

General Privacy Notice

Countrywide Plc Pension Scheme

We, the Trustees of the Countrywide Plc Pension Scheme, gather, hold and use personal information (also known as personal data) relating to members and former members of the Pension Scheme, their family and dependants. We are committed to protecting, keeping secure and processing fairly and lawfully the personal information we gather, hold and use. This Privacy Notice explains how we do this.

About the Trustees

For the purposes of the data protection laws, we are a 'controller' of the personal information we gather, hold and use about you, your family and dependants as we decide the purposes for and how the personal information we gather and use 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, date of birth, gender and marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender and relationship to you)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits
- medical and other details about your health.

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

How we gather your personal information

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 other pension schemes where transfers into the Pension Scheme have been made, HM Revenue & Customs, the Pensions Ombudsman or persons acting on your behalf (such as an independent financial adviser).

If you are receiving a dependant's benefit from the Pension Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member, their personal representatives or through enquiries undertaken by us on a member's death.

We will not collect any personal data that we do not need.

How we use that information

We use personal information:

- to comply with our legal obligations under the documents governing the Pension Scheme and legislation governing the operation of pension schemes - namely to calculate and pay benefits due under the Pension Scheme;
- where we have a legitimate interest in holding and processing personal information about you as it is needed for us to properly administer the Pension Scheme and manage its liabilities. This might include internal statistical, financial modelling and reference purposes (e.g. when we assess how much money is needed to provide members' benefits and how that money should be invested).

Personal data relating to the Pension Scheme is held on paper and on computer systems. As the "data controller", the Trustees must process this information fairly and lawfully.

Sensitive data

As part of running the Pension Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special category" or "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, which we would seek at the time of obtaining such information.

Who we share data with

The Trustees need help from various advisers and other third parties to properly administer the Pension Scheme. We may share personal data with the following:

- Your current, past or future employer.
- Personnel within Countrywide who assist the Trustees with the administration of the Scheme and provide other support to the Trustees.
- Our scheme administrators (currently Capita), who are responsible for the day-to-day administration of the Pension Scheme, including processing contributions and paying benefits, and Capita's Financial Sanctions Screening partner, Lexis Nexis.

- Our Scheme actuary (currently Vijay Shah at Capita), who advises the Trustees on the Pension Scheme's funding levels. In order to do this, the actuary needs certain scheme membership information, and details about contributions and investments. The actuary may also calculate transfer payments, retirement benefits and other Pension Scheme benefits on our behalf.
- The Pension Scheme's other professional advisers, including auditors, medical advisers, investment advisers and lawyers.
- The advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement.
- Depending upon how Scheme pensions are paid, organisations to whom personal data is sent to effect pension or other benefit payments whether in the UK or overseas
- Providers of investments, insurers, reinsurers and other pension scheme operators where we make investments, or seek to provide benefits for members in other ways, such as using insurance or reinsurance.
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustees can be fined and subject to other action if it fails to provide certain information to these authorities.

Some of the organisations referred to above will simply process your personal data on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal data that we share with them. For example, the Scheme actuary is a joint controller with the Trustees when using personal information held in respect of you for the purposes of assessing, with the Trustees, certain specified financial matters affecting the Scheme. The current actuary to the Scheme is Vijay Shah of Capita Pension Solutions, whose address is 65 Gresham Street, London, EC2V 7NQ.

The above organisations may also include companies which are based outside the EEA. Where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure

How long we keep personal data for

We keep all personal data safe and secure and only hold it for as long as necessary. We will keep relevant personal information for as long as required to meet the purposes for which it was collected. In practice, this means for the life of the member, or the life of the last remaining beneficiary associated with the member, plus 10 years. However, there may be reasons why we need to keep data for longer such as for claims, data migration or archiving purposes.

We will review the personal information we hold in relation to the Scheme periodically. If the decision is taken that certain personal information is no longer needed, the personal information will generally be destroyed, erased or made inaccessible.

Your rights

You have the following legal rights in relation to the personal information we hold about you:

- *Access to your personal information* - you can request access to a copy of the personal information that we hold about you. Please make all requests in writing. You may be asked for evidence of your identity. Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances. Please note that we can in some circumstances refuse to act on requests.
- *Correction* - you can ask us to change or complete any inaccurate or incomplete personal information held about you.
- *Erasure* - you can ask us to delete your personal information where it is no longer necessary for us to use it or where we have no lawful basis for keeping it
- *Restriction* - you can ask us to restrict the personal information we use about you in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.

Please note that taking any of the above steps could impact on the payment of your benefits, your participation in the Pension Scheme, and/or our ability to answer questions relating to your benefits. Any request to restrict processing or to erase your data can also be overridden by the Trustees 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 the notice
- make a complaint about how we have handled your personal data

please contact:

The Countrywide Plc Pension Scheme
Capita
PO Box 555
Stead House
Darlington, DL1 9YT

Or phone 0345 602 5367

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. The details for the ICO's website can be found at: www.ico.org.uk