

# Privacy Notice for the John Lewis Partnership Trust for Pensions

## Who we are

John Lewis Partnership Pensions Trust is the trustee (“the Trustee”) of the John Lewis Partnership Trust for Pensions (“the Scheme”).

As the Trustee of the Scheme, we hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be personal data.

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for, and the means by which, the personal data we hold is processed.

## What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your gender
- your marital status
- your address and other contact details
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits
- medical and other details about your health, if required

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

## How the information is used

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed to properly administer the Scheme and to calculate and pay your benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation.

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant’s benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the principal scheme member or through enquiries undertaken by us on a member’s death. The Trustee will not collect any personal data that is not needed.

Personal data relating to the Scheme is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

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As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “sensitive personal data”). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “sensitive personal data”. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

## What else we might do with personal data

From time to time parameters used in calculating benefits may be reviewed or updated. To ensure that any necessary changes do not have an adverse impact on benefit calculations, existing member data is used to test the changes. Before being passed to our system developers, unique identifiers are first removed so that data used in test cannot be linked to a specific individual.

## Who we share personal data with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

However, as the Trustee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current, past or future employer
- Trustee Services, the in-house team which supports the Trustee in discharging its obligations
- the Scheme’s professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee, namely the in-house Pension Office team and Legal & General, who administer the Defined Contribution section of the Scheme
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement
- insurance companies used to invest additional voluntary contributions
- insurance companies providing annuities for certain pensioners
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System in the UK and/or a payment via Citibank, when pensions are being paid overseas
- mortality tracing agency

## How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life.

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We review the personal data held in relation to the Scheme on a regular basis in accordance with our data retention schedule. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

## Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Trustee to restrict the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.
- **Withdrawing consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

## Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of this privacy notice
- make a complaint about how we have handled your personal data

please contact [pension.office@johnlewis.co.uk](mailto:pension.office@johnlewis.co.uk)

## Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

## Updates to this notice

This notice is the latest version as at 25 May 2018. This notice will be updated from time to time and you can see the current version at any time on the following external website address:

<http://www.johnlewispartnership.co.uk/resources/library/documents.html>