

THE INDUSTRY-WIDE COAL STAFF SUPERANNUATION SCHEME

PRIVACY NOTICE

PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR SURVIVORS

The Trustee of the Industry-Wide Coal Staff Superannuation Scheme (“the Scheme”) needs to collect and use personal information about the Scheme’s members and their survivors. This privacy notice sets out how the Trustee collects, uses and protects your personal information and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

1. PERSONAL INFORMATION

The Trustee holds or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Scheme's employers and information obtained from other sources, including public databases.

2. WHAT INFORMATION MAY BE COLLECTED DIRECTLY FROM YOU?

The categories of personal information that can be collected directly from you include:

- (a) personal details (for example, your name, date of birth);
- (b) your bank details and national insurance number;
- (c) your contact details (for example, your address, phone number and email address);
- (d) details about who you would like the Trustee to consider paying benefits to if you die; and
- (e) your investment choices relating to your benefits.

3. WHAT INFORMATION MAY BE COLLECTED FROM OTHER SOURCES (SUCH AS YOUR EMPLOYER)?

These are examples of categories of information that may be collected from other sources:

- (a) personal details (for example, your name, date of birth);
- (b) your contact details (for example, your address, phone number and email address); and
- (c) information necessary to calculate and pay your contributions or benefits (for example, your employment history and salary).

4. HOW WILL THE TRUSTEE USE YOUR PERSONAL INFORMATION AND WHY?

The ways your information may be used include:

- (a) identifying you and your survivors and making sure your details are up to date;
- (b) communicating with you;
- (c) calculating and paying your benefits;
- (d) making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death; and
- (e) calculating the liabilities of the Scheme.

The Trustee must have a legal reason to use your personal information. This will usually be one of the following:

- (a) to fulfill its legal obligations (including any contractual obligations), which includes making sure that your benefits are paid correctly;
- (b) to meet its legitimate interests to administer the Scheme efficiently; or
- (c) because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given the Trustee information about your health, it may need your consent to process your data. Where this applies, you may take back your consent at any time by contacting the Trustee using the details below.

5. **INFORMATION SHARING**

- 5.1 The Trustee may share personal information with other organisations or individuals including:
- (a) the Scheme's administrators, payroll providers and the Trustee's advisers (for example auditors, medical advisers and legal advisers) and their sub-contractors to facilitate the administration of the Scheme and your benefits;
 - (b) Her Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund; or
 - (c) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes.
- 5.2 The Trustee may also provide some of your personal information to Scheme employer group companies to help them to make decisions relevant to their role as sponsoring employers. The Trustee will only do so to the extent it considers necessary for these purposes.
- 5.3 Alongside the Trustee, the Scheme Actuary and their employer (Aon Hewitt Limited - together "Aon") are also data controllers. Attached as an Appendix to this Notice is an additional Notice relating to Aon's Privacy Notice.

6. **SECURITY AND STORAGE**

The Trustee has measures in place to protect the security of your personal information and keep it confidential. The Trustee reviews these measures regularly to make sure they remain appropriate.

When sharing your personal information with the Scheme administrators or another third party the Trustee will make sure that it also has measures in place to protect the information and keep it confidential and agree to use the personal information only for the purposes agreed.

The Trustee will keep your personal information for as long as it has a relationship with you or your survivors. When deciding how long to keep your personal information after our relationship with you has ended, the Trustee will take into account its legal obligations and regulators' expectations. The Trustee may also retain records to investigate or defend potential legal claims.

7. **YOUR RIGHTS**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. The Trustee may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact the Scheme Administrator using the contact details below.

8. **INTERNATIONAL DATA TRANSFER**

Your personal information may be transferred to, stored, and processed in a country that is not regarded as providing the same level of protection for personal information that would be provided within the European Union. Where your personal information is to be transferred outside the UK (for example by the Scheme Administrator) the Trustee will always make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact the Scheme Administrator.

9. CHANGES TO THIS POLICY

The Trustee may update this privacy notice from time to time. You will be able to see when it was last updated because the Trustee will include a revision date. Updates are effective from the date on which they are notified to members.

10. HOW TO CONTACT US

10.1 The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact the Scheme as follows:

Industry-Wide Coal Staff Superannuation Scheme
Hymans Robertson LLP
20 Waterloo Street
Glasgow
G2 6DB

e- mail: iwcsssadmin@hymans.co.uk
telephone: 0141 566 7660

10.2 If you believe that the Trustee has not resolved your concerns, you can complain to the Information Commissioner's Office at www.ico.org.uk.

10.3 The Trustee encourages you to let us know if your personal information changes or if you think the information held about you is out of date.

Appendix

Notice from Aon Hewitt Limited and the Scheme Actuary

Aon Hewitt Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at

<http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>

or you can request a copy by contacting us, including reference to the scheme name, at:

Data Protection Officer
Aon Hewitt Limited (Retirement and Investment UK)
PO Box 730
Redhill
RH1 9FH