

INTER TERMINALS PENSION FUND PRIVACY NOTICE TO MEMBERS – EFFECTIVE FROM 25 MAY 2018

Who are we

Inter Terminals Pension Fund Trustee Limited (the “Trustee”), as the Trustee of the Fund, holds certain personal information (known as “personal data”) about Fund members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustee in running the Fund will be personal data (in other words, it is information from which you as an individual can be identified).

For legal purposes, the Trustee is known as the “data controller”, as it decides the purposes for and means by which the personal data it holds is processed. The Scheme Actuary, Mark Jackson of Lane Clark & Peacock LLP (“LCP”), is also a data controller in respect of your personal data that he uses to carry out his functions. LCP when acting in the capacity as the administrators of the Fund, as appointed by the Trustee, are “data processors”. For further information please see <https://www.lcp.uk.com/privacy-policy/>.

What information we collect about you

Depending on the circumstances and the stage of your membership, the Trustee may hold some or all of the following information about you:

- your name, address, gender and date of birth;
- your email address and telephone number;
- your pensionable pay, national insurance number and tax information including your tax code;
- details from any identification and similar documents supplied to the Trustee;
- copies of any correspondence with you;
- details of your bank account;
- details about your dependants and/or beneficiaries;
- details of employment and pension scheme membership such as dates of joining and leaving employment (including reason for leaving, where relevant to benefit calculations) and employment history (for example whether part-time or full-time, periods of absence and job title), periods of pensionable service, earnings and details of other benefits;
- details of pension contributions and benefits, such as compulsory and voluntary contributions, actual or potential defined benefits and defined contribution account information;
- medical and other details about your health;
- information provided within an expression of wish including details about your dependants and/or beneficiaries; and
- any other personal data held by the Trustee to run the Fund.

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How we use that information

The Trustee needs to hold and process information about you because it is needed for it to administer the Fund and to calculate and pay benefits. In legal terms, this means that the Trustee has a legitimate interest in holding and processing the above information. The Trustee also keeps the above information to allow it to comply with its legal obligations to meet its trust law duties and responsibilities as well as legislative and regulatory requirements affecting pension schemes. The Trustee will not collect any personal data from you that it does not need.

Personal data relating to the Fund is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

As part of running the Fund, the Trustee may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “special category data”). Under the legislation, special category data includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs and data concerning health or a person’s sex life or sexual orientation. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. In the situations that the Trustee needs to collect and process special category data, your explicit consent will be sought at that time.

Who the Trustee shares personal data with

The Trustee, the Scheme Actuary and LCP will share your personal data with each other as necessary to help administer the Fund.

The Trustee may also share your personal data with the following:

- directors of the Trustee, including employees of any corporate directors;
- your current, past or future employer;
- the Fund’s professional advisers, including the Fund’s actuary, auditors, accountants, medical advisers, investment adviser and lawyers, see below for further detail;
- the third parties who are responsible for the day-to-day administration of the Fund on behalf of the Trustee;
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities;
- the advisers and printers who help the Trustee prepare various communications the Trustee sends to you, such as the annual benefit statement;
- other service organisations such as tracing, archiving, distribution and IT providers;
- the Trustee’s appointed insurance companies for the purposes of additional voluntary contributions;

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- the Trustee's appointed payroll provider to effect BACS (the Bankers' Automated Clearing Service) transfers to your designated bank account.

If you require details of any of these advisers/providers please contact us using the details given below.

Further detail on sharing data with the Fund's professional advisers:

- the Scheme Actuary – as the Trustee is required by law to have the Fund's funding level assessed every three years. In order to do this, the Actuary needs certain Fund membership information, and details about contributions and investments. The Actuary also calculates transfer payments, retirement benefits and other Fund benefits on the Trustee's behalf;
- the Fund's investment managers – who advise the Trustee on the most appropriate investments for the Fund. From time to time, the Trustee may ask the investment managers to investigate specific investments so as to secure individual or a particular class of member benefits outside of the Fund (for example, through an annuity with an insurance company);
- the Fund's administrators, who are responsible for the day-to-day administration of the Fund, including processing contributions and paying benefits.

How long we keep personal data for

The Trustee must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, the Trustee must keep certain personal data (for example, details about the date a member joins the Fund, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may need to keep some of your personal data for the rest of your life (or the life of your dependants and beneficiaries, in the event that they receive benefits from the Fund) so that it has the information it needs in order to pay benefits due from the Fund and to answer queries relating to such benefits.

The Trustee reviews the personal data held in relation to the Fund on a regular basis in accordance with the Trustee's Data Protection Policy. If the Trustee concludes that certain personal data is no longer needed, that personal data will be destroyed.

Notwithstanding the foregoing the Trustee relies upon an email account operated by Inter Terminals Limited and all emails sent to and from any of Inter Terminals' email addresses will be kept in accordance with Inter Terminals' archiving protocols from time to time.

Your rights

- you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format;
- if at any point you believe that the personal data the Trustee holds about you is inaccurate or wrong, you can ask to have it corrected;

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- you can require the Trustee to restrict or limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved;
- you can object to your personal data being processed, although the Trustee can override this objection in specific instances;
- where you have given the Trustee your consent to processing your personal data, you can withdraw that consent at any time by notifying the Fund Secretary (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified;
- you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits and/or your participation in the Fund and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above, or
- make a complaint about how the Trustee has handled your personal data,

please contact pensions@interterminals.com and copy James Johnston, Secretary, at james.johnston@interterminals.com, or contact Lane Clark & Peacock, Scheme Administrators, at Team-InterTerminalsAdmin@lcp.uk.com.

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with the Trustee’s response to any query you raise with the Trustee, or you believe the Trustee is processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is the latest version effective from 25 May 2018. This notice will be updated from time to time and the current version at any time will be available for review on the Inter Terminals’ website, www.interterminals.com. As a general principal updates will not be sent to you.