

BOOTS PENSION SCHEME

DATA PRIVACY STATEMENT

Background

Boots Pensions Limited is the Trustee (“the Trustee”) of the Boots Pension Scheme (the “Scheme”).

The Trustee holds certain personal information (known as “personal data”) about Scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be personal data (in other words, because the Trustee holds information from which you as an individual can be identified, any information held in respect of you will be subject to certain protections).

For legal purposes, the Trustee is known as the “data controller”, as the Trustee decides the purposes for and the means by which the personal data which it holds is processed.

Aon Hewitt Ltd, and Robert Mellor, as Scheme Actuary, have deemed themselves as Joint Data Controllers because, when performing their role, they determine the purposes for and means by which your personal data is processed. More detail about Aon’s use of your personal information is set out in their full privacy notice which is available at:

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

Similarly, Legal & General Assurance Society Limited (with whom the Trustee has recently entered into a Bulk Purchase Annuity Agreement) and its reinsurers are Data Controllers because they determine the purposes for and means by which your personal data is processed. Their privacy notice, which includes a link to their reinsurers’ privacy notices, is available at:

<http://legalandgeneral.com/prt/privacy-policy>

The principal Data Processor is the Company who acts as the Scheme administrator, but from time to time there will be other third-party providers who will be Data Processors and will have their own data protection policies. The Trustee will ensure that appropriate arrangements are in place with these third-party providers to comply with the provisions of data protection legislation.

Information which the Trustee collects about you

Depending on the circumstances and the stage of your membership, the Trustee may hold some or all of the following information about you:

- Your name and date of birth
- Your gender
- Your marital status
- Your address and other contact details (such as telephone number and email address)
- Your national insurance number
- A copy of your passport (if you are an overseas pensioner)
- Details of your bank account (to pay benefits)
- Medical and other details about your health
- Details about your dependants and/or beneficiaries (including their names and possibly details of their gender)
- Relevant employment information (including current and past salary information and employment dates)
- Details about your pension benefits
- The wishes you have expressed about how the Trustee should distribute any benefits payable on your death

- Your period of membership of the Scheme, your pensionable earnings, and your contributions to the Scheme
- The instructions you have given to the Trustee about how your AVCs are to be invested
- Details of any transfer payments received by the Scheme, or paid out of it, in respect of you.
- Details of any court orders (e.g. on bankruptcy or divorce) of which the Trustee is aware which would affect your right to benefits from the Scheme.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time the Trustee may also need to hold other information about you.

How the Trustee uses that data

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for the Trustee to properly administer the Scheme and to calculate and pay benefits. The Trustee also keeps the above information in order to comply with its obligations towards members under the Scheme governing documents, as well as under relevant legislation. Your personal data will generally be collected directly from you or from your employer.

Personal data relating to the Scheme is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

As part of running the Scheme, the Trustee may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “sensitive personal data”). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “sensitive personal data”. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

Who the Trustee shares the data with

The Trustee is not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

However, as the Trustee needs help from various advisers to properly administer the Scheme, personal data will be shared with the following:

- your current, past or future employer (personal data will not be transferred to a country outside the European Economic Area unless there are adequate measures to safeguard the security of that data)
- the Scheme secretary
- the Scheme’s professional advisers, including the Scheme Actuary, auditor, medical advisers, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee e.g. The Company who acts as the Scheme administrator.
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help the Trustee prepare various communications, such as the annual benefit statement
- The Trustee’s appointed insurance company or companies (and their reinsurers) for the purposes of annuities and additional voluntary contributions

How long does the Trustee keep personal data for?

The Trustee must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, the Trustee must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life.

If the Trustee concludes that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data the Trustee holds about you is inaccurate, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – as the Trustee is relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.
- **Withdrawing consent** – where you have given the Trustee your consent to processing your personal data, you can withdraw that consent at any time by notifying the Trustee (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or the Trustee’s ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

please contact Boots Pensions Limited, Nottingham NG90 7GP. E-mail: group.pensions@boots.co.uk

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with the Trustee, or you believe the Trustee is processing your personal data in a way which is inconsistent with the law, you can

complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113. The Scheme's registration number is Z5257679.

Updates to this notice

This notice is the latest version as at January 2018. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at <https://www.ahb-ukpensionportal.co.uk/>. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).

Keeping your information up-to-date

It is your responsibility to keep the Trustee up-to-date with any changes to your personal information, including your marital status, contact and bank details. Without this information, there may be delays in paying benefits to you or your dependants.

Future developments

As you may be aware, the rules on data protection are changing. From 25 May 2018, the General Data Protection Regulation (GDPR) will come into force in all EU and EEA member states. Despite the UK's intention to exit the EU, the Government has confirmed that the GDPR will apply in the UK from that date. It has announced a UK Data Protection Bill which is expected to incorporate the GDPR into UK Law and replace the Data Protection Act 1998. The Trustee will update the privacy notice as appropriate once full details of the UK legislation are known.

November 2023