

ROYAL COLLEGE OF MUSIC PENSION AND ASSURANCE SCHEME

DATA PRIVACY NOTICE

Date: May 2018 (revised June 2022)

This privacy notice describes how Capital Cranfield Pension Trustees Limited, the Trustee of the Royal College of Music Pension and Assurance Scheme (the "Scheme") collects, stores and processes personal information in order to administer your benefits under the Scheme.

The Trustee is required to provide you with the information set out in this notice. You do not need to take any action as a result of receiving this notice.

Data Controllers

Under data protection law, the Trustee is a "data controller" in respect of the Scheme. The Trustee decides how it collects, holds and uses personal information about you. Collecting, holding and using personal data is called "processing".

The Scheme's Actuary is also a data controller in respect of the pension data that they have in their control. Like the Trustee, the Actuary is responsible for keeping any of your personal data that it holds safe and secure in accordance with data protection law. The contact details for both the Trustee and the Actuary are set out below, along with a link to the web address where the Scheme Actuary retains their own privacy notice, setting out details of the data they hold, how that data is used and the legal basis upon which they hold that data. In order to fully understand how and where the Scheme Actuary uses your data, it is recommended that you visit the Scheme Actuary's website and review its privacy notice.

Trustee

Capital Cranfield Pension Trustees Limited
2nd Floor
42 New Broad Street
London EC2M 1JD
j.woods@capitalcranfield.com

Scheme Actuary

Gail Higgins
Suite 9
The Portway Centre
Old Sarum Park
Salisbury SP4 6EB
gail.higgins@censeo.uk.com

<http://www.censeo.uk.com/privacy-policy.aspx>

If you have any questions for the Trustee or the Scheme Actuary about data protection or the exercise of your rights, , please raise your questions with Premier, the Scheme's administrators, in the first instance at:

Web: <https://premieradministration.co.uk/self-service/>

Email: admin@premiercompanies.co.uk

Telephone: 0800 122 3200 (from outside of the UK +44 20 3727 9850)

What Personal Data do we hold?

We could hold both basic and sensitive data about you and your potential beneficiaries.

- name, address, date of birth, telephone number and email address;
- National Insurance number;
- service history of the member, while employed by the sponsor of the pension scheme
- salary, details of any period of absence and working hours;
- marital status and details of any dependants and/or potential beneficiaries;
- bank details;
- information relating to your health, if you have shared this with us; and
- any other personal data which may be needed to process your benefits and are needed for the proper running and administration of your pension scheme

If we did not have this information, you or your family might not receive the benefits to which you are entitled.

How do we collect this data?

Some of this data is or will have been collected directly from you (for example, when filling in forms about your pension scheme membership, or when corresponding with us or our representatives by telephone, post, email or otherwise). If you visit our website, it will automatically collect some data about you and your visit, including your IP address, your browser type and the pages on the site that you visit.

We may also collect some data from third parties, for example from the sponsoring employer of the Scheme and previous administrators of the Scheme. We may also occasionally obtain or have obtained data about you from other external sources (for example, HM Revenue and Customs).

In order for us to comply with our legal obligations, please notify Premier of any changes to your personal details (e.g. address, email or other details) as soon as possible. Failure to provide it could mean we are unable to process your benefits.

How do we use your personal data?

We use your personal data for a variety of reasons.

- Valuing your pension, the options available to you, the value of the Scheme as a whole, the levels of funding that the Scheme needs and the investment plan for the Scheme;
- Maintaining records for the purpose of payment of pensions on your retirement (or earlier / later due to ill-health or other reasons, as requested by you and agreed by the Trustee;

- Making Trustee decisions, such as whether to agree to early payment, or how to distribute benefits after your death;
- Calculating and paying your benefits. The payment(s) may be to you as a member of the Scheme or to your spouse, children or any other legitimate recipient;
- Communication of information in regards to these payments, alternatives to these payments, changes to these payments, changes to your Scheme, changes to the services and legislatively required information or legislative updates;
- Analysis of statistics and member feedback for Trustee reporting and service improvements.

Lawful grounds for using your information

The Trustee will process your data only where there is a legal basis for that processing. We have described the reasons for which we may use information about you or other relevant individuals. We are permitted to process such information in this way, in compliance with data protection legislation, by relying on one or more of the following bases, depending on the context:

- the processing is necessary for the Trustee to comply with its legal obligations or
- the Trustee has a legitimate interest in processing the information in order to administer the Scheme.

In relation to any sensitive personal data relating to you (for example, in respect of ill-health early retirement options) , we will normally rely on the 'legal claims basis' in order to process such information. We may also rely on exceptions permitted by the legislation, for example, if you are physically unable to give your consent.

Where you have consented to our processing of such information (including sensitive categories of personal data) you may withdraw such consent at any time, by contacting us using the contact details below. Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described above is applicable. Please note that not providing or withdrawing consent could mean that we have insufficient evidence to assess your eligibility or continued eligibility for certain benefits.

Keeping your personal data

We keep your personal data for as long as reasonably necessary to administer your benefits under the Scheme. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required. Because trustees of pension schemes can face complaints or questions from members, former members, other individuals or regulatory authorities many years after a member / beneficiary has ceased to be entitled or prospectively entitled to benefits, we will hold some personal data as long as it is seen to be required to defend against potential future legal claims (for example, to show how the liability for your benefits was discharged).

Automated Processing

We do not carry out automated decision-making or profiling in relation to your personal data.

Sharing your personal data

It is our policy to protect your right to privacy and we will ensure that adequate technical and organisational security measures, confidentiality obligations and compliance procedures are at all times in place to prevent inappropriate use of personal data.

We may share data with third parties for the purposes described in this notice, subject to the policies and procedures we have in place to keep your data safe.

In particular, data may be disclosed to the following third parties:

- the Scheme's sponsoring employer;
- people associated with the Scheme members;
- Premier, as the Scheme's administrator;
- the Trustee's actuary, legal advisers, accountants, auditors and investment consultants;
- tracing agencies and communications service providers;
- insurance companies (for example if the Trustee were insuring your benefits through an individual or group annuity policy or life insurance policy);
- investment managers or fund providers and
- third parties to whom we are required to transfer data by law or regulatory requirements (e.g. government and regulatory authorities).

The Trustee also provides data to HM Revenue & Customs, for tax when you are paid benefits, and for the purpose of administering your benefits if you have been contracted out of the State second pension.

However, we will only disclose personal data where this is reasonably necessary for the purposes of the proper running and administration of the scheme, including the provision of benefits in respect of you from the pension scheme, or where otherwise required by law or regulatory requirements.

Sharing your personal data outside of the EEA

Information about you or other relevant individuals in our possession may be transferred to other countries (which may include countries outside the European Economic Area) for any of the purposes described in this notice. These countries may have differing (and potentially less stringent) laws relating to data protection and may not offer the same level of protection for personal data as provided within the European Economic Area so we will put in place appropriate safeguards to ensure that your information remains adequately protected, and require the organisations we deal with to do the same.

Know your rights

General Rights

You and other relevant individuals have a number of rights concerning the way that we use your information. You are responsible for ensuring that other relevant individuals are aware of these rights. At any time, you and any such individuals shall have the right:

- to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated

decision-making, including profiling, and the logic, significance and envisaged consequences);

- to request access to, or a copy of, any personal data we hold about you;
- to request the rectification of your personal data, if you consider that it is inaccurate.;
- to request the erasure of your personal data, if you consider that we do not have the right to hold it;
- to object to your personal data being processed for a particular purpose or to request that we stop using your information (however please note that this does not apply where the processing is necessary for the Trustee to fulfil its legal obligations);
- to ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible and otherwise required by applicable regulations; or
- to withdraw, at any time, any consent that you have previously given to us for our use of your personal data.

You also have the right to lodge a complaint with the Information Commissioner's Office if you believe your data is being processed unlawfully. The contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Website: www.ico.org.uk
Telephone: 0303 123 1113 or 01625 545 745
Email: casework@ico.org.uk

Access to Your Information

You and other relevant individuals may have a right of access to some, or all, of the information we hold about you or them, or to have any inaccurate information corrected, under the data protection legislation. Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with data protection legislation. We will comply with our legal obligations as regards any individual's rights as a data subject.

We aim to ensure that the information we hold about you or other relevant individuals is accurate at all times. To assist us in ensuring that such information is up to date, please let Premier, the Scheme's administrator, know if the personal details of you or other relevant individuals change by contacting us using the contact details below. We will correct any incorrect or incomplete information and will stop processing personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

Web: <https://premieradministration.co.uk/self-service/>

Email: admin@premiercompanies.co.uk

Telephone: 0800 122 3200 (from outside of the UK +44 20 3727 9850)

Please note that a request for us to erase your personal data or to restrict / stop us processing your personal data could impact our ability to provide your pension benefits.