



DE LA RUE PENSION SCHEME (THE "SCHEME")

PRIVACY NOTICE – PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR SURVIVORS¹

As the Trustee of the Scheme, 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 in compliance with applicable data protection laws.

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 Scheme's 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 and 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 from your photographic ID (for example, your passport or driving licence number)
- (e) details about your dependants and who you would like us to consider paying benefits to if you die
- (f) your health (for example, to enable us to consider applications for ill health retirement)
- (g) your choice of fund for your defined contribution or additional voluntary contributions investments
- (h) biometric data (for example, using photographic and video images of you to verify your identity)

1.2 What information may we collect from other sources (such as your employer or administrators of your estate)?

These are examples of categories of information we may collect from other sources:

- (a) personal details (for example, your name, date of birth, marital status)
- (b) your contact details (for example, your address, phone number and email address)

¹ Version [5] – adopted by the Trustees on 11 August 2026

- (c) information necessary to calculate and pay your benefits (for example, your state of health, employment history and salary)
- (d) information about your dependants necessary to assess eligibility for benefits on your death.

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 making sure your details are up to date
- (b) communicating with you
- (c) calculating and paying your benefits
- (d) making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death
- (e) working with our advisers to ensure the Scheme is appropriately funded and to manage our commitments to pay benefits
- (f) providing data to our pensions dashboards provider, Civica UK Limited, to allow you to view your pensions information on the dashboard.

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

- (a) to fulfil our legal obligations, such as giving you specified information about your benefits as required by pension legislation or verifying your identity
- (b) to meet our legitimate interests to administer the Scheme efficiently and to pay benefits to you and your survivors in accordance with the Scheme rules
- (c) because we need to use the information to fulfil our obligations as trustees (for example, to pay ill health pensions or benefits after your death) and our use of the information is authorised by law
- (d) because using the information is necessary in relation to a legal claim
- (e) because we need to use the information to fulfil our obligations as trustees in relation to pensions dashboards, including where “Find Requests” are made and matching criteria is required. Because the processing of your data in relation to pensions dashboards is legally required, this means you have no individual right to erasure, data portability or to object in the same way as you do for other processing (see 4 below).
- (f) Where this is necessary for a specific legitimate interest that is recognised in law. These recognised legitimate interests are: public task disclosure requests; national security, public security and defence; detecting, investigating and preventing crime; and/or safeguarding vulnerable individuals.

In a few cases, especially where we need information about your health or we use biometric data to verify your identity, we may ask for your consent to process your data. Where this applies, you may take back your consent at any time by contacting Emma Roberts using the details below.

Where we process special category data about you, such as information about your health or biometric data, UK data protection law requires us to satisfy an additional condition. In most cases we rely on this being necessary for the establishment, exercise or defence of legal claims, or for our obligations in connection with employment, social security or social protection. In more limited circumstances, we may also rely on other recognised conditions, such as where necessary for safeguarding vulnerable individuals, preventing or detecting crime, or responding to public task disclosure requests.

2. INFORMATION SHARING

2.1 We may share personal information with:

- (a) the Scheme's administrators (currently Hymans Robertson LLP) to facilitate the administration of the Scheme and your benefits. Hymans Robertson LLP may appoint third party service suppliers or sub processors to assist with its processing services
- (b) Hymans Robertson LLP, which provides actuarial, investment and analytics advice to the Trustee. When providing actuarial services, the Scheme Actuary and Hymans Robertson act as joint data controllers with the Trustee. For more information about these roles, please visit [Scheme Member Privacy Notice - Hymans Robertson](#)
Your data will also be shared with Club Vita LLP, who provide longevity (life expectancy) analytics and related information to help us manage the Scheme's liabilities
- (c) financial advisers to facilitate their giving advice to members. The Trustee expects such advisers to be data controllers when acting in this capacity
- (d) professional advisers such as our legal advisers and auditors
- (e) our bank and/or tracing services to facilitate payment of benefits
- (f) additional voluntary contribution (AVC) and annuity providers
- (g) power of attorney holders (people with legal authority to act on your behalf in financial matters)
- (h) His Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator, the Pension Protection Fund and the National Fraud Initiative
- (i) 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
Rothesay as insurer of the bulk annuity policy purchased during May 2022, a separate letter has been provided with details of Rothesay's privacy notice which is available at/on <https://www.rothesay.com/data-protection/privacy-notice-for-scheme-members/>
- (j) other parties, such as potential providers during a restructuring of the Scheme
- (k) our chosen pensions dashboard provider, Civica UK Limited
- (l) where you make a "Find Request" in relation to pensions dashboards, other pension scheme trustees and managers for the purpose of responding to the request.

2.2 We may also provide some of your personal information to Scheme employer group companies and their advisers 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 measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

We will keep your personal information for 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.

The Scheme's Independent Trustee (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Scheme. Information about PAN's approach in this situation to data security as a firm can be found at pantrustees.co.uk/Scheme-GDPR.

4. YOUR RIGHTS

You have the following rights regarding your personal information:

- (a) **to be informed** - the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights; this privacy notice is intended to meet that right
- (b) **access** - the right to be provided with a copy of your personal information
- (c) **rectification** - the right to require us to correct any mistakes in your personal information
- (d) **to be forgotten** – the right to require us to delete your personal information, in certain situations
- (e) **restriction of processing** – the right to require us to restrict processing of your personal information in certain circumstances, e.g. if you contest the accuracy of the data
- (f) **data portability** – the right to receive personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party, in certain situations
- (g) **to object** – the right to object: (a) at any time to your personal information being processed for direct marketing (including profiling); and (b) in certain other situations to our continued processing of your personal information (e.g. processing carried out for the purpose of our legitimate interests)
- (h) **to withdraw consent** – where we rely on your consent to process your personal information (for example, in relation to certain health or biometric data), the right to withdraw that consent at any time, as explained above
- (i) **not to be subject to automated individual decision-making** – the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly affects you. Please note that while there is no individual automated decision making within the Scheme, we are aware that some parts of the pensions dashboards programme may be automated
- (j) **to lodge a complaint:** You have the right to lodge a complaint about our handling or processing of your personal data. (See below for further details).

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the guidance from the Information Commissioner's Office on individuals' rights under the UK General Data Protection Regulation at www.ico.org.uk.

If you would like to discuss or exercise these rights, please contact us.

5. INTERNATIONAL DATA TRANSFER

To deliver services to you, it is sometimes necessary for us to transfer, store or process your personal information outside the European Economic Area (EEA) and/or the UK, for example with our service providers located outside the EEA and/or the UK. Such countries do not have the same data protection laws as the EEA and/or the UK. Any transfer of your personal information will be subject to appropriate or suitable relevant safeguards. If you would like further information regarding the mechanisms used to comply with data protection laws when transferring your personal information out of the EEA and/or the UK, or to obtain a copy of the safeguards, 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 posted on the website: <https://www.delaruepensions.co.uk> or notified to members if earlier.

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 Scheme Secretary:

Emma Roberts – Scheme Secretary
 Dalriada Trustees
 46 New Broad
 Street
 London
 EC2M 1JH

e-mail: DeLaRuePensionScheme@dalriadatrustees.co.uk

- 7.2 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.

What if you have a complaint?

- 7.3 We hope that we can resolve any query or concern you raise about our use of your information. If you have concerns about how your personal data is being used, you may raise a complaint with the Trustees via the Trustee Internal Dispute Resolution Procedure. You can obtain a copy of this by writing to the Scheme administrators at Delaruepension@hymans.co.uk. We will acknowledge your complaint within 30 days and respond without undue delay.
- 7.4 If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you also have the right to complain to the Information Commissioner. The Information Commissioner may be contacted at: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; telephone: 0303 123 1113; or online at <https://ico.org.uk/concerns/>.