

Privacy Notice

Introduction

The Scottish Episcopal Church Pension Fund is committed to protecting the privacy and security of personal information entrusted to us.

This Privacy Notice sets out how we as a data controller collect and use personal information about you during and after your relationship with us, in accordance with data protection legislation, including the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018.

We may change this Privacy Notice from time to time. Please check this policy frequently to ensure you are aware of the most recent version and the date that it was last updated.

This policy was last updated in March 2025.

If you have any questions regarding this policy or about our privacy practices, please contact us at: neilw@scotland.anglican.org or by writing to us at the Scottish Episcopal Church Pension Fund, 21 Grosvenor Crescent, Edinburgh, EH12 5EE and marking your query for the attention of the Pensions Officer.

Who are we?

When we say 'we' or 'us' in this Privacy Notice, we are referring to the Trustees of the Scottish Episcopal Church Pension Fund, with our principal office at 21 Grosvenor Crescent, Edinburgh, EH12 5EE.

We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

In order to run the Fund for our members effectively, we appoint a Scheme Actuary to calculate the value of the Fund's assets and liabilities based on its membership profile and to set employer contribution rates based on that information. The Scheme Actuary may need to use your personal data in relation to instructions from the Trustees of the Scottish Episcopal Church Pension Fund or where the processing relates to their statutory or regulatory obligations. Generally, when the Scheme Actuary is using your personal information in connection with the provision of these actuarial services, the Trustees of the Scottish Episcopal Church Pension Fund and the Scheme Actuary will be joint data controllers of your personal data. This means that Trustees of the Scottish Episcopal Church Pension Fund and the Scheme Actuary jointly determine how we hold and use personal information about you. However, in limited circumstances the Scheme Actuary may be a data controller in his/her own right. In such circumstances, your personal information will only be used in connection with the provision of these actuarial services or in connection with the Scheme Actuary's statutory or regulatory obligations.

Where the Scheme Actuary is acting as a joint data controller or data controller in his/her own right in the provision of actuarial services, when we say 'we' or 'us' in this Privacy Notice we are also referring to the Scheme Actuary.

Who is this Privacy Notice for?

This Privacy Notice is for:

- active, deferred pensioner and pensioner members of the Fund (including ex-spouse participants, and those in receipt of dependants' or spouses' pensions);
- former members/pensioners with no further entitlement under the Fund;
- non-members who will or may receive benefits from the Fund (for example, on the death or divorce of a member), who have received benefits from the Fund and have no further entitlement, or who have submitted enquiries;
- current and former advisers, service providers and trustees.

What kind of information do we hold about you?

We may collect, store, and use the following categories of personal information about you:

- Personal details such as name; membership/reference number; address (including former addresses); contact details (including telephone numbers and e-mail addresses); date of birth; gender (including details of any gender recognition certificate); marital status (including divorce details if, for example, benefits form part of a divorce settlement); family members; beneficiary

nominees; Passport or identification card details; birth/adoption certificate details; and death certificate details.

- Employment records including employment history, information regarding periods of pensionable service (including periods of absence), previous salary data.
- Ministry records including term of ministry, congregations served.
- Financial details including your bank account details; salary information; tax and National Insurance information.
- Pension information including defined benefits contributions (contributions paid to the Fund, relating to defined benefits, by or on behalf of a member); defined benefits, whether actual or potential, paid or payable to or in respect of a member; additional voluntary contribution account information; contracting-out records; and death benefit distribution information (including expression of wish forms and information required to assess eligibility for, or allocation of, benefits to potential beneficiaries).

If you are a trustee or former trustee we may hold personal data in your capacity as a trustee including name, address, contact details, passport or identification card details, information relating to actual or potential conflicts of interest.

If you are an adviser or service provider we may hold personal data in relation to the provision of services to us including name, address, contact details and bank account details.

Special Categories of Personal Data

We may also collect, store and use information about your health (for example, information about any disability or medical condition), your sexual orientation (for example, information about any spouse you have nominated as a potential recipient for benefits on your death), and your religious beliefs (for example, information about your ministry as a priest).

Such special categories of personal data will only be processed for the purposes of establishing eligibility for benefits, the calculation and payment of those benefits and demonstrating our past compliance with our duties.

How is your personal information collected?

We may collect personal data:

- directly from you through your participation in the Fund, when you correspond with us by phone, e-mail or otherwise or when you provide us with any additional information, for example, when you are appointed as a trustee, when we appoint you as a service provider;
- from third parties such as our service providers (for example, our Fund administration provider or Scheme Actuary), the employer (the General Synod of the Scottish Episcopal Church), any congregation or diocese to which you are or have been appointed, another pension Fund if you have transferred benefits, where a member includes your details in a beneficiary nominee form, a third party in relation to an event affecting you (for example, in the event of serious ill health), or from third party agencies or publicly accessible sources to try and find you when we have lost contact with you. We also work closely with third parties (including, for example, analytics providers).
- from regulatory authorities (such as The Pensions Regulator) or government departments (such as HMRC or the Department for Work and Pensions).

How we will use information about you

We use information held about you in order to administer the Fund. In particular, we will use personal data in order to:

- Issue communications and information (whether through us or through third parties);
- Respond to member and third party queries and disputes;
- Calculate and pay benefits (including pensions, lump sums and transfer values) from the Fund;
- Establish eligibility for benefits (including following divorce or death of a member, or in cases of ill health or early retirement);
- Calculate and perform a reconciliation of contributions;

- Pay tax charges and monitor whether allowances are exceeded and report to HMRC (including compliance with anti-money laundering duties, if applicable);
- Ensure compliance with contracting-out requirements;
- Prepare Fund accounts, audits and/or The Pensions Regulator scheme returns;
- Carry out actuarial valuations and calculations;
- Decide or advise upon the investment of Fund assets and to implement investment decisions;
- Obtain or prepare quotes for annuities or other insurance products;
- Purchase annuities or other insurance products;
- Demonstrate our past compliance with our duties;
- Establish your identity;
- Pay fees and expenses owed; and
- Carry out the general administration functions of the Fund (for example, to ensure documentation is properly executed and drafted, trustees are validly appointed, conflicts of interest are identified and managed and/or appropriate records are maintained).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or regulation

What is our legal basis for using your information?

We only process personal data where we have a lawful basis for doing so. The legal bases on which we use your information is as follows:

- To meet our legal obligation to provide benefits in line with the Fund's governing documents, and to meet other legal requirements when looking after the Fund (for example, as set out in pensions legislation). We will use your personal data to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal data with other people for this reason, such as courts and law-enforcement agencies.
- In our legitimate interests in properly looking after the Fund. This includes paying benefits as they fall due; buying insurance contracts; direct-debit instruction checks; communicating with you; and ensuring that correct levels of contributions are paid, that benefits are correctly calculated, and that the expected standards of Fund governance are met (including standards set out in Pensions Regulator guidance).
- We also have a legitimate interest to provide you with a high quality service including supporting your retirement journey and presenting your options at retirement.

If we need to use information about your health or sexual orientation (or other very personal and private information), we may ask your consent when we collect that information. However, sometimes there may be reasons of public interest or law that enable us to use this information without consent, for example, for the purposes of making a determination in connection with any benefits that may be payable under the Fund. If you have given us your consent, you can withdraw your consent at any time by using the details below in the 'Contact Us' section. This may affect what we can do for you, unless we have another lawful reason for using your information.

Sometimes your personal data may be used for statistical research but only in a form that no longer identifies you.

How long will we hold your information for?

We will hold your personal data for as long as is necessary to ensure we can satisfy our legal obligations regarding the Fund and pay any benefits due to you or dependants or concerning you.

We will retain your information for as long as is necessary to ensure that, if a query arises in the future about your benefits, whether from you or your beneficiaries or a third party, we have sufficient information to deal with that query. To meet this aim, most of the personal data that we hold will be kept for 6 years from the end of the Fund year in which the last payment from the Fund is made to you or in respect of you, or where a transfer of benefits out of the Fund has been made in respect of you, 6 years after the date of transfer.

However, some information may be kept for more or less time depending on how long we reasonably think we need it to deal with our legal obligations mentioned above, and any queries or complaints.

We review our retention periods for personal data on a regular basis.

Data sharing

In order to administer the Fund, we may from time-to-time share your personal data with various service providers, advisers and other entities, including:

- any new Fund trustees or employers;
- any Scheme Actuary appointed by us;
- any Fund administrator appointed by us (currently this role is carried out by Aptia);
- any Fund secretary appointed by us;
- our other professional advisers, including our auditors and legal advisers;
- our insurers;
- official bodies like HMRC, the Pensions Regulator and the Pensions Ombudsman
- any other service providers we use to support the Fund who provide services including information processing, managing and enhancing member data, providing member services, print and mailing services, investment management, cloud hosting and data analytics.

Our service providers may correspond with you directly in order to provide these services.

If your benefits are transferred to another pension scheme, we will also need to give the administrators of that pension scheme information about you.

We may also disclose your personal information to third parties to:

- Comply with any court order or other legal obligation or when data is requested by government or law enforcement authorities;
- Comply with our obligations in respect of any complaints raised under the Internal Dispute Resolution Procedure or any other complaints process;
- Protect the rights, property, or safety of us or others. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Data security

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. Details of these measures can be obtained on request. Our security measures are regularly reviewed.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

International transfers of personal data

From time to time, we may transfer your personal information outside of the UK to service providers, subcontractors and regulatory authorities for the purposes described in this Privacy Notice. If we do this, your personal information will continue to be subject to one or more appropriate safeguards set out in law, for example we may use model contracts in a form approved by regulators, or ensure that your personal data is protected through binding corporate rules.

Your rights

You have a number of rights under GDPR. These include:

- Right to access your personal information. This means you have the right to transparency over how we use your data and to make a subject access request;
- Right to request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- Right to request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
- Right to request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- Right to object to (i) processing based on our legitimate interests; and (ii) automated decision making and profiling; and
- Right to request the transfer of your personal information to another party.

If you would like to exercise any of these rights, please contact us using the details set out below in the 'Contact Us' section. If you exercise any of these rights we may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information. Where we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge except in exceptional circumstances.

If you would like to find out more about your rights, you can visit the Information Commissioner's Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>).

If you wish to raise a complaint in relation to our processing of your personal data, you can contact us at neilw@scotland.anglican.org or by writing to us at the Scottish Episcopal Church Pension Fund, 21 Grosvenor Crescent, Edinburgh, EH12 5EE and marking your query for the attention of the Pensions Officer.

If you are not satisfied with our response or believe that we are not processing your personal data in accordance with the law you have the right to lodge a complaint with the data protection regulator i.e. the Information Commissioner's Office. You can contact the Information Commissioner's Office at: <https://ico.org.uk/global/contact-us/>.

How you can access and update your information

We strive to maintain accurate, complete, and relevant personal information for the purposes identified in this privacy statement. If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it. It is important that the personal information we hold about you is accurate and current.

Contact Us

If you have any questions regarding this policy or about our privacy practices, wish to exercise any of your rights or which to make a complaint, please contact us at:

- Post: Scottish Episcopal Church Pension Fund, 21 Grosvenor Crescent, Edinburgh, EH12 5EE and marking your query for the attention of the Pensions Officer
- Telephone: 0131 243 1357
- E-mail: neilw@scotland.anglican.org