
Data Privacy Notice

Background

This statement sets out how Dalriada Trustees Limited ("Dalriada") in its capacity as Trustee of The Audax Pension Trust handles personal information in compliance with the General Data Protection Regulations (the "Regulations").

We recognise that the correct and lawful processing of personal data is important and integral to our successful operations and to maintaining the trust of the people we deal with. We fully endorse and adhere to the principles set out under the Regulations.

For the purposes of this statement, the term "personal data" shall refer to personal data and sensitive personal data.

Dalriada may act as Data Controller and a Data Processor in relation to the handling of the personal data and sensitive personal data of the persons/organisations we deal with.

Purpose and legal basis for processing the personal data

The personal data that Dalriada may hold includes, but is not limited to, your name, address, date of birth, National Insurance details and marital status, as well as details of your children or other beneficiaries. Where we have it, we may also hold details of your salary history, membership dates and any contributions to your pension scheme. In addition, we may retain your medical history, as this may affect your pension entitlement.

The reason we need to hold and process this data is so that we can properly administer your benefits and pay your pension and other benefits when they are able to come into payment.

Dalriada may from time to time share this data with a regulatory body or a professional adviser to the scheme, in order to manage the Scheme and your benefits. Dalriada may also share the personal data with insurers to ensure that we provide your benefits in the most cost-effective way.

As Data Controller, Dalriada has a legal obligation to administer and pay your benefits from your scheme when it is able to do so. We will therefore hold and process your data on this legal basis. Dalriada and our advisers have each our own legitimate interests for processing your data. You may object to the processing of your personal data on this basis, but your objection may be rejected by Dalriada if there are compelling reasons to do so.

When Dalriada is required to process your sensitive personal data, such as your medical records, we shall seek your explicit consent to do so. You may withdraw your consent to processing on this basis at any time.

Dalriada will hold and process your data for as long as we are legally required to do so, are responsible for payment benefits from the scheme or for protection of our legitimate interests, and in line with regulatory requirements. As pension benefits are a long-term undertaking and queries can arise many years into the future, it is not possible to give a specific period for which the data will be stored.

Individual Rights

Dalriada will fully respect your rights under the Regulations including:

- You have the right to make a subject access request for free, which can be made electronically
- You have the right to make a subject access request to verify the lawfulness of the processing we are carrying out
- We will respond to your subject access request within one month of you making it
- You can request to correct your personal data if it is inaccurate, incomplete or out of date, or request the deletion of your personal data
- You may obtain a copy of your personal information from us, except in limited circumstances
- You have the right to complain to the supervisory authority whose contact details are set out below.

Complaints

Complaints relating to breaches of the Regulations and/or complaints that an individual's personal data is not being processed in line with the Data Protection Principles will be managed and processed by Dalriada, as trustee.

All complaints of dissatisfaction will also be processed in accordance with your scheme's Internal Dispute Resolution Procedure (IDRP) and should be sent to:

Trustees of the Audax Pension Trust
Linen Loft
27-37 Adelaide Street
Belfast, BT2 8FE

Without prejudice to any administrative or judicial remedy, you have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office (ICO), if you consider that the processing of your personal data infringes the principles of the Regulations. Their address is as follows:

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