



Macmillan Cancer Support Pension Scheme Privacy Notice

Introduction

This notice explains how the trustees of the scheme use and protect the personal information that they hold about members and other beneficiaries of the scheme. You should share this notice with your family and dependants where you have provided us with personal information about them.

The identity of the individual trustees change from time to time, but you can find out the names of the current trustees and contact them by using the contact details at the end of this notice.

The trustees' role

The trustees of the scheme hold certain personal data about you as a scheme member, and about your spouse or civil partner, dependants and/or other potential beneficiaries (if any). Personal data is information that can be used to identify a living individual. The trustees take the privacy of your data very seriously and are committed to respecting your data protection rights.

The trustees hold this information because it is needed to administer the scheme. Without this information, we cannot provide you and your dependants with the correct benefits, at the right time.

Information the trustees hold about you

We aim only to collect and hold information about you which is necessary to run the scheme. The types of personal data we collect and hold could include your current and former names; contact details; date of birth; gender; National Insurance number; details of current and previous spouse, civil partner, dependants and/or other potential beneficiaries; bank account details; employment history; salary; tax code; pensions' contributions; details about who you would like us to consider paying benefits to if you die; copies of your birth, marriage, civil partnership and/or death certificates, and passport identifier pages and any decree absolute; court orders such as pension sharing, earmarking and attachment orders; your choice of additional voluntary contributions fund (if any) to be paid into; and other personal information collected on joining the scheme or during your membership.

Data is generally collected from you or Macmillan Cancer Support (MCS) but also from other sources, including previous employers, tracing agencies and official databases such as HMRC and the DWP.

Some of the data you disclose to us may be sensitive data, such as information about your physical and/or mental health so we can consider paying certain benefits. We are usually required by law to obtain your explicit consent to collect and hold sensitive data, and you may take back your consent at any time by contacting the scheme administrators.

When you provide personal information about your spouse, civil partner, dependants and/or other potential beneficiaries, we assume you do so having shared this notice with them and with their full knowledge and consent.

How the trustees use personal data

Unless you consent to us holding and processing your personal data, we must have another legal reason to hold and process it. This will usually be to:

- fulfil our legitimate interest in properly administering the scheme and calculating and paying your benefits, including tracing you and other beneficiaries; establishing your identity and eligibility for benefits; internal record-keeping; calculating and reconciling contributions; communicating with you about your benefits and the scheme in general; dealing with any queries about benefits or options under the scheme; preparing scheme accounts and assisting the scheme's auditors; carrying out actuarial, statistical and financial modelling calculations in connection with scheme funding and investment matters; running mortality and address checks against member records to ensure information is correct and to prevent and detect fraud; managing risk, including the insurance or management of risks or of the scheme's benefits and obtaining quotations for annuities and other insurance products;
- comply with our legal and/or contractual obligations, for example under the scheme's trust deed and rules; government legislation; applicable voluntary codes; any relevant industry rules and regulations; and any contracts we have entered into, including to secure your benefits or relating to a merger or reorganisation of MCS; or
- comply with demands or requests made by law enforcement or tax authorities or relating to any disputes, legal claims or litigation.

Who the trustees share your personal data with

Your information may be shared with and processed by the various entities who help us to properly administer the scheme, including for example: MCS and its auditors; the scheme secretary; the scheme administrators; the scheme actuary and actuarial advisers; the scheme auditor; the scheme fiduciary manager; the scheme lawyers; other professional advisers to the trustees; banks and payroll providers; additional voluntary contributions providers; insurance companies; printers and distributors of documents; tracing agencies; and regulators and government bodies (including potentially HMRC, the Pensions Regulator, the Pension Protection Fund and the Pensions Ombudsman) – see the scheme's latest annual accounts for the identities of our key advisers.

The scheme actuary and actuarial advisers (currently First Actuarial LLP), the scheme lawyers (currently Pinsent Masons LLP) and scheme auditors (currently BDO LLP) act as a controller or joint data controller for the personal data they use. This privacy notice also covers them. These scheme service providers use your personal data when advising the trustees and carrying out their respective professional obligations. MCS may also sometimes act as a controller or joint data controller.

The scheme's service providers listed above and/or MCS may also share personal data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services. The scheme actuary and actuarial advisers share data with MCS's auditors for the purpose of the MCS audit.

Please note that some of the scheme's service providers may continue to hold information about you for their own record keeping purposes once they have ceased to be involved with the scheme.

We may also pass personal information to other third parties at your request - for example, where you are considering a possible transfer and you have asked us to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation we

will assume that you have satisfied yourself that the third party has suitable data protection and security measures in place.

Your personal data is not usually transferred, stored or processed outside the UK.. If you live or work outside the UK, we may need to transfer your data outside the UK to respond to any queries that you may have. Data may also be transferred outside the UK where the scheme's service providers host data outside the UK. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. These transfers will be governed by the data protection laws. These allow data to be transferred outside the UK to a country which the UK government considers ensures an adequate level of protection of personal data. These "adequacy regulations" currently apply to a number of countries, including countries within the European Economic Area. If there are no adequacy regulations in place, we may only transfer your data if there are adequate safeguards and if you would have enforceable legal rights and effective legal remedies in respect of your data. You can contact us if you would like more information about these safeguards.

Your personal data is not used to carry out any automated decision-making; or used or shared for marketing purposes.

Security of your personal data

Your personal data is held on paper and on computer systems. We have in place measures to protect the security of your personal data and keep it confidential, which we review regularly to make sure they remain appropriate. When sharing your data with third parties, we make sure they have similar measures in place and agree to use your data only for the purposes we set out.

How long the trustees hold your personal data for

We will keep your personal data for at least as long as we have a relationship with you or your dependants. This means that, if you are entitled to benefits under the scheme, we will hold personal data until your death and, if death benefits are payable, we will hold it until they cease to be paid. After this, or if you transfer your benefits out of the scheme, we may keep your personal data indefinitely in case any future queries or claims arise. When deciding how long to keep your data, we consider our legal obligations and regulators' expectations. When no longer needed, your personal data will be securely destroyed.

The scheme actuary, actuarial advisers and administrators will also keep a copy of the information they hold. Should we change our scheme actuary/actuarial advisers/administrators, they will retain a copy of the data in line with their data retention policy, which is currently for a minimum of one year and a maximum of seven years. The scheme's other professional advisers and MCS will also keep data in accordance with their own data retention policies.

How you can access your personal data and contact details for further information

You have the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. If you would like to discuss or exercise any of these rights, or if you have a complaint about the way your personal data is being held or processed or would like further information about how your personal data is used, please contact the scheme administrators:

By post: Macmillan Scheme Pensions Administration Team, First Actuarial LLP, Network House, Basing View, Basingstoke, Hampshire RG21 4HG.

By email: basingstoke.admin@firstactuarial.co.uk FAO: Sudha Anthony and Nadine Slegg

By phone: 01256 297700

We will aim to respond to any request received from you within one month from your request. Access to your personal data will usually be provided free of charge, although in certain circumstances we may make a small charge where entitled to do so under the data protection laws.

Complaints

If you are not happy with the way in which your personal information is held or processed, please contact us using the details above. You also have the right to complain about data protection matters to the Information Commissioner's Office (ICO).

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113.

Changes to this privacy notice

We may at any time change this privacy notice. Updates will be effective from the date on which they are notified to you or posted on MCS's website. This privacy notice was last updated on 2 November 2021.