

## **Trustees of the Ulster Independent Clinic Pension & Life Assurance Scheme Fair Processing Notice**

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

The data controller in respect of the personal data you submit to us either directly or via your employer, Ulster Independent Clinic Limited, are the Trustees of the Ulster Independent Clinic Pension & Life Assurance Scheme (the "Scheme") who you can contact via Mrs Nicola McGregor. We use your personal data that is provided to us to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants benefits. We therefore process your personal data on the legal basis that either the processing is necessary:

- for the performance of the contract of employment between you and Ulster Independent Clinic Limited regarding your participation in the Scheme;
- to comply with our legal obligations; or
- further to our legitimate interests as trustees of the Scheme.

If you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it.

We will transfer your data to Ulster Independent Clinic Limited, other participating employers in its group and their advisers, the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. Some of the Scheme's advisers, in particular the Scheme actuary, Scheme's legal adviser and the Scheme auditor will be data controllers in their own right in respect of the data we share with them. If you would like further details of those advisers and how they use your personal data, please contact the Trustees via the Pensions Administration Manager.

We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that Ulster Independent Clinic Limited sells its business or assets (in which case we may disclose your personal data to the prospective buyer), in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustees, the members of the Scheme, or others. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

Your personal data may be processed outside of the European Economic Area ("EEA") where required in order for us or Ulster Independent Clinic Limited to provide benefits to or in respect of you. In each instance, we have ensured that the processing of your personal data outside the EEA is protected in the same way as if it was being processed in the EEA by using one of the

following safeguards:

- transferring it to a non-EEA country with privacy laws that are recognised by the European Commission as giving the same protection as those within the EEA;
- ensuring that the processing of data is governed by the Standard Contractual Clauses approved by the European Commission; or
- for data sent to the USA, transfer it to organisations that are part of the Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA.

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data. As a general rule, your personal data will be retained for as long as the Scheme continues and for 15 years following its winding-up.

Data Protection legislation gives you the right to access information held about you. Where we or third parties are required by law to obtain your consent to the processing of your personal data you are entitled to withdraw your consent.

If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds. However, some data, for example data in relation to your health or personal life, is regarded as 'special categories of data' and cannot (unless a legal exemption applies) be used without your specific consent at the time. As the administrator of an occupational pension scheme, the Trustees have to process that special category data to perform their obligations under employment law and the law relating to social protection e.g. in relation to the award of benefits on death or ill-health. We understand this will be a valid legal exemption and we will not require your specific consent to process that data. To the extent that is not the case, we will ask for your consent to process 'special categories of data' but you should be aware that without that consent, we may be unable to administer your pension which may result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

From 25 May 2018, you will be entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise your data protection rights, including your rights to access, restrict, object to the processing of, rectify and erase your personal data by contacting the Trustees via Mrs Nicola McGregor. Please note that if you ask us to erase your personal data and we do not have a legal justification for retaining that data, we will be unable to administer your pension which will result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.