

PRIVACY NOTICE FOR THE ALFA LAVAL LIMITED PENSION SCHEME (THE “SCHEME”)

The Trustees of the Scheme holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation. Due to new laws which were introduced in May 2018, we are required to send this notice to you to explain how we use your data.

What We Do with Your Data

As a data controller, we collect and process your personal data for the purposes of complying with our legal duties to administer the Scheme. These include: calculations, administration and payment of benefits under the Scheme (before or after your death), processing ill-health retirement claims, carrying out actuarial valuations, investment of the Scheme’s assets, or dealing with any queries or complaints regarding benefit entitlements. The legal basis for us processing data in this way is that it is necessary for us to comply with our legal obligations as Trustees, and our other legitimate interests such as the efficient management of the Scheme. We also process personal data for other legitimate purposes relating to the operation of the Scheme, for example purchasing insurance policies in respect of members’ benefits or de-risking exercises.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by the Scheme’s Principal Employer, of Alfa Laval Ltd (the “**Employer**”). We also hold and process data provided by legacy pension schemes from which members have transferred into the Scheme, as well as HMRC, the DWP, regulatory bodies and tracing organisations. We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member’s death. Where you provide us with information about your proposed beneficiaries, we assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals.

The data we hold is to assist us in calculating and paying the benefits the members of the Scheme are entitled to and this will include your name, address, salary, years of service with the Scheme, date of birth, NI number, contact details, including telephone number, mobile number and/or email address, details of any pension sharing orders made on divorce, financial information, such as bank account details, and pension entitlement, marital status, employment/ retirement status, and start date and leave date of membership with the Scheme.

We also hold some special categories or “sensitive” data about some members for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will typically only do so with your explicit consent. Where we are relying on your consent to process your sensitive data, you can withdraw it at any time. Where it is not possible or practical to get consent (for example in serious ill-health cases) then we will only hold your personal data where it is necessary for us to do so in order to properly decide what benefits are payable.





Who else Processes Your Data?

We share your personal data with certain third parties involved in running the Scheme, for example, Quantum Advisory who are the administrator with effect, the Scheme Actuary (Quantum Advisory), the Trustees' legal advisers (Osborne Clarke), the Scheme's auditors (CLA Evelyn Partners Limited), investment advisers (Lane Clark & Peacock LLP), independent professional Trustee (ndapt LTD), investment managers, tracing organisations and the Trustees' bank account providers. We also share data with regulatory bodies such as HMRC, the Pensions Ombudsman and the Pensions Regulator. If you have paid Additional Voluntary Contributions (AVCs), the AVC provider will also process your data.

In some circumstances, we are "joint controllers" with each of the Scheme Actuary, the legal advisers (who may process your data to comply with their professional duties as advisers to the Trustees) and the Employer. The Employer holds your data to comply with its legal obligations as the sponsoring employer of the Scheme. The Employer has a legitimate interest in the Scheme being run efficiently and may have an interest in offering certain options to members. We will share information with the Employer and its auditors and advisers for this purpose.

The Employer, the Scheme's administrator and other advisers may from time-to-time transfer data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

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 information relating to you until your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

The Scheme's administrators will hold on to your personal data for 6 years after the termination of the contract with us. This is to protect themselves against any subsequent legal claims.

Your Rights

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we 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. The Trustees are obliged to permit portability in circumstances where we have obtained consent, or we are relying on a contractual obligation only. You can exercise your rights by contacting the Scheme's administrator, Quantum, at: AlfaLaval@gallp.co.uk or on telephone number 01494 927 899. Where we have requested and obtained your consent to process particular information, 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.

As a Data Subject you (or someone else on your behalf) can exercise your right of access to know what Personal Data is held about you, its origins and how it is used.



If you believe that the Personal Data we hold about you is inaccurate, you can request to have it the data to be updated, rectified, supplemented or deleted.

You can instruct the Scheme to restrict the processing of your Personal Data in certain circumstances, for example, whilst an accuracy issue is being resolved.

You can object to your Personal Data being processed, although the Trustees can override this objection in specific instances.

Where you have given us your consent to processing your Personal Data, you can withdraw that consent at any time by notifying us.

You can request that your Personal Data is deleted altogether.

You have the right to complain about how we use your data to the Data Controller (the Trustees). The process for making a complaint is detailed within our Data Protection Complaints Procedure. Should we be unable to resolve your complaint you can escalate to the Information Commission. If you wish to raise a complain contact details are provided at the end of this notice.

Contact Details

The contact details of the Trustees are:

c/o Quantum Advisory. The contact details for Quantum are: AlfaLimited@gallp.co.uk or on telephone number 01494 927 899.

What if you have a complaint?

To make a complaint about how we've handled your information, contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information 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

Telephone number: 0303 123 1113 or 01625 545 745