

## **Privacy Notice (summary)**

for the members and beneficiaries of Bedfordshire Pension Fund

This privacy notice explains how and for what purposes Bedford Borough Council (the “Administering Authority” or “we”) uses the personal data of members and beneficiaries (referred to as “you”) of Bedfordshire Pension Fund (the “Fund”). As the Administering Authority for Bedfordshire Pension Fund, we hold certain information about you and from which you can be identified (“personal data”) which is needed to administer the Fund.

In this privacy notice, we have summarised some of the key ways in which we collect and use personal data in accordance with our requirements under data protection legislation. Further information can be found in the [Full Privacy Notice](#).

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.

### **What personal data do we hold?**

The types of 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 for the purposes of displaying information via a dashboard.
- Information relating to your benefits in the Fund, including length of service or membership and salary.
- Other information in relation to your membership of the Fund or to enable the calculation or payment of benefits, for example bank account 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 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 assessed your eligibility for underpin protection.

We obtain some of this personal data directly from you. We may also obtain data from your employer (for example, salary information) and from other sources including public databases and the advisers and service providers that we may share your personal data with, which are listed in the Full Privacy Notice.

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.

### What will we do with your personal data?

We will use this personal data to administer the Fund and to calculate and provide you (and, if you are a member of the Fund, your beneficiaries if you die) with benefits. We will also use this personal data for statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members’ benefits and how that money should be invested), and to comply with our legal obligations. We will also use your personal data to facilitate your access to your pensions information via a pensions dashboard and via the pension fund’s member self-service portal, My Pension Online. For more details about the purposes for which we process your personal data, please see the [Full Privacy Notice](#) on our website.

From time to time, we will share your personal data with third parties, including our contractors, advisors, government bodies and dispute resolution and law enforcement agencies and insurers in order to comply with our obligations under data protection legislation, and in connection with the provision of services that help us carry out our duties, rights and discretions in relation to the Fund. These organisations are listed in the Full Privacy Notice.

We may also process your personal data to assess and, if appropriate, action a request you make to transfer your benefits out of the Fund.

In some cases these recipients may be outside the UK. If this occurs, we will make sure that additional safeguards are in place to protect your data in accordance with applicable data protection laws. Please use the contact details below if you want more information in connection with this.

### What is the lawful basis for our use of your personal data?

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 our obligations under the Pensions Dashboard Regulations 2022. However, 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 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.

### How long will we hold your data?

We will only keep your personal data for as long as we need it to administer the Fund and to deal with any questions or complaints that we may receive about this, unless the law requires us to keep it for a longer period. In practice, this means that your personal data may 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 we hold about you and to ask us 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 us 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 "What is the legal basis for our use of your personal data?", or where the 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, 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 summary notice, the Full Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the benefits payable to you under the Fund. In some cases it could mean that we are unable to put your pension into payment or have to stop your pension (if already in payment).

## 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)