

FULL PRIVACY NOTICE

for the members and beneficiaries of the Police Pension Schemes

This notice is for members of the police pension schemes (the "**Scheme**"). It has been prepared by The Chief Constable of Cleveland (the "**Police Pension Authority**", or "**we**") in their capacity as the manager of the Scheme (the "**Scheme Manager**").

Why we are providing this notice to you

As Scheme Manager we hold certain information about you ("**personal data**") which we use to administer the Scheme and to pay benefits from it. This notice is designed to give you information about the data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it.

The technical bit

The Police Pension Authority holds personal data about you in its capacity as data controller for the proper handling of all matters relating to the Scheme, including its administration and management. This includes the need to process your data to contact you, to calculate, secure and pay your benefits, for statistical and financial modelling and for reference purposes (for example, when we assess how much money is needed to provide members' benefits and to inform the Home Office of any additional funding requirements), and to manage liabilities and administer the Scheme generally. Further information about how we use your personal data is provided below.

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 Scheme Manager; and/or
- 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/or
- c) because we need to process your personal data to meet our contractual obligations to you in relation to the Scheme.

What personal data we hold, and how we obtain it

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth, national insurance number and employee and membership numbers.
- Information that is used to calculate and assess eligibility for benefits, for example, length of service or membership and salary information.
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax 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.
- 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 Scheme.
- Information about a criminal conviction where this may result in pension forfeiture as set out under Police Regulations** and Home Office Circular 18/09.

We obtain some of this personal data directly from you. We may also obtain data (for example, salary information) from your current or past employer(s), from a member of the Scheme (where you are or could be a beneficiary of the Scheme as a consequence of that person's membership of the Scheme) and from a variety of other sources including public databases (such as the Register of Births, Deaths and Marriages), our advisers and government or regulatory bodies, including those in the list of organisations that we may share your personal data with set out below.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained within this notice.

How we will use your personal data

We will use this data to deal with all matters relating to the Scheme, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you.
- to assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits.
- to identify your potential or actual benefit options and, where relevant, implement those options.
- for statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members' benefits).
- to comply with our legal and regulatory obligations as Scheme Manager.
- to address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Scheme.
- the management of the Scheme's liabilities.

Organisations that we may share your personal data with

From time to time we will share your personal data with advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Scheme. Some of those organisations will simply process your personal data on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal data that we share with them. They are referred to as data controllers

and we have highlighted them in the table below. The data controllers may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example, via their websites.

These organisations include the Scheme's:

| Data processors | Data controllers |
|--|---|
| <ul style="list-style-type: none">• Third party administrators - (currently Kier)• Overseas payments provider to transmit payments to scheme member with non-UK accounts - (currently Western Union)• Printing companies - (currently Adare)• Pensions software provider - (currently Aquila Heywood)• BACS provider – (currently Bottomline)• Confidential Waste Disposal provider – (currently ShredIt) | <ul style="list-style-type: none">• Actuarial consultant - (currently AON Hewitt)• Actuary - (currently AON Hewitt)• External auditor - (currently Mazars)• Internal auditor - (currently TIAA Ltd)• The Department for Work and Pensions• The Government Actuary's Department• The Cabinet Office - for the purposes of the National Fraud Initiative• HMRC• The Courts of England and Wales - for the purpose of processing pension sharing orders on divorce |

In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

Where requested or if we consider that it is reasonably required, we may also provide your data to government bodies and dispute resolution and law enforcement organisations, including those listed above, the Pensions Regulator, the Pensions Ombudsman and Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their functions.

The organisations referred to in the paragraphs above may use the personal data to perform their functions in relation to the Scheme as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties, to the extent they consider the information is reasonably required for a legitimate purpose.

We do not use your personal data for marketing purposes and will not share this data with anyone for the purpose of marketing to you or any other member.

How long we keep your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Scheme, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations. In practice, this means that your personal data will be retained for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme and for a period of 15 years after those benefits stop being paid.

For the same reason, your personal data may also need to be retained where you have received a transfer, or refund, from the Scheme in respect of your benefit entitlement.

Special Categories – including health related issues

Special Category data is personal data which the data protection regulations 2018 says is more sensitive and therefore requires more protection.

We must have a lawful basis to process this data but we must also satisfy a specific condition under article 9 (2) of the act.

We would seek your consent to process this data unless we can lawfully process the data for another reason under Article 9 (2).

You have the right to withdraw your consent to the processing at any time by notifying the Police Pension Authority in writing. However, if you do not give consent, or subsequently withdraw it, the Police Pension Authority may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Administration of the Scheme for those living outside of the European Economic Area (EEA)

For those living outside of the EEA it will be necessary to provide your data to recipients outside of the UK, for example your bank. Those outside of the EEA jurisdiction may not offer an equivalent level of protection as is required by the EEA countries. If this occurs, we are obliged to verify that appropriate safeguards are implemented with a view to protecting your data in accordance with applicable laws.

Your rights

The new UK data protection law changes as of 25th May 2018, the same day the EU's General Data Protection Regulation (GDPR) came into force.

A key area of change in the new Data Protection Act relates to individuals rights. The law refreshes existing rights by clarifying and extending them and introduces new rights such as the “right to be forgotten”, the “right to restriction of processing” and the “right to data portability”.

If you wish to know more about your information rights please contact the Data Protection Officer, details below, or you can visit Cleveland Police internet site via the following link <https://cleveland.police.uk/Services/DataProtectionNEW.aspx>.

Updates

We may update this notice periodically. Where we do this we will inform members of the changes and the date on which the changes take effect.

Contacting us

Please contact the Cleveland Police data protection team for further information.

Data Protection Officer

Version 1: issued on 13th August 2018

You may also contact our data protection officer Maria Hopper for further information. The address is:

Data Protection Officer

Maria Hopper
Cleveland Police
Shared Service Centre
Ash House
III Acres
Princeton Drive
Thornaby
Stockton on Tees
TS17 6AJ

Email:

information.rights.requests@cleveland.pnn.police.uk

**Police Pension Regulations 1987 K5, Police Pension Regulations 2006 55 Part 4 and Police Pension Regulations 2015 Part 13 Chapter 5.