Notcutts Limited Pension and Life Assurance Scheme
Privacy Notice

Purpose Of This Notice

This Privacy Notice explains how we use and protect your personal information as a member of the Notcutts Limited Pension and Life Assurance Scheme (the "Scheme"). We may provide additional notices when we collect specific types of information, which will supplement this notice.

We will notify you of any substantial changes to how we use your information and provide you with an updated notice when necessary.

Who Is Responsible For Your Information?

The Trustees of the Notcutts Limited Pension and Life Assurance Scheme, are the “data controllers” of your personal information and are responsible for your personal information and deciding how it is used to administer the Scheme.

Contact Details:

First Actuarial LLP, 2nd Floor Office, Orton Pavillion, Peterborough Business Park, Lynch Wood, Peterborough, PE2 6FY

peterborough.admin@firstactuarial.co.uk

01733 447698

Who we work with: We work closely with the Scheme Administrator (First Actuarial LLP), our Scheme Actuary (Neal Thompson), and our advisers. In providing services to the Scheme, the Scheme Actuary (Neal Thompson) acts as a joint data controller with us and is therefore covered by this Privacy Notice. The Scheme Administrator (First Actuarial LLP) and our advisers process personal data on our behalf and act as data processors.

What Personal Information Do We Hold?

We hold personal data about you to enable us to administer your membership, calculate your benefits, and pay benefits to you or your dependants. The information is also used for the financial management and governance of the Scheme.

The personal data we hold includes:

- Employment history: details of your employment, including dates of service and salary information
- Personal details: name, previous names (including maiden names), date of birth, National Insurance number, postal address, email address and telephone number
- Benefits information: records of benefits transferred into the Scheme from other pension arrangements, additional voluntary contributions, and details of benefits payable from the scheme
- Family information: details of your spouse, civil partner, or other dependants who may be entitled to benefits
- Banking details: bank account information (when we need to start paying benefits to you)

Special Category Personal Data

In certain circumstances, we may need to process more sensitive “special category” personal data, such as:

- Health information: when assessing eligibility for ill-health benefits or considering applications for early retirement on medical grounds
- Information about family members: when paying dependant’s benefits following your death

We process this information where it is necessary for the purposes of carrying out our obligations and exercising specific rights in connection with employment, social security and social protection law (Article 9(2)(b) UK GDPR).

In some cases, particularly where we obtain medical evidence, we may also seek your explicit consent to access and use your health information.

We will always explain why we need special category data and how we will use it. You have a right to object to this processing, though this may affect our ability to pay certain benefits.

Legal Basis For Processing Your Data

We process your personal data under the following legal basis as set out in the UK General Data Protection Regulation (UK GDPR):

We have legitimate interest in:

- Ensuring you and your dependants receive the correct benefits
- Administering the Scheme efficiently and effectively
- Ensuring the Scheme is properly funded and has sufficient assets to pay out benefits
- Maintaining accurate records of membership and benefits
- Preventing and detecting pension fraud

Where Did We Get Your Information?

We obtained your personal information from:

- **Your employer:** who provided us with data such as your salary information, part-time working patterns, and notification of changes to your employment
- **You directly:** through application forms, benefit option forms, expression of wish forms, correspondence, and notifications to your personal circumstances
- **HM Revenue & Customs**: tax codes and any information about guaranteed minimum pension entitlements
- **Tracing agencies:** where it was necessary to use an agency to contact you
- **Medical professionals**: with your consent, when assessing ill-health benefit applications

Who Do We Share Your Information With?

To run the Scheme effectively, we share your personal information with:

Scheme Administrators and Advisers

- Scheme Administrator: First Actuarial LLP
- Auditors, legal advisers, and other professional advisers

Regulatory and Government Bodies (where required by law)

- HM Revenue & Customs (HMRC)
- The Pensions Regulator
- The Pensions Ombudsman
- Department for Work and Pensions

Other Organisations (when necessary for Scheme administration)

- **Insurance companies:** if we purchase annuities or insurance on your behalf
- **Other pension schemes:** if you transfer your benefits to another scheme
- **The sponsoring employer**: to enable them to manage their financial obligations to the Scheme and answer your benefit questions
- **Tracing agencies:** if we need to locate you

We only share your information where necessary for the proper administration of the Scheme. We do not sell or share your information for marketing purposes.

Where we share information with administrators and advisers, we remain in control of your data and ensure appropriate data protection agreements are in place.

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.

How Long Do We Keep Your Data?

We retain your personal data for as long as necessary to fulfil our obligations to you and your potential beneficiaries, and to comply with legal and regulatory requirements.

In practice, we retain your data as follows:

- Active members: throughout your membership
- Deferred members: until benefits commence or are transferred
- Pensioner members: as long as we are paying you a pension
- Dependants: personal data is retained until we pay them a benefit or their information is updated by you
- After benefits cease (or you transfer out): we will retain your personal data for the lifetime of the scheme to address potential claims and meet regulatory requirements

Our Scheme Actuary and actuarial advisers retain copies of data for up to seven years after they cease to act for the Scheme.

If we change administrators or advisers, your data will be transferred securely to new providers, and previous providers will retain your personal data for up to 2 years to assist us with any handover

Automated Decision-Making

We do not use automated decision-making (decisions made solely by computers without human involvement) to make decisions about your pension benefits.

Your Rights Under UK GDPR

Under the UK GDPR, you have the rights to:

Access Your Information

You can request a copy of the personal information we hold about you at any time. This is called a Subject Access Request. We will respond within one month.

Correct Inaccurate Information

If we hold incorrect information about you, you can ask us to correct it. Please contact us as soon as possible if any of your details change.

Request Deletion

In some circumstances, you can ask us to delete your information. However, we may need to retain it to meet legal and regulatory requirements for pension schemes.

Restrict How We Use Your Information

You can ask us to restrict how we use your data in certain circumstances, such as while we investigate a complaint about data accuracy.

Object to Processing

You can object to how we use your information. However, we may not be able to stop processing your data if it is necessary to:

- Administer the Scheme and pay your benefits
- Comply with legal obligations
- Meet regulatory requirements

In these cases, we will explain why we need to continue processing your data.

Data Portability

You have a limited right to receive your data in a structured, commonly used format.

Right to Complain

You have the right to contact us or our data protection officer (if appointed) 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, for quicker resolution, we encourage you to send in your complaints to peterborough.admin@firstactuarial.co.uk.

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 : https://ico.org.uk/. Exercising this right will not affect any other legal rights or remedies you have.

Keep Us Informed

It is important that we hold accurate and up-to-date information about you. Please notify us promptly of any changes to your:

- Address
- Marital or civil partnership status
- Banking details
- Dependants

Keeping your details current ensures we can contact you about your benefits and pay you correctly when benefits become due.

Contacting Us

If you have any questions about this privacy notice or how we use your personal information, please contact:

The Trustees of the Notcutts Limited Pension and Life Assurance Scheme
First Actuarial LLP
2nd Floor Office, Orton Pavilion,
Peterborough Business Park,
Lynch Wood,
Peterborough,
PE2 6FY

Telephone: 01733 447698
Email: Peterborough.admin@firstactuarial.co.uk

This privacy notice was last updated on: June 2026