

Comshare Retirement and Death Benefits Plan Privacy Notice

Purpose Of This Notice

This Privacy Notice explains how we use and protect your personal information as a member of the Comshare Retirement and Death Benefits Plan (the "Plan"). We may provide additional notices when we collect specific types of information, which will supplement this notice.

We will notify you of any substantial changes to how we use your information and provide you with an updated notice when necessary.

Who Is Responsible For Your Information?

The Trustee of the Comshare Retirement and Death Benefits Plan, is the "data controller" of your personal information and is responsible for your personal information and deciding how it is used to administer the Plan.

Contact Details:

Scheme Administrator

First Actuarial
Network House
Basing View
Basingstoke
Hampshire
RG21 4HG

Email: basinstoke.admin@firstactuarial.co.uk

Telephone: 01256 297 700

Data Protection Officer (if appointed): We have not appointed a Data Protection Officer.

Who we work with: We work closely with the Scheme Administrator (First Actuarial), our Scheme Actuary (Scott Harrison), and our advisers. In providing services to the Plan, the Scheme Actuary (Scott Harrison) acts as a joint data controller with us and is therefore covered by this Privacy Notice. The Scheme Administrator (First Actuarial) and our advisers process personal data on our behalf and act as data processors.

What Personal Information Do We Hold?

We hold personal data about you to enable us to administer your membership, calculate your benefits, and pay benefits to you or your dependants. The information is also used for the financial management and governance of the Plan.

The personal data we hold includes:

- Employment history: details of your employment, including dates of service and salary information
- Personal details: name, previous names (including maiden names), date of birth, National Insurance number, postal address, email address and telephone number
- Benefits information: records of benefits transferred into the Plan from other pension arrangements, additional voluntary contributions, and details of benefits payable from the Plan

- Family information: details of your spouse, civil partner, or other dependants who may be entitled to benefits
- Banking details: bank account information (when we need to start paying benefits to you).

Special Category Personal Data

In certain circumstances, we may need to process more sensitive “special category” personal data, such as:

- Health information: when assessing eligibility for ill-health benefits or considering applications for early retirement on medical grounds
- Information about family members: when paying dependant’s benefits following your death

We process this information where it is necessary for the purposes of carrying out our obligations and exercising specific rights in connection with employment, social security and social protection law (Article 9(2)(b) UK GDPR).

In some cases, particularly where we obtain medical evidence, we may also seek your explicit consent to access and use your health information.

We will always explain why we need special category data and how we will use it. You have a right to object to this processing, though this may affect our ability to pay certain benefits.

Legal Basis For Processing Your Data

We process your personal data under the following legal bases as set out in the UK General Data Protection Regulation (UK GDPR):

We process your data to comply with our legal obligations, including:

- Providing information to HM Revenue & Customs (HMRC) for tax purposes
- Reporting to The Pensions Regulator as required by pensions legislation
- Meeting requirements under the Pension Schemes Act 2021 and regulations relating to pensions dashboards
- Complying with other statutory obligations relating to pension scheme administration

We have legitimate interest in:

- Ensuring you and your dependants receive the correct benefits
- Administering the Plan efficiently and effectively
- Ensuring the Plan is properly funded and has sufficient assets to pay out benefits
- Maintaining accurate records of membership and benefits
- Preventing and detecting pension fraud

Where Did We Get Your Information?

We obtained your personal information from:

- **Your employer:** who provided us with data such as your salary information, part-time working patterns, and notification of changes to your employment
- **You directly:** through application forms, benefit option forms, expression of wish forms, correspondence, and notifications to your personal circumstances
- **HM Revenue & Customs:** tax codes and any information about guaranteed minimum pension entitlements
- **Tracing agencies:** where it was necessary to use an agency to contact you

- **Medical professionals:** with your consent, when assessing ill-health benefit applications

Who Do We Share Your Information With?

To run the Plan effectively, we share your personal information with:

Scheme Administrators and Advisers

- Scheme Administrator: First Actuarial
- Auditors, legal advisers, and other professional advisers

Regulatory and Government Bodies (where required by law)

- HM Revenue & Customs (HMRC)
- The Pensions Regulator
- The Pensions Ombudsman
- Department for Work and Pensions

Other Organisations (when necessary for Plan administration)

- **Insurance companies:** if we purchase annuities or insurance on your behalf
- **Other pension schemes:** if you transfer your benefits to another scheme
- **The sponsoring employer:** to enable them to manage their financial obligations to the Plan and answer your benefit questions
- **Tracing agencies:** if we need to locate you

We only share your information where necessary for the proper administration of the Plan. We do not sell or share your information for marketing purposes.

Where we share information with administrators and advisers, we remain in control of your data and ensure appropriate data protection agreements are in place.

International Transfers

We won't transfer your personal data outside the United Kingdom unless in the following circumstances:

- You are an overseas member
- You transfer benefits to a Qualifying Recognised Overseas Pension Scheme (QROPS)"

Where we transfer data internationally, we ensure appropriate safeguards are in place, such as:

- Standard contractual clauses approved for use in the UK
- International Data Transfer Agreements
- Your explicit consent (for transfers you have requested)

If you would like more information about international transfers, please contact us using the details at the end of this notice.

How Long Do We Keep Your Data?

We retain your personal data for as long as necessary to fulfil our obligations to you and your potential beneficiaries, and to comply with legal and regulatory requirements.

In practice, we retain your data as follows:

- Active members: throughout your membership
- Deferred members: until benefits commence or are transferred
- Pensioner members: as long as we are paying you a pension
- Dependants: personal data is retained until we pay them a benefit or their information is updated by you
- After benefits cease (or you transfer out): we will retain your personal data for the lifetime of the Plan, to address potential claims and meet regulatory requirements

Our Scheme Actuary and actuarial advisers retain copies of data for up to seven years after they cease to act for the Plan.

If we change administrators or advisers, your data will be transferred securely to new providers, and previous providers will retain your personal data for up to 2 years to assist us with any handover.

Automated Decision-Making

We do not use automated decision-making (decisions made solely by computers without human involvement) to make decisions about your pension benefits.

Your Rights Under UK GDPR

Under the UK GDPR, you have the rights to:

Access Your Information

You can request a copy of the personal information we hold about you at any time. This is called a Subject Access Request. We will respond within one month.

Correct Inaccurate Information

If we hold incorrect information about you, you can ask us to correct it. Please contact us as soon as possible if any of your details change.

Request Deletion

In some circumstances, you can ask us to delete your information. However, we may need to retain it to meet legal and regulatory requirements for pension schemes.

Restrict How We Use Your Information

You can ask us to restrict how we use your data in certain circumstances, such as while we investigate a complaint about data accuracy.

Object to Processing

You can object to how we use your information. However, we may not be able to stop processing your data if it is necessary to:

- Administer the Plan and pay your benefits
- Comply with legal obligations
- Meet regulatory requirements

In these cases, we will explain why we need to continue processing your data.

Data Portability

You have a limited right to receive your data in a structured, commonly used format.

Right to Complain

You have the right to contact us or our data protection officer (if appointed) if you have any concerns with how we use your personal data. We will acknowledge your complaint within 30 working days and will do our best to resolve your concerns. You do not have to make your complaint in a specific way but, for quicker resolution, we encourage you to send in your complaints to basinstoke.admin@firstactuarial.co.uk.

You also have a right to complain to the Information Commissioner's Office (ICO) if you believe that our use of your personal data is in breach of data protection laws and/or regulations. More information can be found on the ICO's website <https://ico.org.uk/>. Exercising this right will not affect any other legal rights or remedies you have.

Pensions Dashboard Programme

As required by law, we share certain information about your pension with the Pensions Dashboard Programme. This allows you to view your pension information online, securely and in one place, alongside pensions you hold with other providers.

What information do we share?

We share the following information with the dashboard ecosystem:

- Your name and contact details
- Your National Insurance number or other identifying information
- Details of your pension scheme(s) with us
- The value of your pension benefits
- Your estimated retirement date and projected pension income

Why we share this information and our lawful basis

We are legally required to connect your pension data to the Pensions Dashboard Programme under (the Pensions Dashboards Regulations 2022).

Under the UK GDPR, we process your personal information on the following lawful basis:

- **Legal obligation** (Article 6(1)(c) UK GDPR): We must comply with pensions dashboard regulations that require us to make your pension information available through the dashboard ecosystem.

This legal requirement helps you access and manage your pension information more easily.

Who we share it with

To fulfil this legal obligation, our administrator 'First Actuarial' will share your data with Origo, an authorised Integrated Service Provider, who processes this information on our behalf and transmits it securely to the Pensions Dashboard Programme ecosystem. From there, when you request to view your pensions through a qualifying dashboard service, your information will be displayed to you.

Your rights

You have the right to access, correct, or request information about the processing of your personal data. However, because we are legally required to provide your pension information with the Pensions Dashboards Program, we cannot stop sharing this data while you remain a member of the Plan and the legal obligation applies. If you have concerns about how your data is used, please contact us at basingstoke.admin@firstactuarial.co.uk.

Data security

Your pension information is transmitted and stored securely using encryption and other appropriate technical measures. Origo and the Pensions Dashboards service provider must meet strict security standards set by the Pensions Regulator and the Financial Conduct Authority.

For more information about the Pensions Dashboard Programme, visit Pensions Dashboards Programme

<https://www.pensionsdashboardsprogramme.org.uk/publications/news/government-reaffirms-commitment-to-pensions-dashboards>

Keep Us Informed

It is important that we hold accurate and up-to-date information about you. Please notify us promptly of any changes to your:

- Address
- Marital or civil partnership status
- Banking details
- Dependants

Keeping your details current ensures we can contact you about your benefits and pay you correctly when benefits become due.

Contacting Us

If you have any questions about this privacy notice or how we use your personal information, please contact:

Scheme Administrator

First Actuarial
Network House
Basing View
Basingstoke
Hampshire
RG21 4HG

Email: basingstoke.admin@firstactuarial.co.uk

Telephone: 01256 297 700

On behalf of the Trustee of the Comshare Retirement and Death Benefit Plan

BESTrustees Limited
1 Cornhill
London
EC3V 3ND

This privacy notice was last updated on: 19 June 2026