

Redrow Staff Pension Scheme (“the Scheme”) – General Data Protection Regulations

Data protection is extremely important to ensure that personal information is kept securely and used only for the right purposes.

Since 25 May 2018 the General Data Protection Regulations (as incorporated into UK data protection legislation) have applied to the protection of personal information. Under these regulations one of the things we must do is to write formally to all the members of the Scheme to explain how your personal information will be used, who will have access to it and what rights you have.

The personal information that our advisers hold on our behalf is never sold on to other organisations and is never used so that other organisations can sell you their products or services.

Why are the Trustees writing to me?

Under the regulations the Trustees are “Data Controllers”. This means that we decide how and why your personal information is used and we take ultimate responsibility for compliance with data protection laws. As Data Controllers, the Trustees collect and process your personal information for the purposes of complying with our legal duties to administer the Scheme, and for other legitimate purposes relating to the operation of the Scheme.

What is personal information?

This is information that could be used to identify you as an individual and includes your name, address, salary and service history, date of birth, gender, National Insurance number and contact details, as well as, in the case of members receiving a pension, bank and tax code details.

For what purpose do we use your personal information and who has access to it?

The Scheme’s administrator, Mercer Limited, (“Mercer”) is the organisation that holds complete records of all the members of the Scheme. Mercer looks after your membership record and calculates and arranges payment of your benefits.

The Scheme’s actuarial advisers, XPS Pensions (“XPS”), and the Scheme Actuary need access to some personal information in order to assess how well funded the Scheme is and in order to assist in calculating benefits in some cases. The Scheme Actuary is also a Data Controller and details of how the Scheme Actuary processes your personal information is included at the end of this notice. The legal adviser to the Trustees, DLA Piper UK LLP (“DLA”) is also a Data Controller and details of how DLA processes your personal information is also included at the end of this notice.

In January 2023 the Trustees invested the bulk of the Scheme’s assets in a bulk annuity policy with Phoenix Life Limited (trading as Standard Life). This investment required the Trustees to share certain information about all members and their dependants with Phoenix Life Limited in order to purchase the policy. Further details about how Phoenix Life Limited and their reinsurer Canada Life Reinsurance will hold and maintain your data can be found at:

<https://www.phoenixlife.co.uk/legal-and-policies/privacy-notice>

<http://www.canadalifere.com/data-privacy-notice.html>

From time to time, other organisations may also need access to your personal information. For example the Scheme’s auditor will have access to a limited amount of personal information in order to ensure that the Scheme’s finances are in order and the correct benefits are being paid out. The Scheme’s legal adviser may need to be consulted on individual cases. If you are a pensioner Mercer also has to provide information to HMRC so that they know what tax has been deducted from your pension.

Redrow Plc and Redrow Homes Limited will hold your personal information to comply with their legal obligations as the sponsoring employers of the Scheme. These organisations also have a legitimate interest in the Scheme being run in a cost effective way and may have an interest in certain options available to members. Redrow Homes Limited also operates our pensioner payroll and so holds personal information about you in order to undertake this role.

All of the organisations that need access to your personal information will have to comply with the new regulation. The Trustees and our advisers will work with all third parties to ensure that they have policies and procedures in place to keep your personal information secure.

We also receive information from members about their proposed beneficiaries, who would be eligible to receive benefits on the member's death. This information comprises the beneficiaries name, address and relationship with the member. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them.

What will you do with my personal information and how long will you keep it?

The reason we and our advisers hold personal information is for the calculation and administration of the benefits under the Scheme, as well as for the general management and funding of the Scheme and ensuring compliance with legal and regulatory duties.

We will need to hold personal information for as long as you are a member of the Scheme, as long as your beneficiaries continue to receive benefits from the Scheme and such length of time thereafter as is necessary for us to comply with our duties to administer the Scheme. In practical terms, there are often occasions when a review of historical member information is necessary. One of the most recent examples of this is HMRC's decision to cease the practice of contracting out of the State Pension. In this case the Scheme administrators are looking back at records held up to 40 years ago to make sure that every member's National Insurance contribution record is correct and is in line with what HMRC hold.

Your personal information may also be transferred outside the European Economic Area ("EEA"). We will ensure the recipients of your personal information are subject to the same data protection and privacy duties as if they were in the EEA. If you wish to obtain information about these safeguards you should contact the Trustees through their administrators, Mercer at the address set out below.

What rights do I have?

Under certain circumstances, by law you have the right to:

- access the personal information we hold about you;
- ask us to correct the personal information we hold about you (such as a change of address or your contact details);
- ask us to transmit your personal information to another Data Controller (such as a new employer);
- ask us to discontinue or restrict the processing of your personal information; or
- ask us to delete or remove your personal information from our records.

In the latter two cases we may not be able to discontinue or restrict the processing of your personal information or delete your personal information if to do so would mean we could no longer administer your benefits in the Scheme. Further, not all of these rights are absolute rights and they may be subject to exceptions. To request to exercise these rights, please contact Mercer at the address below.

For pension schemes there are legal and valid reasons why your personal information is kept and used for all of the purposes associated with managing a pension scheme.

If we do not hold all the information we need to administer your benefits, we may not be able to pay out the benefits you are entitled to, and for this reason your right to request that your personal information is deleted will not apply to most of the information we hold about you. We will inform you in writing if there is a reason we cannot delete your personal information.

If you are asked to provide consent (to agree that another organisation can have access to your personal information or for us to use especially sensitive information such as health records) then you have the right to withdraw that consent at any time. This will not affect the lawful basis on which your personal information was held prior to your consent being withdrawn.

If you are unhappy with the way your personal information has been used you can complain to the Information Commissioner's Office (ICO). Their address is shown below:

Information Commissioner's Office
Wycliffe House

Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)
Website: <https://ico.org.uk/concerns>

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Do I need to pay a fee to access my information?

You will not have to pay a fee to access your personal information (or to exercise any of the other rights), except in exceptional circumstances which we will inform you about in advance.

Your duty to inform us of changes

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You should contact the Trustees by writing to the Scheme administrator using the details below:

Post: Mercer Limited
Post Handling Centre B
Redrow Staff Pension Scheme
St James' Tower
7 Charlotte Street
Manchester, M1 4DZ

Email: redrowpensions@mercer.com

Phone: 0800 458 6077

Other events

In future, when there are significant changes to the Scheme or projects that require us to use your personal information we will explain in more detail why it is being used and whether you need to consent to that particular use of your data.

Your benefits are not affected and you do not need to take any action as a result of receiving this letter. However, if you have any questions the Trustees can be contacted by writing to the Scheme administrator using the contact detail in the section above.

SCHEDULE OF OTHER DATA CONTROLLERS

How XPS uses your personal information

The current XPS Scheme Actuary (Michael Tudor FIA) and XPS Pensions Group, when providing defined benefits actuarial consulting services, are also Data Controllers. The Trustees will share your personal information with XPS in order for them to provide these services.

The XPS Privacy Information is available at <https://www.xpsgroup.com/privacy-policy/>

The pertinent Notice is labelled “*Combined Scheme Actuary and actuarial consulting services to pension schemes*”.

XPS may make changes from time to time so you should check the latest version of this Privacy Information occasionally.

XPS takes your privacy very seriously and they ask that you read their Privacy Information carefully as it contains important information on:

- The personal information the Trustees share with XPS in relation to the services provided;
- What XPS does with your information;
- Who XPS may share your information with; and
- What rights you have regarding XPS's holding of your information.

The Scheme Actuary may change. If you wish to know who the current Scheme Actuary is, please refer to the most recent Scheme accounts, or contact the Trustees.

How DLA Piper UK LLP (the Trustees' legal adviser) uses your personal information

DLA Piper UK LLP is also a Data Controller with the Trustees and the Scheme Actuary. The Trustees may share your information with DLA Piper UK LLP in order for them to provide legal advice to us about the Scheme. The DLA Piper UK LLP privacy notice can be viewed at the address below. Please note it may be amended from time to time.

DLA Piper UK LLP's Privacy Information is available at: <https://www.dlapiper.com/en/uk/privacy-policy/>.

How Phoenix Life Limited (trading as Standard Life) uses your personal information

Phoenix Life Limited and their reinsurer Canada Life Reinsurance are also a Data Controllers. The Trustees will share your information with Phoenix Life Limited in order for them to pay the required money to the Scheme to pay benefits as required under the bulk annuity contract. The Phoenix Life Limited privacy notice is available at <https://www.phoenixlife.co.uk/legal-and-policies/privacy-notice> and the Canada Life Reinsurance privacy notice is available at <http://www.canadalifere.com/data-privacy-notice.html> .