

Data Privacy

September 2021

Why we're telling you about data privacy

The Trustee (referred to as 'we' or 'us' in this notice) is responsible for running the scheme in line with the scheme rules and the law and for looking after members' and beneficiaries' interests (referred to as 'you' or 'your' in this notice).

We take your privacy very seriously. This privacy statement explains how we'll use the personal data we collect from you or that we receive from other sources, such as your employer.

We have measures and controls in place to help keep your personal data secure and to protect it from unlawful use, accidental loss, destruction or damage. This ensures that we comply with our obligations under data protection laws including the General Data Protection Regulation (the GDPR) from May 2018. For the purposes of these requirements, we are the data controller for the scheme.

We may change this privacy statement from time to time. If changes are made we'll take steps to let you know.

Why we need your personal data

As a data controller, we collect and process your personal data so that we can fulfill our legal duty to calculate and pay your benefits in line with the scheme rules and overriding legal obligations. For most of the personal data we hold, we do not need your explicit consent to do this.

We will only process certain types of sensitive personal data (also known as special categories of personal data) with your explicit consent. This will only apply in certain limited circumstances and we will ask you at the time to complete a consent form explaining why we need it.

The principles we'll follow

We are committed to respecting your privacy and to complying with data protection and privacy laws.

- We'll only collect and use your data where we have lawful grounds and legitimate reasons to do so
- We'll tell you how we'll collect and use your data.
- We won't ask for more data than we need
- We'll observe your rights under privacy and data protection laws and ensure that if you have a query about privacy issues, it is dealt with promptly and transparently
- We'll check that the organisations we share your personal data with, as data processors, are aware of their privacy obligations and have appropriate security measures in place to protect your data

Data we hold about you and how we use it

The personal data we hold about you may include:

- details that identify and locate you such as name, address and date of birth
- salary, contributions, service dates, retirement benefits and bank account details
- details of your other pension arrangements, tax residency status, PAYE coding and HMRC tax protection status

We may receive personal data about you from your employer. Such data may include any of the details above plus employment details.

We may also receive personal data from a number of other sources, including: our service providers, the sponsoring employer's payroll and HR providers, other schemes you have been a member of; data analytics companies (e.g. for member tracing, identity and existence checking); regulatory authorities or government departments.

We may use your personal data for any of the purposes below.

- To administer the scheme and establish if you qualify for benefits
- To exercise a discretion where benefits are paid at the discretion of the Trustee e.g. following your death
- To provide you with data that you request from us or which outlines your choices and options at a particular stage of membership
- To provide targeted communications relevant to your stage of membership and information about services which can be accessed by scheme members - which may be offered by other parties, e.g. retirement guidance and/or advice resources
- To monitor and improve our engagement with and support for members (including via surveys and research activities)
- To consider and respond to a concern or dispute you have raised through the scheme's internal disputes resolution procedure (IDRP)

How long we'll keep your personal data

Pension benefits are earned and paid over a long period. We will store and process your personal data for as long as necessary to comply with our legal obligations, pay benefits in line with the scheme rules and deal with queries about your benefits or those of your beneficiaries after your death. Our service providers and advisers will typically retain your personal data for a reasonable period after our agreement ends with them. This is to enable them to deal with queries into the future and protect themselves against legal claims.

Who we share your data with

To operate the scheme effectively, we need to share your data with third parties involved in running the scheme.

The third parties we may share your data with are:

- The sponsoring employer, and their professional advisers
- Third-party service providers who use your personal data to provide services to us, including the scheme administrator and retirement options guidance and advice services
- Professional advisers appointed to the scheme including the scheme actuary, auditor, legal advisers
- The Pensions Regulator (TPR) and/or other regulatory bodies, such as HM Revenue & Customs, where we are required by law to do this
- Insurance companies or other pension schemes with a view to securing benefits or transferring them out of the scheme
- Third parties to whom we may need to disclose personal data in order to comply with a statutory obligation (for example, in response to a Court Order or a law enforcement agency's request)
- Your dependants, beneficiaries and legal personal representatives after your death

Where we share your data, we are required to comply with data protection laws. We require third-party service providers who process your personal data in line with our instructions (as data processors) to comply with privacy principles as part of our contract with them. These service providers may, with our agreement, sub-contract certain processing activities, for example to external printing companies, data analytics providers or software providers. Before doing so, they must check that the sub-contracted service provider has adequate security measures in place.

The sponsoring employer, the scheme actuary, legal advisers and auditors appointed in relation to the scheme are data controllers in their own right (rather than data processors for us). As such, they have obligations to you directly to protect your data.

Details of the key third parties with whom your personal data may be shared are included in the Schedule at the end of this statement.

Keeping your personal data secure

Once we receive your data, we use appropriate procedures and security features to prevent unauthorised access. We require any third-party service provider who processes your personal data in line with our instructions (as data processors) to do so as well. If they process your personal data in other countries, including outside the European Economic Area, we require them to apply appropriate safeguards in compliance with data protection laws.

However, please be aware that providing data to us or our service providers via email or the internet is not completely secure and we cannot guarantee the security of data you send in this way. This is done at your own risk.

Your rights to access and correct the data we hold about you

Most of your personal data in relation to the scheme is held by the administrator. You can change, correct or complete the data we hold about you as follows:

You can update personal details by emailing the administrator whose contact details are shown below.

You may make a request, free of charge, for a copy of the personal data we hold for you (or that is held on our behalf). In some circumstances, you may request a copy of your personal data for the purpose of transmitting elsewhere.

You may also have the right to ask for the personal data we hold about you to be erased, to restrict the way we process it or object to its processing. These rights will not apply if the data is still needed to fulfill our legal duty to calculate and pay your benefits or we have a legal right to retain that data.

You may also withdraw your consent where we have asked you to give it explicitly in connection with certain types of sensitive personal data. However, exercising this right may limit our ability to administer your benefits.

To exercise these rights, you need to email your request to the administrator whose contact details are shown below.

Some final things to consider

Expression of wishes in the event of your death: You may also tell us who you would like the Trustee to consider when exercising discretion over payment of death benefits. We treat this information as confidential and will not disclose it whilst you are alive.

Third party websites: The scheme communications may, from time to time, contain links to third-party websites. These websites have their own privacy policies and we don't accept any responsibility or liability for their data privacy policies. You should check their policies before you submit any personal data to these websites.

Someone else acting for you: Where you have appointed someone to manage your pension on your behalf, we will assume, that you have provided full authority to that person to provide us with your personal data for us to use in accordance with this privacy policy. You are responsible for ensuring that the person has read and understands the terms of this privacy policy and agrees to its terms.

Contact details, questions and concerns

You can send any queries or comments about this privacy policy by email to the contact below. We encourage you to let us know if your personal data changes or if you think the data we hold on you is out of date.

If you have a concern about the way we handle your personal data, you should write to:

The Trustee of the Miller Retirement Benefits Scheme
c/o Barnett Waddingham LLP
2 London Wall Place
London EC2V 5AU
Email: Miller@barnett-waddingham.co.uk

Your query will be referred to the Trustee. If you are not satisfied with the response you receive, you can request details of the scheme's internal disputes resolution procedure (IDRP).

If you believe our handling of your personal data does not comply with data protection law, you can contact the Information Commissioner's Office (ICO) or raise a

complaint at www.ico.org.uk/concerns or call its helpline on **0303 123 1113**.
Alternatively, write to

The Information Commissioner's Office (ICO)
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

For Law Debenture Pension Trust Corporation p.l.c.
The Trustee of the Miller Retirement Benefits Scheme

SCHEDULE: Key third parties with whom your personal details may be shared

This schedule lists the key third parties with whom we may share your personal data.

Third Party	Function
Miller Insurance Services LLP	Sponsoring employer of the scheme
Steve Hitchiner FIA, Barnett Waddingham LLP	Scheme actuary
Barnett Waddingham LLP	Administrator
Hogan Lovells	Legal advisers
Crowe Clark Whitehill	Auditor
Phoenix Life	AVC provider

Where parties act as data controllers in their own right, this statement meets their duty to tell you how they collect and use your data.