

**PRIVACY NOTICE**  
**for the British Tourist Boards' Staff Pension and Life Assurance Scheme**

This notice is for members and beneficiaries of the British Tourist Boards' Staff Pension and Life Assurance Scheme (the "Scheme"). It has been prepared by the Trustees of the Scheme ("Trustees", or "we") in their capacity as trustees of the Scheme.

This notice will also be made available online on the Scheme's website <https://www.btbpensionscheme.org.uk>

**Why we are providing this notice to you?**

As the Trustees of the Scheme we hold certain information about you ("personal data") which we need to administer the Scheme and pay benefits from it. We are required by law to give you certain information about the data we hold about you, how we use it, and what safeguards are in place to ensure it is protected. This notice is designed to give you that information.

**Why we hold your personal data?**

The Trustees process personal data about you, in our role as controller, for the proper handling of all matters relating to the Scheme, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it. Further information about how we process this data is provided under the heading "*How we will use your data*" below.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) we need to process your personal data to satisfy our legal obligations as Trustees of the Scheme;
- b) we need to process your personal data for the legitimate interests of: administering and managing the Scheme and liabilities under it; calculating and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustees have in relation to the Scheme; and/or
- c) the processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract.

**What data do we hold and from where do we obtain it?**

The types of data we hold and process about you include:

- Contact details, including name, address, telephone numbers and email address;
- Identifying details, including date of birth, national insurance number and employee and member numbers;
- Information relating to your membership of the Scheme that is used to calculate benefits, for example length of service and salary information;
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details;
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death; and,
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Scheme.

We obtain some of this personal data directly from you. We may also obtain data from your employer (for example salary information) and from a variety of other sources including public databases, our advisers, and government or regulatory bodies.

Where we obtain information concerning certain “special categories” of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustees in writing. However, if you do not give consent, or subsequently withdraw it, the Trustees may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

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

### **How do we use your personal data?**

We may use this data to deal with all matters relating to the Scheme, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you;
- to assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits;
- to identify your potential benefit options and, where relevant, implement those options;
- 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 comply with our legal and regulatory obligations as trustees of the Scheme;
- to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Scheme;
- the management of the Scheme’s liabilities, including the entering into of insurance arrangements and selection of Scheme investments;
- for statistical and financial modelling and reference purposes; and,
- in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Scheme and their group companies.

### **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 Scheme. These include the following:

- Administrators – currently Buck Consultants Limited and Buck Consultants (Administration & Investment) Limited (together “Buck UK Group”).
- Legal advisers to the Trustees – currently Squire Patton Boggs (UK) LLP. Their privacy policy, which sets out how they carry out their duties in relation to personal data can be found on their website: <https://www.squirepattonboggs.com/en>
- Scheme actuary - currently Steven Scott of XPS Pensions Group who are also the Scheme’s actuarial consultants. Further information on how they carry out their duties in relation to personal data is included at the back of this notice
- Investment advisers – currently Hymans Robertson LLP.
- Auditors – currently Haysmacintyre.

- Additional voluntary contribution providers - currently ReAssure, Utmost Life and Prudential.
- Scheme Secretary - currently Pegasus Pensions PLC.
- Tracing bureaus for mortality screening and locating members and beneficiaries.
- The Trustees' insurers.
- The Scheme's bankers – currently Lloyds Bank plc.
- Suppliers of IT, document production and distribution services.

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. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that 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.

We may also provide some of your data to the Scheme's employers – VisitBritain and VisitScotland and their advisers.

In addition, where we make Scheme investments or seek to provide benefits for Scheme members in other ways, such as through the use of insurance or pension scheme mergers then we may need to share personal data with providers of investments, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

The advisers, service providers and organisations referred to in the paragraphs above may use personal data to perform their functions 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.

Where requested or if we consider that it is reasonably required, we may also provide your data to government, dispute resolution and law enforcement organisations – including the Courts, the Pensions Ombudsman, the Pensions Regulator, the Pension Protection Fund and Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their legal functions.

In some cases, recipients of your personal data may be outside the UK. If this occurs, appropriate safeguards must be implemented with a view to protecting your data in accordance with applicable laws. Please contact the Trustees, using the contact details below, if you want information about the safeguards that are currently in place.

### **For how long do we keep your data?**

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme and for so long afterwards as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Scheme. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

## **Your rights**

You have a right to access and obtain a copy of the personal data that the Trustees hold about you and to ask the Trustees to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask the Trustees to erase or restrict the processing of your personal data, to object to processing or to request a transfer your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk) or via their 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 Trustees using the contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustees' processing activities with the Information Commissioner's Office, you can do this via the ICO's website or telephone helpline.

The personal data we hold about you is used to administer your Scheme benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the payment of benefits from the Scheme. In some cases, it could mean the Trustees are unable to put your pension into payment or have to stop your pension (if already in payment).

## **Updates**

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

## **Contacting us**

Please contact us at the following address:

British Tourist Boards' Staff Pension and Life Assurance Scheme  
Buck Admin Team  
Buck (Ipswich)  
P O Box 323  
Mitcheldean  
GL14 9BL

**Email:** [btb@buck.com](mailto:btb@buck.com)

### **How XPS uses your information**

The current XPS Scheme Actuary, Steven Scott FFA and XPS Pensions Group when providing defined benefits actuarial consulting services, are Data Controllers in common with the pension scheme trustees and so we share your personal information with XPS in order for them to provide these services. The XPS Privacy Information is available at <https://www.xpsgroup.com/legal-regulatory/privacy-policy/>.

The relevant notice for you is labelled “Combined Scheme Actuary & Actuarial Consulting privacy information”.

XPS Pensions Group may make changes from time to time so you should check the latest version of this Privacy Information occasionally.

We take your privacy very seriously and we ask that you read XPS’ Privacy Information carefully as it contains important information on:

- The personal information we share with XPS in relation to the services provided;
- What XPS does with your information;
- Who XPS may share your information with; and
- What rights you have regarding XPS’ holding of your information.

The Scheme Actuary may change. If you wish to know who the current Scheme Actuary is, please refer to the most recent scheme accounts, or contact the Trustees.