

Data Privacy Notice

Background

This statement sets out how Dalriada Trustees Limited ("Dalriada") in its capacity as Trustee handles personal information in compliance with Data Protection Legislation.

"Data Protection Legislation" means all applicable data protection and privacy legislation in force from time to time in the UK including, to the extent the EU GDPR applies, the General Data Protection Regulation ((EU) 2016/679); to the extent the UK GDPR applies, the law of the United Kingdom or of a part of the United Kingdom, which relates to the protection of personal data, including the Data Protection Act 2018; any other legislation relating to personal data and all other legislation and regulatory requirements in force from time to time which apply to Dalriada relating to the use of Personal Data.

For the purposes of this statement, the term "Personal Data" means personal data and sensitive personal data.

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 Data Protection Legislation.

If you are an individual or part of an organisation that we deal with in our capacity as Trustee, Dalriada may act as Data Controller and a Data Processor in relation to the handling of your personal data.

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 nominated 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 a pension 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.

Dalriada will hold and process your data: for as long as we are legally required to do so; for as long as we are responsible for payment benefits; for the 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 Data Protection Legislation including:

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- the right to request the correction of your personal data if it is inaccurate, incomplete or out of date, or to request the deletion of your personal data;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

More information may be obtained <https://ico.org.uk/>

Complaints

Complaints relating to breaches of the Data Protection Legislation 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:

Dalriada Trustees Ltd
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