



Privacy Notice for Members of the Fund

The Buccleuch Estates Limited 1974 Retirement Fund "Fund"

Who we are

The Buccleuch Estates Pension Trustee Company Limited is the formally appointed Trustee of the above pension Fund.

Purpose of this statement

This privacy statement explains how we as Trustee of the above Fund collect, hold and use any personal data about you and where applicable, your dependants and beneficiaries where you have provided us with this data. Personal data means any information from which an individual can be identified and includes data held either electronically on a computer system, or in paper format.

For legal purposes the Trustee of the Fund is known as the "Data Controller" as it decides the purposes and means by which personal data held is processed. There may be other advisers to the Fund also, such as the Fund's Actuary, legal advisers, investment managers, and auditors, who may also be classed as "Data Controllers" or "Joint Data Controllers" with the Trustee to the extent that they too determine the purpose and means of processing personal data. As Data Controllers any personal data held must be processed fairly and lawfully.

Why we hold data

We hold data in respect of you in order to administer the Fund. Any data in respect of you, your contingent dependants or beneficiaries is held for the purposes of the ongoing maintenance of your pension record and the calculation and payment of benefit entitlements.

We confirm therefore that we have a specified, explicit and legitimate reason for holding and processing personal data in respect of you and also have a legal obligation to do so under the terms of the rules of the Fund and pensions legislation. Under the data protection regulations these reasons are known as a "legal obligation" and a "legitimate interest" for processing data.

What type of data do we hold?

The personal data we hold relates to your membership of the Fund as either an active, a preserved, or a pensioner member, or as a spouse/civil partner/dependant or a child over age 18. Listed below are the categories of your data we hold with some examples of the types of information held in each category:



All members

Personal details – title, name, membership number, date of birth, gender, NI number, address and postcode, email address, telephone number, mobile number.

Marital status details – single/married/civil partner/separated/divorced.

All Members (except children)

Data relating to contracting out of State pension arrangements (if applicable).

Active, Preserved and Pensioner member data

Benefit Nomination details in the event of your death.

Data held in respect of Active membership

Employment details – name and address of your current employer, your job title, department, location, history of your employers who participate/d in the Fund.

Fund membership details – member category, pensionable service dates, normal retirement date, fund specific benefit bases.

Pensionable Salary/remuneration details – a history of data held used to calculate pension benefits.

Pension Contribution details (if applicable) – annual and total contributions paid.

Additional Voluntary Contribution details (if applicable) – Policy number, contributions paid, fund value, any amount paid as a lump sum.

Other benefits – retained benefits, transferred in benefits, benefit augmentations.

Investments (if applicable) – investment choices, allocation of investments, investment values.

Pension Tax Allowances (if applicable) – Annual Allowance, Money Purchase Annual Allowance, Tapered Annual Allowance, unused Annual Allowance, Lump Sum Allowance and Lump Sum Death Benefit Allowance.

Protected benefit details (if applicable) – Primary, Enhanced, Fixed, or Individual protection.

Preserved member data – in addition to the Active member data above if you left/leave the Fund before drawing your benefits the following data will also be held in respect of you

Preserved pension details – amount of preserved benefits.



Pensioner member data – in addition to the Active member or Preserved member data above (if applicable), if you commence/have commenced to draw your benefits the following data will also be held in respect of you

Benefit details – amount of your pension, amount commuted, amount of tax free lump sum taken (if applicable) and residual pension, any partially or wholly insured benefits.

Insured benefits (if applicable) – any partially or wholly insured benefits payable to you in respect of your Scheme membership.

Any dependant benefits purchased by you via the Fund.

Pension Tax Allowances – Any Lump Sum Allowance and Lump Sum Death Benefit Allowance used when you started to draw your benefits.

Spouse/Civil Partner/Dependant member data – as a spouse/civil partner/dependant – in addition to the data above which will be held in respect of your former spouse/civil partner and which is linked to your benefit record, the following data will also be held in respect of you

Insured dependant benefits (if applicable) – any partially or wholly insured benefits payable to you in respect of your late spouses/civil partners Fund membership.

Spouse/civil partner/dependant benefits including (if applicable) any purchased dependant benefit

Death benefit (if spouse/civil partner/dependant benefit payable) – details of any amount paid (if applicable) and to whom the benefit was distributed, and Life –Time Allowance used.

Children over the age of 18 – if you are aged over 18 and in receipt of a child benefit – in addition to the data which related to the former Fund member and/or your parent/guardian which is linked to your record, the following data will also be held in respect of you

Child benefit – amount of child benefit payable and expected cessation date.

Education details – details of educational course being undertaken, type of and address/postcode of educational establishment.

For all members with benefits in payment

Payroll data – name, address, postcode and sort code of your bank/building society, account number, history of payments and PAYE tax deductions made, tax code, information sent to you/HMRC, any special payments made.

Increases – increases paid to any increasable elements of your benefit since commencement date.



What happens to your data?

In order to administer the Fund it is necessary to collect and share your data with certain other parties so that they may process the data on the Trustee Board's behalf. We confirm however that data will only be shared with parties where the Trustee has a legal obligation or a legitimate interest in doing so under the rules of the Fund, or in accordance with legislative, governance and reporting requirements, or where it is necessary to process data to pay benefits. This may include reporting/sharing information with HM Revenue & Customs, National Insurance Contributions Office, Department of Work & Pensions, the Pension Protection Fund, the Pensions Ombudsman, the Pensions Regulator, as appropriate.

The data held in respect of you will not be divulged, transferred to, or shared with any third party other than those parties formally contracted to act on behalf of the Trustee in relation to the governance and administration of the Fund, the Fund rules or as required by pensions law.

Where do we obtain your data from, who do we share your data with and for what purpose is it processed?

For your information data already held by the Trustee as Data Controller will be/has been obtained from either you personally or your employer who participates in the Fund, or a relative/guardian and will be/is processed by the following parties in accordance with the formal contracts held between these parties and the Trustee.

We list below the parties who hold and process your data on behalf of the Trustee and the reasons for doing so:

AVC provider – if applicable, information will be held and processed about you by an AVC provider contracted to invest your voluntary contribution monies on your behalf by the Trustee.

Fund administrator – information about you will be held and processed by the fund administrator contracted to undertake the day-to-day administration of the Fund.

Actuarial services provider including the Fund Actuary – appointed by the Trustee – data will be held and processed in respect of you in order to undertake Fund annual funding updates and triennial valuations to assess the value of benefits and the funding position of the Fund.

Investment Manager – if applicable, data relating to your pension funds/units will be passed to and processed by an Investment Manager.

Auditor – annual audits are undertaken, relating to the Fund, and your data may be reviewed by both internal and external auditors commissioned to undertake the audit by the Trustee or Cartwright as administrators.

Legal advisor – if applicable, your data may be reviewed by a legal adviser on behalf of the Trustee.

Pensions Dashboard – Where the scheme is connected to a dashboard (either as required by legislation, or voluntarily) data may be shared with and processed via the dashboard ecosystem.

Government bodies – The following government and regulatory bodies may also hold or process your data: HM Revenue & Customs, National Insurance Contributions Office, Department of Work & Pensions, Pension Protection Fund, the Pensions Ombudsman, and the Pensions Regulator.



Your Rights

Access to your information and correction

You have a right to request a copy of the information that we as the Trustee, holds about you. If you would like to access the data/information held in respect of you in relation to your Fund membership, please send a Data Access Request to:

Kathryn Barclay
Chair of the Trustee
On behalf of the Buccleuch Estates 1974 Retirement Fund
Buccleuch
27 Silvermills Court
Henderson Place Lane, Edinburgh
EH3 5DG

E-mail: kbarclay@buccleuch.com
Tel: 0131 524 0910
Mobile: 07834101383

Handling your personal data

If you are unhappy with the way we handle your personal data, you may raise a complaint, See contact details above.

We will acknowledge your complaint within 30 days of receipt and take appropriate steps to respond and resolve it as soon as possible.

Right to rectification and keeping your information up to date

We want to make sure your personal information is accurate and up to date and you may ask us to correct or remove information you believe is inaccurate.

Your right to restrict the processing of your personal information

If you wish the Trustee to restrict or limit the processing of some of your personal data or do not wish any of your personal data to be processed or wish to have all of your personal data removed from the Trustee records, it may be possible in certain exceptional and limited circumstances. However, this could severely affect your participation in the Fund, the Trustee ability to respond to any questions you may have about your benefits and ultimately could mean it would not be possible to calculate or pay accurate benefits for you from the Fund.



Retention of Data

We must keep all personal data safe and only hold it for as long as necessary. However, pensions are a long-term commitment, in that, members build up benefits over long periods of time and can be drawing them for thirty years, or more. It is the Trustee policy therefore to hold data in respect of you after you leave the Fund and after all obligation to pay benefits to you and/or any of your dependants under the Fund, has been extinguished.

However, we review the personal data held in relation to the Fund on a regular basis in accordance with our data retention/destruction Policy. If it is concluded that certain personal data is no longer needed, that personal data will be destroyed.

European Economic Area (EEA)

Where we process personal data held in respect of you outside the UK and /or EEA, we ensure there are appropriate safeguards in place to protect your data.

The Information Commissioner

If you believe that we are processing your personal data in a way which is inconsistent with the law or are not satisfied with responses to any query you raise with us, you may contact the Information Commissioner (formerly the ICO) whose helpline is 0303 123 1113.

For and on behalf of the Trustee of The Buccleuch Estates Limited 1974 Retirement Fund

November 2025