

**NAAFI PENSION FUND (THE "FUND")**

**PRIVACY NOTICE – PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR SURVIVORS**

As Trustee of the Fund we need to collect and use personal information about our members and their survivors. This privacy notice sets out how we collect, use and protect your personal information and your rights in relation to your information. It is issued in accordance with data protection law.

Some of the Trustee's advisers, including the Fund's Actuary at Lane Clark & Peacock, are also classified as Data Controllers in respect of Fund data when providing scheme actuarial services, so Sections 2 and 3 apply equally to them as data controllers.

LCP's Third Party Privacy Notice is available online at <https://www.lcp.com/en/third-party-privacy-notice>.

The Fund's pensions administrators, Trafalgar House, are designated as data processors, as they process data on behalf of the Trustee. As data processor, Trafalgar House are accountable to the Trustee and are bound to comply with the principles of the data protection regulations. The contact details for Trafalgar House are set out at the foot of this privacy notice.

The terms of the Trustee's agreement with the advisers confirm their responsibilities in relation to information sharing and data security. Personal information is information or a combination of pieces of information that could reasonably allow you to be identified. The Trustee may also share your information with the Navy, Army and Air Force Institutes and their professional advisers in connection with its responsibilities towards the Fund.

**1. PERSONAL INFORMATION WE USE**

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Fund's employer and information we get from other sources, including public databases.

**1.1 What Information may we collect directly from you?**

The categories of personal information that we collect directly from you include:

- (a) personal details (for example, your name, date of birth);
- (b) your bank details and national insurance number;
- (c) your contact details (for example, your address, phone number and email address); and
- (d) details about who you would like us to consider paying benefits to if you die.

## 1.2 **What information may we collect from other sources?**

These are examples of categories of information we may collect from other sources.

- (a) personal details (for example your name, date of birth);
- (b) your contact details (for example your address, phone number and email address);
- (c) information necessary to calculate and pay your contributions or benefits (for example your employment history and salary); and
- (d) information from HMRC (for example your tax code)

## 1.3 **How will we use your personal information?**

The ways we use your information include:

- (a) identifying you and your survivors and making sure your details are up to date;
- (b) communicating with you;
- (c) calculating and paying your benefits; and
- (d) making decisions – such as whether to agree to early retirement or how to distribute benefits after your death.

## 1.4 **What is the legal basis for processing your personal information?**

We must have a legal reason to use your personal information. The legal reasons are:

- (a) to fulfill our legal obligations, such as giving you specified information about your benefits as required by pension legislation;
- (b) to meet our legitimate interests to administer the Fund efficiently and to pay benefits to you and your survivors in accordance with the Fund rules; and
- (c) because we need to use the information to fulfill our obligations (for example, to pay ill health pensions or benefits after your death) and our use of the information is authorised by law.

In a few cases, especially where you have given us information about your health, we may ask for your consent to process your data. Where this applies, you may take back your consent at any time by contacting us using the contact details below. This will be explained in more detail in any forms where we request this information.

## **2. INFORMATION SHARING**

We may share personal information with:

- (a) the Fund's administrators and our advisers (such as the Fund Actuary and our legal advisers) to facilitate the administration of the Fund and your benefits;
- (b) His Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund; and
- (c) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes.

We may also provide some of your personal information to The Navy, Army and Air Force Institutes to help it to make decisions relevant to its role as sponsoring employer. We will only do so to the extent we consider necessary for a legitimate purpose (such as making the appropriate pensions disclosure in annual accounts).

## **3. SECURITY AND STORAGE**

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

We will keep your personal information for as long as we have a relationship with you or your survivors and, in addition, we will keep your personal information after our relationship with you has ended, taking into account our legal obligations and regulators' expectations. We envisage that most details will be retained indefinitely until the Fund terminates, but will keep this under review. We may also retain records to investigate or defend potential legal claims.

## **4. YOUR RIGHTS**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us.

## **5. INTERNATIONAL DATA TRANSFER**

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under data protection law. Where your personal information is to be transferred outside the UK (for example by the administrator) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

## **6. CHANGES TO THE POLICY**

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date.

## **7. HOW TO CONTACT US**

The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact the Secretary to the Trustee at our Fareham address shown at the end of this notice. If you believe that we have not resolved your concerns, you can complain to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

We encourage you to let us know if your personal information changes or you think the information we hold about you is out of date.

10 September 2024

Trustee's address: The Secretary to the Trustee, NAAFI Pension Fund, c/o NAAFI, Forum 5, Solent Business Park, Parkway, Whiteley, Fareham, P015 ?PA

Trafalgar House's address: NAAFI Pension Fund, c/o Trafalgar House Pensions Administration Limited, PO Box 119, Blyth, NE24 9E