

## **PRIVACY NOTICE FOR THE CLARKSON PLC PENSION SCHEME (the “Scheme”)**

The Trustees of the Scheme hold and process personal data about you and other beneficiaries in the Scheme in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

### **What we do with your data**

As a data controller, the Trustees collect and process your personal data for the purposes of complying with their legal duties to administer the Scheme and for other legitimate purposes relating to the operation of the Scheme. These include: the calculation, administration and payment of benefits under the Scheme before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, investment of the Scheme's assets and dealing with any queries or complaints regarding benefit entitlements.

Whilst much of the data we hold has been provided by you, we also hold and process data provided by Clarkson PLC and other Group companies (the “Company”), HMRC, the DWP and regulatory bodies and by tracing organisations. We also receive information from you about proposed beneficiaries, who may be eligible to receive benefits on your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this Privacy Notice with them.

The data we hold is to assist the Trustees to calculate and pay the benefits the members are entitled to and this includes name, address, salary, years of service with the scheme, current pension, date of birth, NI number and contact details.

We also hold some special categories or “sensitive” data about members for the purposes of administering the Scheme (for example in relation to ill-health or death benefits, or data obtained under the Scheme's Internal Dispute Resolution Procedure). We will, in most circumstances, process this data as is necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). We may also, typically when considering claims under the Scheme's Internal Dispute Resolution Procedure, if there are any occasions where we seek your explicit consent to process your sensitive data, then you can withdraw it at any time.

### **Who else processes your data?**

We may share your personal data with certain third parties, for example, Isio and Fidelity, as the Scheme Administrators and the Scheme Actuary and/or CMS, our legal advisers; the Company; the Company's pension consultant; the Scheme's auditor; AVC providers, insurance providers, investment advisers, investment managers; a retirement service company and annuity provider; and/or other regulatory bodies, for example, HMRC, the Pensions Ombudsman, the Pensions Regulator, and the Money and Pensions Service (note this list is not exhaustive).



In some circumstances we are joint controllers with the Scheme Actuary, the legal advisers (who will process personal data to comply with their professional duties as advisers to the Trustee) and the Company. The Company holds personal data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in a cost effective way and may have an interest in offering certain options to members. The Trustees will share information with the Company and its auditors and advisers for this purpose.

The Company and other advisers will from time to time transfer data to other countries, including outside of the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

We, and Fidelity as our administrator, may process your data for a number of reasons in our legitimate interests including, but not limited to, for the purposes of providing a consistent and integrated service to you, if you hold multiple accounts with the Fidelity group, and to increase member engagement, for example to encourage members to be more aware of their holistic financial needs.

We may also share your information with Fidelity group companies or their agents in order:

- to administer the Scheme, service your accounts and carry out our legitimate interests;
- to update the information kept for any other schemes of which you are a member and for any other accounts for which Fidelity or other Fidelity Group companies hold records on its database, where you provide us with updated information such as address details; and
- at your request only, to provide improved services of the accounts you hold with the Fidelity group, including reporting to you.

### **Storage of your personal data**

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Isio and Fidelity, (and Aviva, the previous Scheme administrators), will hold on to your personal data for at least 15 years after the termination of the contract with us. This is to protect themselves against any subsequent legal claims.



### **Your rights**

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

### **Contact details**

If you have any questions about this Notice, please contact Nav Makhan - Pensions and Benefits Manager on:

T: +44 7436 209 226

Email: [nav.makhan@clarksons.com](mailto:nav.makhan@clarksons.com)

### **What if you have a complaint?**

To make a complaint about how we've handled your information, contact us as set out above.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

T: 0303 123 1113