



## DB PENSION SCHEME PRIVACY NOTICE

### FOR THE BUCCLEUCH ESTATES LTD 1974 RETIREMENT FUND

We collect and process personal data relating to DB pension members in order to manage the scheme and ensure the correct benefits are applied. We take the security and privacy of your personal information seriously and are committed to be transparent about how we collect and use your data, and to meeting our data protection obligations.

This privacy policy will give you a clear understanding of what kinds of personal information we collect, how we use the personal information that you provide and our measures for protecting it. It also outlines your subject access rights along with the options you have to control your personal information and protect your privacy.

This privacy policy was last updated on 18<sup>th</sup> April 2024

#### WHO WE ARE

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This privacy policy applies to **The Buccleuch Estates Ltd 1974 Retirement Fund**, and is collectively referred to as “the scheme”, “we”, “us” or “our” in this policy.

#### PERSONAL INFORMATION WE MAY COLLECT ABOUT YOU

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We collect and process a range of personal and sensitive information about you, however we will only collect the personal information that we need for the purposes of managing your membership of the pension scheme, making pension payments to you or your nominated beneficiary, and keeping records required by law or other statutory guidance. This may include:

- Information about who you e.g. your name, date of birth, sex, marital or civil partnership status, address and contact details
- Information about your correspondence with us e.g. phone calls, emails/letters
- Your employment history (including start and end dates) and salary
- Records of pension payments (if applicable) including bank account and national insurance information
- Your pension records including membership, contributions, information relating to your spouse and dependents, copies of birth and marriage certificates, financial information relating to your entitlements, and, in the event of your death, information provided by your solicitor or the executor of your will
- Any other relevant information required in connection with your pension
- Information that is automatically collected e.g. via cookies when you visit the pension website

## HOW WE COLLECT AND STORE YOUR PERSONAL INFORMATION

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We collect your personal information in a number of ways, for example:

- From you – via documents you provide us with, forms you complete or through correspondence or other interactions
- From third parties including, but not restricted to, HMRC and our pension advisers.

Your information is stored in a range of different places including secure paper files, our HR information system (MyHR), archive records, our payroll and finance software and in other IT systems such as networked folders and our email system. Your data may also form part of reports or documents prepared for legitimate business purposes.

## HOW WE USE YOUR PERSONAL INFORMATION

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We use your data to meet our obligations under your membership of the pension scheme and comply with legal or statutory obligations.

## WHO WE MAY SHARE YOUR DATA WITH

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Your information will be shared internally, including with some or all of: HR, payroll, senior finance team members and those administrating the DB scheme.

We also share your information with third parties where necessary, such as, but not restricted to:

- The Board of Directors of the pension scheme
- The scheme and parent company auditors
- The scheme advisers
- Statutory or regulatory bodies where we have an obligation to do so e.g. HMRC or Department for Work and Pensions
- Providers of benefits you may be entitled to e.g. life assurance

## HOW WE PROTECT YOUR PERSONAL INFORMATION

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We take the security of your personal information seriously and have adopted appropriate safeguards to ensure the data we collect, store or process, whether on paper, online or any other media, is protected in line with our data protection obligations.

We have implemented appropriate technical and organisational security measures, including on-going training, to protect your personal information against any unauthorised or unlawful processing and against any loss or damage through accident, negligence or deliberate actions.

Access to your data is restricted to those that have a legitimate need to access and there is a clear policy regarding the storage of data. Restrictions in place can include:

- Access to networks restricted by password
- Restrictions on the access to access certain folders or files
- Password protected equipment
- Additional password requirements for some software
- Facilities for secure data disposal
- Paper files being kept in a secure location

Third party infrastructure providers who host and provide IT support in respect of our software may have access to your information from time to time and we have agreements in place to ensure data is protected in line with the GDPR requirements.

Where we share your personal data with third parties as outlined above, agreements are in place regarding the use and protection of your data in accordance with GDPR.

Our security measures have been developed in line with industry standards and good practice, safeguarding against the risks to the privacy, integrity and availability of your personal information.

## HOW LONG WE KEEP YOUR PERSONAL INFORMATION

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We will only use and store your information for as long as it is required for the purposes it was collected. How long it will be stored depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

Your data will ordinarily be held for up to seven years after the date of death. In some cases, we may need to keep your data for longer if you predecease a spouse.

## YOUR INDIVIDUAL RIGHTS

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There are several rights you have to gain access to or amend the information that we hold on you. You can:

- Access and obtain a copy of your data on request
- Require us to change incorrect or incomplete data
- Require us to delete or stop processing your data, e.g. where the data is no longer necessary
- Object to the processing of your data for one or more purposes
- Ask us to stop processing your data for a period of time if the data is inaccurate or there is a dispute about whether your interests override our legitimate grounds for processing it

If you would like further information on your rights, to exercise your subject access right or you wish to exercise the rights mentioned above please email [kbarclay@buccleuch.com](mailto:kbarclay@buccleuch.com) or write to us at:  
Data Protection, Buccleuch, 27 Silvermills Court, Henderson Place Lane, Edinburgh, EH3 5DG

If you believe we have not complied with your data protection rights you can contact the Information Commissioner.