

PRIVACY NOTICE (SUMMARY)

for the members and beneficiaries of the Wiltshire Pension Fund

As the Administering Authority of the Fund Wiltshire Council holds certain information about you (“personal data”) which we need to administer the Fund.

We have summarised some of the key ways in which we deal with this information below. Further information can be found in the Full Privacy Notice via the following link:

www.wiltshirepensionfund.org.uk

What personal data do we hold?

The types of data we hold and process will typically include:

- Contact details, including name, address, telephone numbers and email addresses.
- Identifying details, including date of birth and national insurance number.
- Information relating to your benefits in the Fund, including length of service or membership and salary.
- Other information in relation to your membership of the Fund or to enable the calculation or payment of benefits, for example bank account details.
- Information about your family, dependents or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death.
- For a small number of members and only where relevant and required we hold information about your health, for example, to assess eligibility for benefits payable on ill health, or where your health is relevant to a claim for benefits following the death of a member of the Fund. We will hold this information subject to your consent, unless we can lawfully process this data for another reason permitted by legislation.
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Fund and the employer or Fund may be reimbursed from your benefits.

We obtain some of this personal data directly from you. We may also obtain data from your employer (for example, salary information) and from other sources including public databases.

What will we do with your personal data?

We will use this personal data to administer the Fund and to calculate and provide you (and, if you are a member of the Fund, your beneficiaries if you die) with benefits. We will also use this personal data for statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members’ benefits and how that money should be invested), and to comply with our legal obligations.

From time to time we will share your personal data with third parties, including our contractors, advisors, government bodies and dispute resolution and law enforcement agencies and insurers in order to comply with our obligations under law, and in connection with the provision of services that help us carry out our duties, rights and discretions in relation to the Fund. These organisations are listed in the full Privacy Notice.

In some cases, these recipients may have operations outside of the UK. If this occurs, we will make sure that appropriate safeguards are in place to protect your data in accordance with applicable laws. Please use the contact details below if you want more information in connection with this.

What is the legal basis for our use of your personal data?

The legal basis for our use of your personal data will generally be one or more of the following:

- a) we need to process your personal data to satisfy our legal obligations as the Administering Authority of the Fund; and

- b) we need to process your personal data to carry out a task in the public interest or in the exercise of official authority in our capacity as a public body; and
- c) we need to process your personal data for the legitimate interests of administering and managing the Fund and liabilities under it, calculating, securing and paying benefits and performing our obligations and exercising any rights, duties and discretions the Administering Authority has in relation to the Fund; and
- d) because we need to process your personal data to meet our contractual obligations in relation to the Fund (for example, under an agreement that you will pay additional voluntary contributions to the Fund), or to take steps, at your request, before entering into a contract.

How long will we hold your data?

We will only keep your personal data for as long as we need it to administer the Fund and to deal with any questions or complaints that we may receive about this, unless the law requires us to keep it for a longer period or the fund actuary requires it for actuarial purposes. In practice, this means that your personal data will be retained for as long as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Fund. This data will also be retained indefinitely when those benefits stop being paid in order that the Fund can assess the longevity of Fund members and therefore contribute to broader research on LGPS pensioner longevity. For the same reason, your personal data will also need to be retained where you have received a transfer, or refund, from the Fund in respect of your benefit entitlement as proof that you no longer have any further benefit entitlement from the Fund.

Your rights

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances, you may also have a right to ask us to restrict the processing of your personal data until any errors are corrected, to object to processing or to transfer or (in very limited circumstances) 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).

If you wish to exercise any of these rights, please contact the Fund Administrator below. You also have the right to lodge a complaint in relation to this summary notice, the full Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

From time to time, we may ask for further information from you. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the benefits payable to you by the Fund. In some cases, it could mean that we are unable to put your pension into payment or we have to stop your pension (if already in payment).

Contacting the Fund and/or the Data Protection Officer

If you would like to access any of the information we hold about you or have any concerns regarding the way we have processed your information then please contact the Wiltshire Pension Fund on telephone number 01225 713613 or by emailing pensionenquiries@wiltshire.gov.uk if you require any further information.

The Data Protection Officer can be contacted in the same way or by sending a letter to the Data Protection Officer, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire. BA14 8JN or on telephone No. 0300 456 0100