

## **KIER GROUP PENSION TRUSTEES LIMITED**

TRUSTEE TO KIER GROUP PENSION SCHEME, MAY GURNEY PENSION SCHEME, MOUCHEL STAFF PENSION SCHEME, MOUCHEL SUPERANNUATION FUND, MOUCHEL BUSINESS SERVICES LIMITED PENSION SCHEMES (FINAL SALARY AND MONEY PURCHASE SECTIONS) (THE "SCHEMES")

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

As Trustee of the Schemes 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.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

#### **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 Schemes' employers 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);
- (d) details about who you would like us to consider paying benefits to if you die;
- (e) your choice of fund for your contributions (and any contributions from your employer) to be paid into, where applicable.

##### **1.2 What information may we collect from other sources (such as your employer)?**

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).

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

The ways we use your information include:

- (a) identifying you and your survivors and updating your details as may be requested by you;
- (b) communicating with you;
- (c) calculating and paying your benefits or in relation to a transfer of your benefits;
- (d) making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death;
- (e) deciding how to invest contributions paid by you or your employer, if applicable.

We must have a legal reason to use your personal information. This will usually be one of the following:

- (f) to fulfil our legal obligations (including any contractual obligations), which includes making sure that your benefits are paid correctly;
- (g) to meet our legitimate interests to administer the Scheme efficiently;

(h) because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health (for example in relation to an application for ill-health early retirement), we need your consent to process your data. Where this applies, you may take back your consent at any time by contacting the Trustee Secretary, Gillian Graham, PSGS, Forbury Works, 37-43 Blagrave Street, Reading, RG1 1PZ, or [kgpt@psgovernance.com](mailto:kgpt@psgovernance.com).

## 2. **INFORMATION SHARING**

2.1 We may share personal information with:

- (a) the Schemes' administrators and our advisers (such as the scheme actuary) to facilitate the administration of the Schemes and your benefits;
- (b) Her Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund;
- (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.

2.2 We may also provide some of your personal information to Schemes' employer group companies to help them to make decisions relevant to their role as sponsoring employers. We will only do so to the extent we consider necessary for these purposes.

## 3. **SECURITY AND STORAGE**

We have in place security measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate. We cannot guarantee the security of any third party application you may use to transmit your data (e.g. internet browsers).

When sharing your personal information with our administrators or another third party we will take reasonable steps to ensure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purpose(s) we set out.

We will keep your personal information for at least as long as we have a relationship with you or your survivors. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. 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**

We may transfer and process your data outside of the UK. Where your personal information is to be transferred outside the UK (for example by the administrator) we will take reasonable steps to ensure 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 THIS 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. Updates are effective from the date on which they are notified to members.

7. **HOW TO CONTACT US**

- 7.1 The Trustees are the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact the Trustee Secretary by email at [kgpt@psgovernance.com](mailto:kgpt@psgovernance.com), or by post:

Gillian Graham  
Punter Southall Governance Services  
Forbury Works  
37 – 43 Blagrove Street  
Reading RG1 1PZ

- 7.2 If you believe that we have not resolved your concerns with respect to the protection of your data, you can complain to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)
- 7.3 We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.

26 April 2018

**Below is a brief description from our pension provider, Aon, on how they use your personal data in order to support us in the running of the scheme**

**AON HEWITT LIMITED “QUICK READ” PRIVACY NOTICE**

Aon Hewitt Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting us, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

26 April 2018