

# Full Privacy Notice

for the members and beneficiaries of Bedfordshire Pension Fund

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## Introduction

This privacy notice is for members and beneficiaries (referred to as “you”) of Bedfordshire Pension Fund (the “Fund”). It has been prepared by Bedford Borough Council (the “Administering Authority”, or “we”) in its capacity as the administering authority of the Fund. This privacy notice describes how we collect and use personal data in accordance with data protection legislation.

This privacy notice will also be made available on the [Fund’s website](#).

It is important that you read this privacy notice together with any other privacy notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice replaces any general privacy notice we may have previously issued and supplements any other notices and privacy policies we issue that are specific to particular data collection / processing activities.

## Why we are providing this notice to you

As the Administering Authority of the Fund, we hold certain information about you and from which you can be identified (“personal data”) which we use to administer the Fund and to pay benefits from it. In line with data protection legislation, we are required to give you information about the personal data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it. This notice is designed to give you that information.

## The technical bit

The Administering Authority holds personal data about you, in its capacity as data controller, for the proper handling of all matters relating to the Fund, including its administration and management. This includes the need to process your data to contact you; to calculate, secure and pay your benefits; for statistical and financial modelling and for reference purposes (for example, when we assess how much money is needed to provide members' and beneficiaries' benefits and how that money should be invested); and to manage liabilities and administer the Fund generally. Further information about how we use your personal data is provided below.

The lawful basis for our use of your personal data will usually be that we need to process your personal data to satisfy our legal obligations as the Administering Authority of the Fund, including, for example, our obligations under pension dashboard regulations. Where that lawful basis does not apply then the lawful basis for our use of your personal data will be one or more of the following:

- a) we need to process your personal data to carry out a task in the public interest or in the exercise of official authority in our capacity as a public body; and/or
- b) we need to process your personal data for the legitimate interests of administering and managing the Fund and liabilities under it; calculating, securing and paying benefits and performing our obligations and exercising any rights, duties and discretions the Administering Authority has in relation to the Fund; and/or
- c) because we need to process your personal data to meet our contractual obligations to you in relation to the Fund (for example, under an agreement

that you will pay additional voluntary contributions to the Fund), or to take steps, at your request, before entering into a contract.

Please note that where we indicate that our processing of your personal data is necessary for us to comply with a legal obligation, or for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it, and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract with you.

### What personal data we hold, and how we obtain it

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth, national insurance number, passport details, driving licence details, employee membership numbers and, if you have used a pensions dashboard to access information about your pension, a “pension identifier” (PEI) which is used to confirm a match and identify your specific benefits under the Fund of the purposes of displaying information via a dashboard.
- Information that is used to calculate and assess eligibility for benefits, for example, length of service or membership and salary information.
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax details.
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death.

- Information about your health, for example, to assess eligibility for benefits payable on ill health, or where your health is relevant to a claim for benefits following the death of a member of the Fund.
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Fund and the employer or the Fund may be reimbursed from your benefits.
- Information about any previous membership of other public service pension schemes and other LGPS administering authorities, including your date of leaving and whether the previous scheme/authority has assessed your eligibility for underpin protection (see “How we will use your information”, below).

We obtain some of this personal data directly from you. We may also obtain data (for example, salary information) from your current or past employer(s) or companies that succeeded them in business, from a member of the Fund (where you are or could be a beneficiary of the Fund as a consequence of that person’s membership of the Fund) and from a variety of other sources including public databases (such as the Register of Births, Deaths and Marriages), a pensions dashboard (when you use it to access your pensions information), data tracing agencies, our advisers, additional voluntary contribution (AVC) arrangement providers and government or regulatory bodies, including those in the list of organisations that we may share your personal data with as set out below.

Where we obtain information concerning certain “special categories” of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You

have the right to withdraw your consent to the processing at any time by notifying the Administering Authority in writing. However, if you do not give consent, or subsequently withdraw it, the Administering Authority may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Fund, please ensure that those individuals are aware of the information contained within this notice.

### How we will use your personal data

We will use this data to deal with all matters relating to the Fund, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- To contact you.
- To assess eligibility for, calculate and provide you (and, if you are a member of the Fund, your beneficiaries upon your death) with benefits.
- To identify your potential or actual benefit options and, where relevant, implement those options.
- To allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements.
- To facilitate your access to your pensions information via a pensions dashboard.

- To facilitate your access to pensions information through Bedfordshire Pension Fund's member self-service portal, My Pension Online.
- For statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members' and beneficiaries' benefits and how that money should be invested).
- To assess and, if appropriate, action a request you make to transfer your benefits out of the Fund.
- To comply with our legal and regulatory obligations as the administering authority of the Fund.
- To address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Fund.
- The management of the Fund's liabilities, including the entering into of insurance arrangements and selection of Fund investments.
- In connection with the sale, merger or corporate reorganisation of or transfer of a business by the employers that participate in the Fund and their group companies.
- To identify whether you qualify for underpin protection. For more information, please see <https://www.lgpsmember.org/mcccloud-remedy/>

### Your data and My Pension Online

We use your data to provide you with information about your pension benefits through our online member portal, My Pension Online.

When registering for My Pension Online, you may be asked to provide an image from an identity document (e.g. driver's licence or passport) and a current facial



image, to verify your identity. As part of this process, we collect the passport number and driver's licence number.

The current facial image is collected by the company that provides the identity verification service, GB Group. The image is not used for any purposes other than to verify your identity to allow you access to the portal and is only held by the company for a short period of time. You can read GB group's privacy policy on the [GB Group website](#).

### Organisations that we may share your personal data with

From time to time, we will share your personal data with advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Fund. Some of those organisations will simply process your personal data on our behalf and in accordance with our instructions; they are referred to as processors. Other organisations will be responsible to you directly for their use of personal data that we share with them; they are referred to as controllers. The controllers may be obliged under the data protection legislation to provide you with additional information regarding the personal data they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example via their websites.

Whenever one of our advisers or service providers acts as a joint controller with us in respect of your personal data, because we jointly determine the purposes and means of processing it, we will agree with them how we are each going to meet our respective and collective obligations under the data protection legislation. If you would like more information about how such an arrangement works, please contact us using the contact details below.

The organisations that we may share your personal data with may include the advisors and service providers shown below.

## **Processors**

- Pensions software and member self-service website provider (currently Heywood Pension Technologies)
- Accountants & creditors (currently Bedford Borough Council)
- Tracing bureaus for mortality screening (currently Heywood Pension Technologies)
- Tracing bureaus for locating members and beneficiaries (one-off contracts)
- Overseas payments provider to transmit payments to Fund members and beneficiaries with non-UK accounts (currently Equiniti and Citibank)
- Integrated service provider(s) facilitating connections to a pensions dashboard (currently Heywood Pension Technologies).
- Printing companies (currently Adare SEC and CFH)
- Suppliers of IT, document production and distribution services (currently Bedford Borough Council)

## **Controllers**

- Scheme benefit consultant (currently Barnett Waddingham)
- Investment adviser (currently Hymans Robertson)
- Additional Voluntary Contribution providers (currently Prudential and Standard Life)
- Legal adviser (currently Eversheds Sutherland LLP)

- Fund Actuary (currently Barnett Waddingham)
- External auditor (currently KPMG)
- Internal auditor (currently Bedford Borough Council)
- LGPS National Insurance database (South Yorkshire Pensions Authority)
- Administering authorities of other LGPS funds (or their agents, such as third-party administrators) where you have been a member of another LGPS fund, and the information is needed to determine the benefits to which you or your dependants are entitled
- Administrators of other public service pension schemes where you have been a member of another public service pension scheme, and the information is needed to determine if you qualify for underpin protection
- The Department for Work and Pensions
- The Government Actuary's Department
- The Cabinet Office – for the purposes of the National Fraud Initiative
- HM Revenue and Customs
- The Courts of England and Wales – for the purpose of processing pension sharing orders on divorce
- The Money and Pensions Service (MaPS)

Where we make Fund investments or seek to provide benefits for members and beneficiaries in other ways, such as through the use of insurance, then we may also need to share personal data with providers of investments, insurers and other pension scheme operators.

From time to time we may provide some of your data to your employer and their relevant subsidiaries (and potential purchasers of their businesses) and advisers

for the purposes of enabling those entities to understand the liabilities and obligations of the employer regarding the Fund. Your employer would generally be a controller of the personal data shared with it in those circumstances. For example, where your employment is engaged in providing services subject to an outsourcing arrangement, the Administering Authority may provide information about your pension benefits to your employer and to potential bidders for that contract when it ends or is renewed.

The pensions dashboard framework requires us to share personal data with the dashboards ecosystem. When a member searches for information about their pension online via a pensions dashboard, we receive certain personal data for the purposes of identifying a match with the member's pension in the fund. We then need to provide certain pensions information to the dashboards ecosystem, so that it can be displayed via the relevant dashboard.

Where requested or if we consider that it is reasonably required, we may also provide your data to government bodies and dispute resolution and law enforcement organisations, including those listed above, the Pensions Regulator and the Pensions Ombudsman. They may then use the data to carry out their functions.

The organisations referred to in the paragraphs above may use the personal data to perform their functions in relation to the Fund as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

We do not use your personal data for marketing purposes and will not share this data with anyone for the purpose of marketing to you or any beneficiary.

### Transferring information outside the UK

In some cases, recipients of your personal data may be outside the UK. As such, your personal data may be transferred outside the UK to a jurisdiction that may not offer an adequate level of protection as is required by the UK government.

If this occurs, additional safeguards must be implemented with a view to protecting your personal data in accordance with applicable laws. Please use the contact details below if you want more information about the safeguards that are currently in place.

### How long we keep your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Fund, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations. In practice, this means that your personal data will be retained for the greater of:

- such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Fund and for a period of 15 years after those benefits stop being paid. For the same reason, your personal data may also need to be retained where you have received a transfer, or refund, from the Fund in respect of your benefit entitlement
- 100 years from a member's date of birth; or

- 100 years from the date of birth of any beneficiary who received benefits from the Fund after the member's death.

Where you seek to access your pensions information via a pensions dashboard, the pensions dashboard regulations require us to retain different types of information (some of which includes personal data) for specific periods, as described in more detail here:

<https://www.pensionsdashboardsprogramme.org.uk/standards/data-retention-schedule>.

## Your rights

You have a right to access and obtain a copy of the personal data that the Administering Authority holds about you and to ask the Administering Authority to correct or complete your personal data if there are any errors or it is out of date or incomplete. In very limited circumstances, you may also have a right to ask the Administering Authority to restrict the processing of your personal data, or to transfer or (in extremely limited circumstances, such as where your personal data is no longer needed for the purpose for which it is being processed) erase your personal data. You should note that we are not obliged to erase your personal data if we need to process it for the purposes of administering the Fund.

In certain circumstances you have the right to object to the processing of your personal data; for example, you have the right to object to processing of your personal data which is based on the public interest or legitimate interests identified in the section above headed "*The technical bit*", or where processing is for direct marketing purposes.

You can obtain further information about your rights from the Information Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or if you have any queries, complaints or concerns regarding the processing of your personal data, please contact the Fund Administrator or our Data Protection Officer as indicated below. You also have the right to lodge a complaint in relation to this privacy notice or the Administering Authority's processing activities with the Information Commissioner's Office which you can do through the website above or their telephone helpline.

As explained in the section above headed "How we will use your personal data", one of the reasons we collect and hold your personal data is to administer your Fund benefits. If you do not provide the information we request, or ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits, including the payment of benefits from the Fund. In some cases, it could mean the Administering Authority is unable to put your pension into payment or has to stop your pension (if already in payment).

## Updates

We may update this notice periodically. Where we do this, we will inform members and beneficiaries of the changes and the date on which the changes take effect.

## Contacting us

Please contact Bedfordshire Pension Fund for further information:

[pensions@bedford.gov.uk](mailto:pensions@bedford.gov.uk)

## Data Protection Officer

You may also contact our data protection officer for further information or if you have a complaint about how we have handled your personal data:

[dpo@bedford.gov.uk](mailto:dpo@bedford.gov.uk)