

# PRIVACY NOTICE FOR THE JOHN GRAHAM (DROMORE) PENSION AND LIFE ASSURANCE SCHEME

The Trustees of the John Graham (Dromore) Limited Pension and Life Assurance Scheme (“the Scheme”) hold and process personal data about our members and their beneficiaries in order to run the Scheme. In doing so, we comply with the General Data Protection Regulation and other relevant UK legislation. The Trustees are a data controller in their own right and, in addition, will be a joint data controller with the Scheme Actuary, Mark McClintock, and also Legal and General (“L&G”) in respect of personal data that is processed jointly. This notice is issued on behalf of both the Trustees, the Scheme Actuary and L&G.

We describe in this Notice the personal data which we collect about you and other individuals (for example, your spouse or beneficiaries), what your personal data is used for, and what your rights are. Personal data is described in legislation as any information relating to an identified or identifiable individual.

## What is your personal data used for?

The Trustees and L&G collect and process your personal data for the purposes of complying with their legal duties to administer the Scheme and for other legitimate purposes in relation to the ongoing operation and management of the Scheme. This includes:

- Communicating with members in relation to their benefits, responding to requests and queries;
- General administration of the Scheme, including calculating, recording and paying benefits;
- Meeting the Trustees’ ongoing regulatory, legal and compliance obligations;
- Risk management purposes such as longevity modelling, managing Scheme assets, insurance solutions, member option exercises (including pension increase exchange and transfer value exercises);
- Improving our processes and use of technology, including testing and upgrading of systems.

The Scheme Actuary, Mark McClintock, processes your personal data to undertake various tasks, primarily around scheme funding.

## What personal data do we hold?

We may collect, use or otherwise process the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependant:

- name, gender, address, date of birth, NI number, contact details;
- bank account details and tax information in relation to your pension benefits;
- information about your membership of the Scheme (for example service dates and benefit amounts);
- information about any other pension arrangements you have.

The Trustees may also hold some special categories of personal data for the purposes of administering the Scheme, for example in relation to ill-health or death benefits.

Where we hold special categories of personal data, we will explain to you at the time why we need it and how the information will be used. We will only process special categories of personal data where we need to do so to establish a right to a benefit. Should legislation require us to obtain your explicit consent to continue to do this, we will seek your consent at the appropriate time.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by John Graham Construction Limited, a family member (if they choose to nominate you for the death benefits that may be due on their death), persons acting on your behalf and other organisations, such as HMRC, DWP, other pension schemes, regulatory bodies and tracing organisations.

We also receive information from members about their beneficiaries, who may be eligible to receive benefits on the member’s death.

## Who do we share your information with?

To comply with our legal duties and for the purposes of Scheme administration, the Trustees may share your information with:

- The Scheme’s administrator who process information to run the Scheme;
- The Scheme’s professional advisors, including the Scheme Actuary, auditor, legal advisor, and any other financial advisor or other organisation appointed to advise you in regard to your options under the Scheme;
- The Scheme’s insurers and annuity providers, investment managers, banks or other service providers;
- The Company and their professional advisors;
- Statutory and regulatory bodies, including but not limited to HMRC, DWP and tracing organisations; and
- Any other person who is authorised to act on your behalf.

As Trustees, we are a 'data controller' of your personal data which means that we are responsible for keeping your data safe and secure. Some of the third parties with whom we share your personal data are limited (by law and contract) to using your personal data in certain ways specified by us. They are known as 'data processors' and this includes the Scheme's administrator and L&G.

### **What is our lawful basis for processing your personal data?**

Under data protection legislation, we need to have a lawful basis each time we use, share or otherwise process your personal data.

The Trustees have certain duties and powers which are conferred on it by law or by the Scheme's Trust Deed and Rules. In most cases, the processing of your personal data is necessary so that the Trustees can perform those duties and exercise those powers (for example, to pay your benefits).

Certain uses of your personal data, or other processing activities, may not be strictly necessary for the Trustees to perform their legal duties and regulatory responsibilities, or to exercise its powers. However, it may be that certain uses of your personal data are necessary for the purposes of the Trustees' legitimate interests.

When we say "legitimate interests", we mean the Trustees' interests in operating the Scheme as properly, efficiently and securely as possible. For example, to manage matters associated with the provision of your benefits under the Scheme, including offering you choices as to the form or timing of those benefits.

The Scheme Actuary is appointed under pensions legislation and will use your personal data to undertake various tasks, primarily around scheme funding.

### **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 personal data about our members and their beneficiaries until after their membership of the Scheme ends, and for such longer period as is necessary to enable us to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

In certain circumstances your personal data may be processed outside of the UK and the EEA for example by our third party service providers. Countries in the EEA have been deemed to have an adequate level of protection for the processing of personal data by the Secretary of State in the UK. We do not generally, and have no intention to, transfer or process the personal data that we collect about you outside the EEA. Should your personal data be transferred by us or our service providers for processing outside the EEA it will be subject to appropriate safeguards for the security of the data:

- on the basis of an adequacy decision that the third country ensures an adequate level of protection for the personal data; or
- subject to appropriate contractual safeguards (model clauses or binding corporate rules, as permitted by UK data protection laws).

Further details on the steps we take to protect your personal data in these cases are available from us on request by using the contact details below.

### **Your rights**

You have the right to request a copy of your personal data or require that we rectify any errors in the data that we hold.

In some circumstances, you can also require that we erase your personal data, 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.

If you wish to exercise any of these rights, please contact us using the details provided later.

If in the future we request and obtain your consent, 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.

### **How do we keep your personal data secure?**

The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons, we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to take all reasonable precautions to safeguard the confidentiality of personal data.

Although we make every effort to protect the personal data you provide, the transmission of information over the internet is not completely secure. As such, you acknowledge that we cannot guarantee the security of personal data transmitted to us in this way.

Once we have received your personal data, we will use appropriate procedures and security features to prevent unauthorised access, and take steps to ensure that any third parties with whom we share personal data do the same.

### **Contact details**

If you have any questions about this Notice or would like to exercise your rights in respect of your data, please contact our pension administration team using the following contact details:

Isio c/o SPS  
PO Box 4916  
Interface Business Park  
SN4 4RX

+44 333 016 5304  
johngraham@isio.com

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

If you would like to make a complaint about how we have handled your information, please contact us using the details provided above.

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

Address: Information Commissioner's Office ,  
Wycliffe House, Water Lane, Wilmslow, Cheshire  
SK9 5AF

0303 123 1113

### **Changes to this privacy notice**

The data controllers may change this Notice from time to time and we will notify you of any changes the next time we communicate with you, such as in the Summary Funding Statements that are issued on a regular basis.

This privacy notice was last reviewed and updated in March 2024.