

BRITISH STEEL PENSION SCHEME PRIVACY POLICY

THE BRITISH STEEL PENSION SCHEME

The General Data Protection Regulation (**GDPR**) imposes obligations on those who hold and process personal information and provides data subjects with certain rights.

The Trustee of the British Steel Pension Scheme (**BSPS**) is required to hold personal information relating to you in order to administer the BSPS. GDPR applies to the Trustee in respect of such information. The Trustee is committed to protecting and respecting the privacy of your personal information. This Privacy Policy describes how we treat the personal information we hold about you.

PERSONAL INFORMATION WE COLLECT

We may collect and process the following information about you:

- **Personal information you give us.** You may give us personal information by filling in forms in hard copy or on our website, or by corresponding with us by phone, e-mail, and letter or in person. The personal information you provide may include your name, date of birth, address, country of residence, e-mail address and phone number, sex/gender, marital or relationship status, National Insurance number, evidence of identity (e.g. passport), details of nominees to be considered for benefits in the event of your death, financial information (including details of your salary and other forms of remuneration, contributions paid to the BSPS and bank account information), pension sharing orders, benefit entitlements under the BSPS, and may include medical information.
- **Personal information we receive from other sources.** The other main source of personal information about you is your employer or former employer, who may have provided us with some of the information listed above when you joined the BSPS or may have provided us with updates as that information changed over the course of your employment. In connection with any application for early payment of a pension on the grounds of physical or mental health we may also receive information about you from your doctor or other medical advisers. In addition, we may receive details of the commission or alleged commission of any offence and any court proceedings relating to the commission of an offence impacting the payment of benefits and personal information about you from other pension schemes and pension providers, independent financial advisers, and HMRC.

USES MADE OF THE PERSONAL INFORMATION COLLECTED AND LEGAL BASIS FOR USING DATA

We use personal information held about you in the following ways:

- **Personal information you give to us.** We will use this information:
 - to calculate and administer the benefits payable to and in respect of you under the BSPS;
 - to ensure that content from our website is presented in the most effective manner for you and for your computer (please refer to Appendix A "*Privacy and our website*"); and
 - for the efficient administration of the BSPS and to help us and the sponsoring employer review and manage financial matters relating to the BSPS and the provision of benefits to BSPS beneficiaries, together with our respective advisers.
- **Personal information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of personal information we receive).

The legal basis for us using your personal information is to enable us to comply with our legal obligations as trustee of the BPS, which include paying benefits to you and other beneficiaries in accordance with the rules of the BPS. We also have a legitimate interest in using your personal information to ensure the efficient administration of the BPS and to help us and the sponsoring employer review and manage financial matters relating to the BPS, together with our respective advisers.

In some limited circumstances, we will only collect and use certain special categories of personal information (e.g. health information) with your express consent. We will make clear to you when your consent is needed.

If we are not provided with the personal information about you that we need, it may not be possible for us to provide some or all of the benefits otherwise payable in respect of you from the BPS.

WHOM WE SHARE YOUR INFORMATION WITH

Where the Trustee considers it necessary for the purposes listed above, personal information will be disclosed to certain third parties. Personal information may also be shared with independent financial advisers, annuity brokers, insurers, reinsurers, healthcare practitioners, the sponsoring employer, HMRC, the Pensions Regulator, the Trustee's professional advisers (including lawyers, actuaries and accountants) and any other third parties with whom we are authorised or required by law to share personal information.

In addition, personal information may be disclosed to persons who may be appointed to carry out part of the Trustee's responsibilities, service providers of outsourced services or other agencies/companies who provide services to the Trustee.

Such services may include:

- pension benefits administration (including, amongst other things, services such as actuarial services, risk management, legal advice and administration management or other data processing services);
- pensioner audit checks;
- disputes, complaints and other investigations;
- communication services; and
- tax administration.

The Trustee works with its service providers with whom data is shared to ensure compliance with data protection legislation. Service providers and advisors that are data controllers and/or data processors for the BPS have their own policies in relation to the data protection (please refer to Appendix B "*Third Parties*").

As part of the contractual arrangements between the Trustee and any third-party service provider who processes data on behalf of the Trustee, the service provider is required to maintain appropriate levels of security and compliance with current data protection regulations and only to use personal information as instructed by the Trustee. The Trustee will at all times remain responsible for the processing of your personal information carried out on the Trustee's behalf.

Some of the third parties with whom your personal information is shared may be located outside the European Economic Area (**EEA**) (for example, this may happen if computer servers used by our providers are located or backed up in a country outside the EEA). Under data protection law, we can allow your personal information to be transferred outside the EEA if:

- the country to which your personal information is being transferred has been confirmed by the European Commission to provide adequate protection for personal information; or
- the entity that is holding your personal information has entered into a written contract which requires it to provide all protections to your personal information required by data protection law.

In the event that the UK is no longer part of the EEA, references in this section to the EEA should be taken to mean the EEA and the UK. Further information about transfers of your personal information outside the EEA can be obtained by contacting us using the details provided at the end of this policy.

We may also be required to disclose members' personal information in response to requests from a government agency, court, tribunal, ombudsman or regulator, or otherwise as part of the dispute process.

WHERE WE STORE YOUR PERSONAL INFORMATION

The majority of the personal information for BSPS members is held on our secure servers.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

The Trustee will keep your personal information in accordance with our data retention policy as it applies from time to time. We will need to keep personal information for as long as is reasonably necessary to determine members' entitlements to benefits from the BSPS and to comply with our legal obligations in relation to the administration of the BSPS.

ACCESS TO PERSONAL INFORMATION

For the purpose of the GDPR, the data controller is B.S. Pension Fund Trustee Limited whose registered address is 17th Floor, 125 Old Broad Street, London, EC2N 1AR. We are registered as a data controller with the Information Commissioner's Office and our registration number is **Z8169491**. We can be contacted using the details provided at the end of this policy.

YOUR RIGHTS

You have certain statutory rights in relation to the personal information we hold about you, which we summarise below. Some of these only apply in certain circumstances as set out below and are subject to certain restrictions. We also set out how to exercise those rights. Please note that we will require you to verify your identity before we respond to any of your requests. Under current law¹ we must normally respond to a request by you to exercise those rights within one month (although this may be extended by a further two months in certain circumstances).

To exercise any of your rights, please use the contact details provided below.

Right to be informed	You have the right to be informed about the collection and use of your personal information. This is the purpose of this notice.
Right of access	<p>You have the right to ask what personal information is held about you and to be provided with a copy.</p> <p>If you require more than one copy of the information we hold about you, we may charge an administration fee. We may not provide you with certain personal information if providing it would interfere with another's rights (e.g. where providing the personal information we hold about you would reveal information about another person) or where another exemption applies.</p>
Right to rectification	The accuracy of the information we hold about you is important to us. Under the GDPR, if any personal information held about you is incorrect, you can ask for it to be corrected. If you are requesting a correction, please explain in detail why you believe the personal information we hold about you to be inaccurate or incomplete so that we can assess whether a correction is required. .
Right to erasure	This is also known as the "right to be forgotten"; you have the right to request for your personal information to be removed in certain circumstances, for example where the information is no longer needed.
Right to restrict processing	Individuals have the right to request the restriction of the processing of their personal information in certain circumstances, for example where the processing is no longer necessary.
Right to portability	<p>You have the right to receive a subset of the personal information we collect from you in a structured, commonly used and machine-readable format and a right to request that we transfer such personal information to another party.</p> <p>If you wish for us to transfer the personal information to another party, please ensure you detail that party and note that we can only do so where it is technically feasible. We are not responsible for the security of the personal information or its processing once received by the third party. We also may not provide you with certain information if providing it would interfere with another's rights (e.g. where providing the personal information we hold about you would reveal information about another person or our trade secrets or intellectual property).</p>
Right to object	You have the right to object to the processing of your personal information in certain circumstances.

Please note that, if we are not able to process the personal information about you that we need in order to administer the BSPS, it may not be possible for us to provide some or all of the benefits otherwise payable in respect of you from the BSPS.

¹ As at the date of approval of this Policy.

CHANGES TO OUR PRIVACY POLICY

This policy is subject to regular review and may be updated from time to time. Any changes we may make to our Privacy Policy in the future will be posted on the BSPS website and, where appropriate, notified to you in writing.

CONTACT

Questions, comments and requests regarding this Privacy Policy or our processing of your data can be addressed to **DPO.Requests@bspensions.com** or submitted in writing to:

Data Protection Officer
British Steel Pension Scheme
Ground floor Sentinel
105 Waterloo Street
Glasgow
G2 7BW

Further information about the operation of the GDPR, including details of how to make a complaint, can be obtained at www.ico.org.uk or by telephoning 0303 123 1113.

This Privacy Policy was approved by the Trustee board on **25 November 2020**.

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APPENDIX A: PRIVACY AND OUR WEBSITE

SCHEME WEBSITE – www.bspspensions.com/

With regard to each of your visits to our website we may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

We will use this information:

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer; and
- as part of our efforts to keep our website safe and secure.

Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access.

COOKIES

User activity is monitored.

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APPENDIX B: PRIVACY AND BIOMETRIC DATA

This Appendix describes how we treat personal information provided to us through the “myPensionID” app for the purposes of verifying member identity.

When you verify your identity via the app, you will provide a "live" selfie of yourself and a photograph of your chosen photo documentation (e.g. driving licence or passport). You will also provide certain other information, including that you are a beneficiary of the BSPS, your name and contact details. The service provider, Target Professional Services Ltd (**Target**), may also collect certain unique device identifiers so that they can verify the mobile device on which you have chosen to download the app.

In order to verify your identity, the live photo will be checked against the image of your photo documentation. This may reveal certain special category or biometric personal data. We will use this information to:

- assist with good and efficient administration of the BSPS to help us ensure that our beneficiaries are receiving the benefits to which they are entitled; and
- help authenticate and confirm the identity of beneficiaries of BSPS.

The lawful bases we rely on for processing the personal data that you will provide via the myPensionID app are:

- we have a legitimate interest to ensure the good and efficient administration of BSPS; and
- there is a substantial public interest in the proper administration of pension schemes, including the proper verification of the identity of members and beneficiaries to ensure that they receive the benefits to which they are entitled.

HOW WE PROCESS YOUR PERSONAL INFORMATION

Our use of the myPensionID app allows the identity verification process to be fully automated. It will cross-check the image and details on your photo documentation against your live photo using facial recognition software and the personal information we hold about you (such as your name and address) in order to verify your identity.

In the event that you disagree with the outcome of the verification process through the myPensionID app, you will be able to contact the Trustee, stating the reasons for your objection and providing any supporting information and documentation.

THIRD PARTIES

The myPensionID app service is provided by Target who will process the personal information you provide to it on our behalf. As part of the contractual arrangements, Target is required to maintain appropriate levels of security and compliance with current data protection regulations and only to use personal information as instructed by the Trustee. The Trustee will at all times remain responsible for the processing of your personal information carried out on the Trustee's behalf.

STORAGE OF YOUR PERSONAL INFORMATION

Your personal information will not be transferred outside the EEA. It will be stored by Target for the shorter of:

- (i) The time required to verify the match, and
- (ii) The period until such time as you request its deletion.

YOUR RIGHTS

For details of the rights available to you in respect of the processing of personal information we hold about you, please refer to page 4 of our Privacy Policy.

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APPENDIX C: THIRD PARTIES

Organisation	Data Privacy Policy
Barclays Bank UK PLC Scheme Bankers	www.barclays.co.uk/important-information/privacy-policy/
Corvid Paygate BACS software provider	www.corvid-paygate.com/privacy-policy.aspx
Critiqom Mailing house	www.critiqom.com/wp-content/uploads/2018/02/Critiqom-Privacy-Policy.pdf
HelpIT Mailing house	www.helpit.com/privacy-policy/
Iomart Online backup	www.iomart.com/privacy-policy/
KPMG Auditors	home.kpmg/uk/en/home/misc/privacy.html
PAM Group Medical advice	www.pamgroup.co.uk
Streamline Corporate Printing services	www.streamlinecorporate.com/10-privacy-policy
Target Data verification and member tracing	www.targetprofessional.co.uk/privacy-policy/
Tata Steel UK Limited² Sponsor	www.tatasteeleurope.com/en/disclaimer#75899
Travers Smith LLP Legal advisers	www.traverssmith.com/privacy-policy/
Western Union International Paying Agent	www.westernunion.com/gb/en/privacy-statement.html
Willis Towers Watson³ Actuarial advisers	www.willistowerswatson.com/en/global-website-privacy-notice
Wordshop Scheme Website hosts	www.wordshop.co.uk/wp-content/uploads/2018/05/Wordshop-Data-Protection-Policy.pdf

² Personal information may be disclosed to human resources management staff in the Tata Steel UK Limited group of companies in the UK to the extent that it is relevant to the administration of your pension benefits.

³ As noted, we may share personal information with the actuary to the BSPS. The actuary to the BSPS is a joint data controller with the Trustee when using personal information held in respect of you for the purposes of assessing, with the Trustee, financial matters affecting the BSPS. The current actuary to the BSPS is Gareth Oxtoby of Willis Towers Watson, whose address is: Willis Towers Watson, Watson House, London Road, Reigate, Surrey RH2 9PQ.