

Lloyd's Superannuation
Fund

Privacy Notice

4 February 2022

1 Who we are

LSF Pensions Management Limited is the trustee (“the Trustee”) of the Lloyd’s Superannuation Fund (“the LSF”).

As the Trustee of the LSF, we hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustee in running the LSF 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 we decide the purposes for and the means by which the personal data we hold is processed.

Owing to the nature of their role, the LSF Actuary and Barnett Waddingham LLP (the “Actuary”) when providing actuarial services, will be a joint data controller of the personal data relating to members of the LSF alongside the Trustee. The Trustee and the Actuary have allocated their responsibilities as follows:

- The Trustee – responsible for ensuring data is fairly and lawfully processed, is accurate and kept up-to-date, is not kept for longer than is necessary and is processed in line with data subject rights.
- The Trustee and the Actuary – responsible for ensuring data is only processed for limited purposes, is adequate, relevant and not excessive, is secure and is not transferred outside of the UK without adequate protections.

2 What information we can collect about you

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

- your name and date of birth
- gender
- your address
- your email address
- your marital status (including gender of your spouse/civil partner, and relevant certificates)
- your salary information (including employment dates and historic pay records)
- details about your pension benefits
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries so we can pay benefits following your

death (you may wish to share this notice with your dependant or beneficiary)

- medical and other details about your health that you have given us
- other legal documents, for example Power of Attorney

3 How we gather your personal information

We collect information from you when you provide information by telephone, post or email or when you enter information using the administrator's website service, BWebstream.

We may receive information about you from third parties including:

- other service providers and advisers of the Trustee
- your current or former employer
- regulatory agencies (such as HMRC)
- public databases such as the Register of Births, Deaths and Marriages
- other pension schemes, where transfers into the LSF have been made
- an independent financial adviser, solicitor or other person instructed by a person to provide us with information
- with your consent, from a registered medical practitioner
- from other third parties including, for example, your next of kin or anyone else entitled to benefit from your membership of the Scheme

We will not collect personal data that we do not need.

4 How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the LSF and to calculate and pay benefits and to email you with details about your benefits or general information about the Fund. We also keep the above information in order to allow us to comply with our obligations towards members under the LSF's governing documents, as well as under relevant legislation.

Personal data relating to members and beneficiaries of the LSF 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 LSF, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where

the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

5 What else we might do with personal data

We may transfer, store, or process your personal data outside of the UK. Where this is the case, we will take reasonable steps to ensure that your personal data continues to be appropriately secured. This may include entering into data transfer agreements based on approved model clauses to ensure that third parties commit to ensuring an adequate level of protection for your personal data. If you require information regarding the safeguards in place for transfers of personal data outside of the UK then please contact the Pensions Manager.

6 Who we share it with

As the Trustee needs help from various advisers to properly administer the LSF, we share personal data with the following:

- your current or past employer, or MS Amlin Corporate Services Limited (the current sponsoring employer of the LSF) and any other companies within the same corporate group
- the third parties who are responsible for the day-to-day administration of the LSF on behalf of the Trustee. This is currently Barnett Waddingham LLP, who will usually be your contact for queries about the LSF and the payment of your benefits. Contact details for Barnett Waddingham are given below
- our provider of pensions management and scheme secretarial services
- the LSF's professional advisers, including, but not limited to, the Actuary, auditor, medical advisers, investment adviser and lawyers
- 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
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- insurance companies with which we may secure benefits for members or beneficiaries of the LSF
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK and/or a payment via our overseas payment provider when pensions are being paid overseas
- beneficiary or mortality tracing agencies
- the Fund's Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life

expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

7 How long we keep personal data for

- We 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, we must keep certain personal data for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life, and that of your dependant, so that we have the information we need to pay benefits and answer queries about benefits.
- We review the personal data held in relation to the LSF on a regular basis in accordance with our data retention policy (as amended from time to time). If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

8 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 we hold about you is inaccurate, you can ask to have it corrected
- You can require the Trustee to restrict 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
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact" below)
- You can request that your personal data is deleted altogether

You should be aware that taking any of the above steps could impact on the payment of your benefits and our ability to answer questions relating to your benefits. Please note that in certain circumstances the Trustee can take steps to override a member's request to object to processing, to withdraw consent or to delete personal data, in light of the Trustee's fiduciary duties to administer your pension benefits.

In most cases information will be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

9 Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of this notice
- make a complaint about how we have handled your personal data

please contact our administrators at:

- Email: LSFadmin@Barnett-Waddingham.co.uk
- Lloyds Superannuation Fund Pension Administration, Barnett Waddingham LLP, 2 London Wall Place, London EC2Y 5AU
- Tel: 0330 175 7026

10 Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are 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.

LSF Pensions Management Ltd
Trustee of Lloyd's Superannuation Fund
Date: 4 February 2022