**FULL PRIVACY NOTICE**

For the members and beneficiaries of the Northamptonshire Pension Fund

This privacy notice is for members and beneficiaries of the Northamptonshire Pension Fund (the **"Fund"**). It has been prepared by West Northamptonshire Council (WNC) (the **"Administering Authority"**, or **"we"**) in its capacity as the administering authority of the Fund (registration number ZA896620). This privacy notice describes how we collect and use personal data in accordance with data protection laws. The Administering Authority is registered as a controller of personal data with the Information Commissioners Office ("**ICO**").

This privacy notice is also available on the Fund's website at the following link:

[Key documents (NCC) - Cambridgeshire and Northamptonshire LGPS (westnorthants.gov.uk)](https://pensions.westnorthants.gov.uk/governance/key-documents/northamptonshire/)

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.

1. **Why we are providing this notice to you**

As the Administering Authority of the Fund we hold certain information about you and from which you can be identified (either from the information itself or with other information that we may hold) (**"personal data"**) which we use to administer the Fund and to pay benefits from it. In line with the transparency requirements of applicable data protection laws, we are required to give you specified information about the personal data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it. This notice is designed to give you that information.

1. **Why we process your personal data**

The Administering Authority processes personal data about you, in its capacity as a controller, for the proper handling of all matters relating to the Fund, including its administration and management calculating, securing and paying benefits and managing liabilities in relation to it. This includes the need to process your data to contact you, to calculate, secure and pay your benefits, for statistical and financial modelling and for reference purposes (for example, when we assess how much money is needed to provide members' and beneficiaries' benefits and how that money should be invested), and to manage liabilities and administer the Fund generally. Further information about how we use your personal data is provided in the Schedule.

The legal 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. However, where that legal basis does not apply then the legal basis for our use of your personal data will be one or more of the following:

1. 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]
2. 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]
3. [because we need to process your personal data to meet our contractual obligations to you 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].

Where Health Information is being processed for the purpose of assessing eligibility for benefits from the Fund, we will rely upon the data subject's explicit consent as the lawful condition for that processing. Where eligibility has been assessed and Health Information is retained for our own records, we will rely upon the following lawful conditions in addition to the legal bases specified above:

* The processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law.
* The processing is necessary for the establishment, exercise or defence of legal claims.

Where Criminal Information is being processed, we will rely upon the following lawful conditions in addition to the legal bases specified above:

* The processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection law.
* The processing is necessary for the purposes of establishing, exercising or defending legal rights.

1. **What personal data we hold, and how we obtain it**

Please refer to the Schedule for information concerning the types of personal data we hold and process about you.

We obtain some of this personal data directly from you. We may also obtain data (for example, salary information) from your current or past employer(s) or companies that succeeded them in business, from a member of the Fund (where you are or could be a beneficiary of the Fund as a consequence of that person's membership of the Fund)and from a variety of other sources including data tracing agencies, public databases, our advisers, additional voluntary contribution (AVC) arrangement providers, and government or regulatory bodies.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Fund, please ensure that those individuals are aware of the information contained within this notice.

1. **How we will use your personal data**

We may use this data to deal with all matters relating to the Fund, including its administration and management such as Prudential and Standard Life the Funds AVC providers. For further information, please refer to the Schedule.

1. **Organisations that we may share your personal data with**

From time to time we will share your personal data with advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Fund. Some of those organisations will simply process your personal data on our behalf and in accordance with our instructions; they are referred to as processors. In some instances, advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. The controllers may be obliged under the data protection laws to provide you with additional information regarding the personal data they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example via their websites.

Whenever one of our advisers or service providers acts as a joint controller with us in respect of your personal data, because we jointly determine the purposes and means of processing it, we will agree with them how we are each going to meet our respective and collective obligations under the data protection laws. If you would like more information about how such an arrangement works, please contact us using the contact details below.

The organisations that we may share your personal data with may include the following advisers and service providers (for some advisors/providers we have provided links facilitating access to their privacy notices, which provide information about how they address their obligations in relation to personal data):

* Legal advisers currently Squire Patton Boggs (UK) LLP. Their privacy policy can be found via <https://www.squirepattonboggs.com/en/footer/privacy>
* Actuarial consultants currently HymansRobertson. Their privacy policy can be found via <https://www.hymans.co.uk/information/privacy-notice/>
* The Fund's Data Protection OfficerBellinda Cotton.
* Statutory auditor currently Grant Thornton.
* Internal auditorsworking in partnership with Cambridgeshire County Council and rotate between Administering Authorities on an annual basis.
* External auditor currently Grant Thornton. Their privacy policy can be found via [Privacy | Grant Thornton](https://www.grantthornton.co.uk/privacy/)
* Pensions software providers currently Heywood Pension Technologies. Their privacy policy can be found via <https://www.heywood.co.uk/privacy-notices>
* Overseas payments provider to transmit payments to Fund members and beneficiaries with non-UK accounts currently Convera UK Financial Limited. Their privacy policy can be found via <https://convera.com/en-gb>
* Investment advisers currently Mercer. Their privacy policy can be found via <https://www.mercer.com/en-gb/footer/privacy-notice/>
* AVC arrangement providers, currently:
  + Prudential. Their privacy policy can be found via [prudential-plc-privacy-policy-oct2019.pdf (prudentialplc.com)](https://www.prudentialplc.com/~/media/Files/P/Prudential-V3/content-pdf/prudential-plc-privacy-policy-oct2019.pdf)
  + Standard Life. Their privacy policy can be found via [Our Privacy Policy | Standard Life](https://www.standardlife.co.uk/privacy)
* Tracing bureaus for mortality screening and locating members and beneficiaries currently Accurate Data Services.Their privacy policy can be found via <https://accuratedata.co.uk/privacy-policy/>
* The Fund's bank is currently Barclays.
* Printing companies currently PDS, CDS and PSL.
* Benefit consultants currently Hymans Robertson [Privacy notice - Hymans Robertson](https://www.hymans.co.uk/information/privacy-notice/)
* Suppliers of IT currently Heywood Pension Technologies for member self-service.
* Notification providers, currently
* Granicus [Privacy Policy | Granicus](https://granicus.uk/privacy-policy/#Where+Does+Your+Data+Go%3F)
* Government Digital Service [Government Digital Service privacy notices - GOV.UK (www.gov.uk)](https://www.gov.uk/government/collections/government-digital-service-privacy-notices)
* The Fund’s survey provider is Survey Monkey [Privacy Notice | SurveyMonkey](https://uk.surveymonkey.com/mp/legal/privacy/)

Where we make Fund investments or seek to provide benefits for members and beneficiaries in other ways, such as through the use of insurance, then we may also need to share personal data with providers of investments, insurers and other pension scheme operators.

From time to time we may provide some of your data to your employer and their relevant subsidiaries (and potential purchasers of their businesses) and advisers for the purposes of enabling those entities to understand the liabilities and obligations of employers regarding the Fund. Your employer would generally be a controller of the personal data shared with it in those circumstances. For example, where your employment is engaged in providing services subject to an outsourcing arrangement, the Administering Authority may provide information about your pension benefits to your employer and to potential bidders for that contract when it ends or is renewed.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to:

* The Department for Work and Pensions;
* The Government Actuary's Department;
* The Cabinet Office – for the purposes of the National Fraud Initiative;
* HMRC;
* pensions dashboards (for further information about pensions dashboards, please refer to the Money & Pensions Service website (https://maps.org.uk/en/our-work/pensions);
* government bodies, regulators and dispute resolution and law enforcement organisations (including the courts, the Pensions Regulator and the Pensions Ombudsman); and
* Administering Authorities of other Local Government Pension Schemes (or their agents, such as third-party administrators) of which you have been or will be a member, where the information is required to administer benefits payable in respect of your membership of the Local Government Pension Scheme.

They may then use the data to carry out their functions.

The advisers, service providers or organisations referred to in the paragraphs above may use the personal data to perform their functions in relation to the Fund as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

[We do not use your personal data for marketing purposes and will not share this data with anyone for the purpose of marketing to you or any beneficiary.]

1. **Transferring personal data outside the UK**

In some cases, recipients of your personal data may be outside the UK. This may include to transmit payments to Fund members and beneficiaries with non-UK accounts, Convera is currently used for this purpose.

It may also include affiliates / overseas offices of the Fund's service providers, includingPrudential who have a global network . This means your personal data may be transferred outside the UK to a jurisdiction that may not offer an equivalent level of protection as is provided in the UK.

Additional safeguards are in place to protect your personal data when we (or service providers who process personal data on our behalf) transfer it outside the UK as at least one of the following measures is relied on:

* the transfer is to a country that has been deemed to provide an adequate level of protection for personal data by the UK Secretary of State; or
* standard contractual clauses (approved by the relevant governmental or supervisory authority) are in place with the recipient of the data, requiring your personal data to be safeguarded in accordance with applicable laws.

Please contact the Administering Authority using the contact details below if you require further information.

1. **How long we keep your personal data**

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above and detailed further in the Schedule for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Fund (unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations). In practice, this means that your personal data will be retained for the greater of:

* such period as the Member (or any beneficiary who receives benefits after the Member's death) are entitled to benefits from the Fund and for a period of 15 years after those benefits stop being paid; or
* 100 years from the 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.

1. **Your rights**

You have a right to **access** and **obtain** a copy of the personal data that the Administering Authority holds about you and to ask the Administering Authority to **correct** your personal data if there are any errors or it is out of date or incomplete.

In some circumstances*,* you have a right to ask the Administering Authority to **erase** your personal data where:

* you believe we no longer need to process the personal data for the purposes identified above and detailed further in the Schedule;
* you had given consent to the processing of the personal data but you subsequently withdraw your consent and there is no other lawful basis upon which we can process the personal data;
* the personal data has been processed unlawfully or it has not been erased when it should have been; or
* you have been successful in objecting to the processing.

You should note, however, that we are not obliged to erase your personal data if we need to process it in order to comply with our legal obligations as the Administering Authority of the Fund, or in order to carry out a task in the public interest or for the exercise of official authority vested in us.

In some cases, you may also have a right to request that the processing of your personal data be **restricted** or to **transfer** your personal data (for example, to another pension scheme).

In certain circumstances, you also have the right to **object** to the processing of your personal data, for example:

* where our lawful basis for processing your personal data is that the processing is necessary in order for us to carry out a task in the public interest or for the exercise of official authority vested in us;
* where we rely on legitimate interests as our lawful basis for processing; in which case, we must carry out an exercise balancing our legitimate interests with your rights and freedoms as a data subject (if you disagree with the outcome of that balancing exercise you have the right to refer the matter to the ICO); or
* where the processing is for direct marketing purposes.

Where we rely upon your consent to lawfully process your personal data, including explicit consent, you have the right to **withdraw your consent** to the processing at any time by notifying the Administering Authority in writing. Withdrawal of consent will not affect the lawfulness of processing based on your consent before it is withdrawn.

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 its telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Data Protection Officer using the contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Administering Authority's processing activities with the Information Commissioner's Office which you can do through the website above or their telephone helpline.

As explained in this privacy notice, one of the reasons we collect and hold your personal data is to administer your Fund benefits. If you do not provide the information we request, withdraw your consent to the processing, or ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits, including the payment of benefits from the Fund. In some cases it could mean the Administering Authority is unable to put your pension into payment or has to stop your pension (if already in payment).

1. **Updates**

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

1. **Contact details**

Contacting us

Please contact us if you wish to exercise any of your rights under data protection laws, or if you have any queries relating to the processing of your personal data in connection with the Fund using the contact details below.

[Pensions@westnorthants.gov.uk](mailto:Pensions@westnorthants.gov.uk)

Contacting our Data Protection Officer

You may also contact our data protection officer for further information using the contact details below.

[dataprotection@westnorthants.gov.uk](mailto:dataprotection@westnorthants.gov.uk)

The reference number for this Privacy Notice is PNS/24/029/H

**SCHEDULE**

**The Personal Data we hold relating to scheme membership and how and why we process it.**

| **PRIMARY USE OF YOUR PERSONAL DATA** | **PERSONAL DATA WE HOLD** | **EXAMPLE USES OF YOUR PERSONAL DATA** |
| --- | --- | --- |
| **Administering and managing the Fund and the liabilities under it** | Name, date of birth, sex, gender, address, telephone number, email address, national insurance number, employee and membership/reference numbers and copies of documentation verifying your identity. ("**General Information**")  Bank account details, tax details. **("Financial Information")**  Information about your family and dependents, including your marital status, dependant details, next of kin, and information about your personal relationships. ("**Family Information**")  Information used to calculate and assess eligibility for benefits, such as details of pension contributions, employment history, length of pensionable service, fund retirement date, salary/remuneration information, investment choices, preferences regarding the distribution of death benefits, benefits accrued in, paid out or transferred to/from this (and other) pension arrangements, tax and contracting-out records. ("**Benefit Information**")  Additional personal data that we request from you in order to action a request from you to transfer your benefits out of the Fund. (**"Transfer Information"**)  Personal data concerning your health, or the health of another who may receive benefits as a consequence of your membership or benefits in the Fund. ("**Health Information**")  Personal data relating to criminal convictions and offences. ("**Criminal Information**") | To identify you and to create an accurate member record on our systems.  To correspond with and answer queries from you and your advisers.  To assess eligibility or continuing eligibility for benefits.  To calculate, adjust, allocate and pay benefits (including benefits payable in the event of your death).  To provide you with certain information which we either:  are legally required to provide you with; or  consider is relevant to you as a member of the Fund.  To report to and liaise with HMRC and facilitate the payment of any tax due in connection with your benefits.  Managing the investment of Fund and facilitating the investment of any money purchase pension savings you may have which are linked with the Fund (including in AVC arrangements).  To assess and, if appropriate, action a request you make to transfer your benefits out of the Fund.  To identify your potential benefit options and, where relevant, implement those options.  To calculate and reconcile contributions paid or payable.  Ensuring compliance with requirements arising from members of the Fund contracting-out of the State Second Pension.  Preparation of Fund accounts, valuations and audits.  The operation and maintenance of and provision of information via the Fund website.  To allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements.  To manage the Fund's liabilities, including the entering into of insurance arrangements, arranging for insurers to take over responsibility for the payment of benefits, and the selection of Fund investments.  For statistical and financial modelling and reference purposes.  To liaise with, or respond to orders or requests from  the Pension Protection Fund; and  government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman, and HMRC.  To comply with our duties in respect of pensions dashboards (for further information about pensions dashboards, please refer to the Money & Pensions Service website ([https://maps.org.uk/en/our-work/‌pensions](https://maps.org.uk/en/our-work/pensions))). |
| **Addressing any actual or potential disputes relating to the Fund or connected with your membership or benefit entitlements under the Fund** | **General Information**  **Financial Information**  **Family Information**  **Benefit Information**  **Transfer Information**  **Health Information**  **Criminal Information** | To respond to or deal with any queries, concerns and disputes which relate to the Fund, your membership of or benefit entitlements under the Fund. This shall include actual or potential disputes raised under the Fund's Internal Dispute Resolution Procedure, or with the Pensions Ombudsman or the courts. |
| **Liaison with current or former sponsoring employers of the Fund (including in connection with a corporate transaction)** | **General Information**  **Financial Information**  **Family Information**  **Benefit Information**  **Health Information**  **Criminal Information** | To correspond with the sponsoring employers of the Fund in connection with your employment, their obligations as employers, or changes to the Fund or benefits payable from the Fund.  To process your personal data in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Fund and their group companies |