pay benefits to you or your dependents. The information will also be used, where necessary, for the financial management of the Scheme.

The information we hold on you may include:

- details of your employment history, including salary information
- personal information including name, maiden name, date of birth, National Insurance number and contact details
- records of any benefits you have transferred into the Scheme from other pension arrangements
- records of any contributions you or the Employer, on your behalf, have paid into the Scheme
- information on benefits you will receive from the Scheme
- your bank account details (but only from the time we need to start paying benefits to you)
- names of death benefit nominees
- anything else the Scheme requires for its particular benefits.

Why do we hold this information?

We hold this information because we have a legitimate interest in ensuring that you and/or your dependants get the benefits you are entitled to receive, to ensure that the Scheme is well run and has sufficient funds to pay the benefits promised.

We may also use it to comply with our legal obligations, for example in calculating whether the Scheme has enough money to pay future benefits and to meet our requirements under the Pension Schemes Act 2021 and associated regulations relating to pensions dashboards.

We may also need to use this information for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.

We may also hold and use more sensitive data (also known as “special categories of data”) such as health information collected when considering whether to pay any ill-health benefits.

We may need this sensitive data if it is necessary for us to pay ill-health benefits to you, or death benefits to the people you have nominated. If we use this data it will be in accordance with our contract with you, and/or because you consent, at the time, to us holding and using this information. You may withdraw that consent at any time, in which case we will erase that sensitive data. However, if we consider that doing this will prevent us from paying the correct benefits to you or your dependants, we will let you know before proceeding.

The Scheme Actuary and First Actuarial also hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing actuarial advice and valuations for us. For example, the Scheme Actuary carries out calculations to advise us if the Scheme has enough money to pay the future benefits promised to its members.

Where did we get information about you?

The personal data we hold about you was given to us by:

- **The employer**, who provided us with data such as your salary information, part-time working details, and information on when you joined and left employment.
- **You**, for example, through the forms which you completed when you joined the Scheme. You (or your family members) may also have provided information subsequently when you contacted the Scheme to discuss your benefits, to tell us about a change of address or for other reasons.
- Previous pension schemes, where you transferred your benefits into the Scheme. This will include information such as your dates of service, contracted-out benefits (if applicable) and contributions.
- Tracing agencies, where you have changed address but not notified the Trustees, as we need to obtain your address in order to keep in touch with you about your benefits.
- Doctors, if you take early ill-health retirement and information regarding your health has been provided to the Trustees to facilitate this.

International Transfers

We won’t transfer your personal data outside the United Kingdom unless in the following circumstances:

- You are an overseas member
- You transfer benefits to a Qualifying Recognised Overseas Pension Scheme (QROPS)

Where we transfer data internationally, we ensure appropriate safeguards are in place, such as:

- Standard contractual clauses approved for use in the UK
- International Data Transfer Agreements
- Your explicit consent (for transfers you have requested)

If you would like more information about international transfers, please contact us using the details at the end of this notice.

Who do we share information with?

To run the Scheme, your personal information will be used by the Scheme Administrator and our advisers, as necessary (including the Scheme Actuary, actuarial advisers, auditor and legal advisers). We may also need to share your personal information with other parties such as annuity providers, firms providing death-in-service insurance services for the Scheme and tracing agencies (for example, if you move to a new house and don't tell us your new address). Where we do share information with these parties we remain in control of the data and we will ensure that suitable data protection agreements are in place.

We may transfer your data to separate third parties. These parties are:

- official organisations who we have a legal obligation to provide information to. This includes HMRC and The Pensions Regulator
- insurance companies, for example, if we buy an annuity on your behalf
- other pension schemes, if you ask us to transfer your benefits to a new scheme
- the Employer, or their advisers, to enable them to manage their financial commitment to the Scheme, to produce pension related accounting disclosures and to allow them to answer questions you may have about your benefits or to give you guidance on pension related matters.

We only share information about you where it is necessary for the running of the Scheme. We do not share information about you for any other reason.

Some of our appointed third parties may transfer your data outside of the EU as part of the processing activities they undertake for us. Where this occurs, it will be subject to appropriate protections.

How long do we keep your data?

We will keep information about you for the lifetime of the Scheme. Should we change the administrators or advisers who help us to run the Scheme, we will ensure the previous providers pass your personal data onto the new ones and erase any other copies of your personal information after a suitable period.

The Scheme Actuary and the actuarial advisers also keep a copy of the information. Should we change our Scheme Actuary or actuarial advisers, the existing provider will keep a copy of the data for a minimum of one year and a maximum of seven years.

Your rights

You may ask for a copy of the information we hold on you. You may make this request by contacting us.

If, at any point, you believe the information we hold on you is wrong, you can ask us to correct it.

In some circumstances, you may also have a right to ask us to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

Note that if you ask that the personal data we already hold is restricted or erased, this may affect our ability to administer your benefits, including the payment of benefits from the Scheme. In some cases it could mean the Trustees are unable to put your pension into payment or has to stop your pension (if already in payment).

Right to Complain

You have the right to contact us if you have any concerns with how we use your personal data. We will acknowledge your complaint within 30 working days and will do our best to resolve your concerns. You do not have to make your complaint in a specific way, but these should be submitted to our Scheme Administrator (contact details below).

You also have a right to complain to the Information Commissioner's Office (ICO) if you believe that our use of your personal data is in breach of data protection laws and/or regulations. More information can be found on the ICO's website (ico.org.uk). Exercising this right will not affect any other legal rights or remedies you have.

Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Scheme so that we can continue to pay you benefits when due, and contact you about your membership of the Scheme. In particular, please let us know if you move home, so that we can stay in touch with you.

Contacting us

You may contact us for further details on how we use your personal information, or with any other questions about this privacy notice, including any requests to exercise your rights, via the Scheme Administrator whose contact details are:

The Ernest Doe & Sons Limited Pension Fund
c/o First Actuarial LLP
Fosse House
182 High Street
Tonbridge
Kent
TN9 1BE

Telephone: 01732 207 500
Email: tonbridge.admin@firstactuarial.co.uk

Sent on behalf of the Trustees of the Ernest Doe & Sons Limited Pension Fund

(updated June 2026)