

Privacy Notice

Data Protection - How we use information about you

We, the Trustee of the Electricity North West Group of the ESPS will use your personal details to assess, deal with, secure and pay any benefits you may be entitled to under the rules of the Electricity North West Group of the ESPS.

As part of the service we provide we may share your information with other organisations for the purposes of identifying accurate information as to your whereabouts or for the purpose of paying any benefits that you may be entitled to. We will handle your data in compliance with all relevant data protection legislation, including from May 2018 in compliance with the General Data Protection Regulation (GDPR). The Trustee of the Electricity North West Group of the ESPS is the data controller in respect of your personal information for the purposes of applicable data protection legislation.

Purpose of using information

We process information or data for the reasons/purposes above. This information may include:

- personal details
- family, lifestyle and social circumstances
- financial details
- employment and education details
- goods or services provided

We may also need to process sensitive classes of information, such as physical or mental health details, in order to administer ill-health retirement payments and applications.

This information may be obtained from your employer, ex-employer, government agencies, service providers or from yourself.

We will only collect and use your personal information where:

- there is a legal obligation for us to do so;
- it is for our legitimate business interests; or
- you have given us your consent to do so.

Our legitimate business interests include fulfilling our role in dealing with, assessing eligibility for, securing and paying any benefits you may be entitled to. We will not use your data for our legitimate business interests if they are overridden by your interests, rights or freedoms.

You do not have to provide the information requested from you, but there may be a delay in the payment of your benefits if that information is not provided.

If we are processing your data on the basis of your consent you can withdraw your consent at any time by contacting Railpen (details shown under further information). The withdrawal of consent will not affect the processing of personal data carried out before consent was withdrawn.

Who the information may be shared with

From time to time we may need to share your information with other organisations. Where this is necessary we are required to comply with all aspects of relevant data protection legislation.

Your information will be shared with Railpen in order for them to provide pension administration services in line with the reasons/purposes outlined above.

The types of other organisations we may need to share some of your information with are:

- claimants, beneficiaries, assignees and payees
- pension schemes with which the person whose personal information we are processing has an association
- trade and business associates and professional advisers
- healthcare, social and welfare organisations
- financial organisations and advisers
- central and local government ombudsmen and regulatory authorities
- suppliers
- family, associates or representatives of the person whose personal data we are processing
- tracing agencies
- service providers

One of the service providers with whom your information may be shared is the actuary appointed to advise the trustees. Because of the type of work the actuary does, they are required to give you details of how they treat your information – a summary is appended to this notice.

We may also share information with:

- insurers or re-insurers providing services for the purpose of liability and risk management exercises: and
- annuity providers for the purposes of providing you with an example annuity quote at retirement. In doing so, the Trustee may pass information that is deemed to fall under the “special category of information” category, and will do so in reliance on a public policy condition in the Data Protection Act 2018. Please see the latest version of the Trustee’s Data Protection Policy at <https://www.enwlpensions.co.uk/about-the-scheme/privacy-and-data-protection> for further information.

Retention of data

One of the key principles of the relevant data protection legislation, including the GDPR, is that the personal data we store and process shall be adequate, relevant and limited to what is necessary for the purpose it was originally collected. Our standard policy is for information or data to be kept for only as long as necessary. It is then disposed of in a managed and secure way. However, as pensions are a long term saving vehicle it may be necessary to retain your personal data for the remainder of your life and any dependants’ lives in order to pay you the benefits you are entitled to along with any dependant’s benefits payable.

Our core systems, data, and administration services are all carried out and stored within the UK.

Completing forms on behalf of a child

If you are completing forms, on behalf of a child we may also hold and use your personal information, which will be dealt with on the same basis as set out above.

Your rights

You will have a number of rights under data protection legislation. These include the right to:

- see the information we hold about you;
- request personal data to be amended if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued use;
- to block or restrict the processing of your personal data in certain circumstances; and
- object to the processing of your personal data in certain circumstances

There is also a right under the GDPR to receive your personal data (in a structured, commonly used and machine-readable format) and to transfer your data to another service provider or data controller. This right applies where your data is being processed on the basis of your consent or in line with a contract to which you are party. Please note that for the majority of members, this is not applicable as we rely on our legitimate business interest to collect and process your data rather than individual consent or contracts.

Further information

If you wish to exercise any of your rights or have concerns about the processing of your personal data or, on behalf of the child in whose name this claim is made, or wish to raise any issues in relation to data protection, including in relation to the use of it by the Trustees or Railpen, please contact the Trustees on the following details:

Defined Benefit (DB) members:

Electricity North West (ESPS) Pensions Trustees Limited
C/o Railpen
2 Rye Hill Office Park
Birmingham Road
Coventry
CV5 9AB

Tel: 02476 472 544

Email: enquiries@railpen.com

If you are unhappy with how your personal information is being handled you also have the right to make a complaint to the Information Commissioner's Office, an independent body set up to uphold information rights, which will investigate your complaint. Their helpline number is 0303 123 1113.

Updates to this notice

This notice is the latest version to take effect from 1 October 2023. This notice will be updated from time to time and you can see the current version on the pensions website at www.enwlpensions.co.uk . Alternatively, if you would prefer to receive a hard copy of the notice in the future, please contact the Pensions Team on the following details:

Tel: 0843 311 4530

Email: pensions@enwl.co.uk

Appendix A

Scheme Actuary - Aon Solutions UK Limited "QUICK READ" Privacy Notice

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which they use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

Aon may pass your personal information to third parties such as financial advisors and benefits providers, insurers, their affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in their full Privacy Notice. We recommend that you review this notice which is available online at [Aon Solutions UK Limited Privacy Notice](#), or you can request a copy by contacting Aon, including reference to the scheme name, at:

Data Protection Officer

Aon Solutions UK Limited (Retirement and Investment UK)

PO Box 730

Redhill

RH1 9FH

RI.UK.PrivacyChampions@aon.com