



Use of your data (Privacy Notice)

This notice is issued by Northern Gas Networks Pensions Trustee Limited (“**we**” or the “**Trustee**”) as Trustee of the Northern Gas Networks Pension Scheme (the “**Scheme**”). In this notice we’ll use the term UK GDPR to mean the UK’s General Data Protection Regulation.

We are issuing this notice to comply with the data protection laws. This notice sets out:

- why we hold personal data
- what data we hold about you
- what we will do with the data
- who we will share your data with
- how long we will hold it
- how we keep it safe
- what your rights are in respect of the data we hold
- who to contact about your personal data

You do not need to take any action - the notice is for your information. You may want to keep it with your pension details.

Why we hold your data

You are a member of the Scheme or you are in receipt of benefits as a dependant of a Scheme member which means we are obliged to hold data about you. Even when all your benefits have been paid out, we are obliged to hold data about you, your benefits and how they were settled. This can also assist us in resolving queries you may have in the future. Most of the data held and processed by the Trustee in running the Scheme 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 purpose and means by which the personal data held is processed. The Trustee’s actuarial advisers, currently Aon, are also data controllers in relation to some of your personal data that the Trustee holds. There is a short note from them at the end of this notice, explaining a bit more about their role as data controller.

What data do we hold about you

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

Data about who you are:

- Name
- Date of Birth
- Address and Contact Details including your phone number and email address
- Sex/Gender
- National Insurance Number

Details when benefits are paid out:

- Bank account information
- Birth/adoption certificate details
- Marriage certificate details
- Change of name details
- Death certificate details
- Health details (only obtained for the purpose of providing ill health benefits)
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.

We hold this data so that we can identify you and ensure we pay the benefits to the right person. We use your gender detail to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. 'Mr, Mrs., Ms....'

Details about your pension entitlement from the Scheme that may consist of:

- Salary information
- Investment records
- Pension amounts
- Information relating to divorce cases, including details of a divorce settlement
- Other information necessary to provide your pension
- If we are paying or have paid you, we may also hold the bank account details related to those payments
- We may hold information that you have given us about your family or dependants and who you would like us to pay in the event of your death (including name, sex and date of birth)
- Details of any contributions paid by you or on your behalf to the Scheme, including additional voluntary contributions (AVCs).
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Scheme.
- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state pension.
- Correspondence that we may have received about you from your appointed independent financial adviser.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

What we will do with your data

The Trustee needs to hold and process information about you because it is needed for the administration of the Scheme and to calculate and pay benefits. This includes: paying benefits as they fall due; managing existing insurance contracts, purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance). In legal terms, the Trustee has a legitimate interest in holding and processing the above information to properly administer the Scheme. This also applies to personal data about dependents and next of kin as is collected by the Trustee in expression of wish forms, nominations forms and dependents' forms from time to time.

The Trustee also keeps the above information to allow it to comply with its obligations towards members under the Scheme's governing documents, as well as under relevant legislation. The Trustees will use your personal information to comply with these legal obligations, to establish and defend their legal rights, and to prevent and detect crimes such as fraud. The Trustees may need to share your personal information with other people for this reason, such as courts and law enforcement agencies. The Trustee will not collect any personal data from you that it does not need.

Personal data relating to the Scheme is held on paper and on computer systems. We may use automated means to calculate the amount of the benefit due to ensure accuracy and consistency of calculations. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Scheme, the Trustee may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special category personal data"). Under the legislation, details relating to health and sexual orientation are regarded as "special category personal data". Except where the legislation allows it, such as for reasons of substantial public interest or law (that's relevant to sexual orientation data about you/your spouse/your partner), this information cannot be processed or passed to a third party without your explicit consent. Health data usually requires this explicit consent. You can withdraw your consent at any time by contacting the Trustees using the contact details given below. This may affect what the Trustees can do for you, unless they have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to the Trustees processing your health data for that, but then you withdraw that consent, the Trustees will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Who will we share your data with

The Trustee is not allowed to share personal data about you with other organisations and people, unless the law allows us to do so or you have given your consent. As the Trustee needs to share information with others in order to provide you with benefits and properly administer the Scheme, there is a legitimate interest in the Trustee sharing this information. The Trustee may also need to share it in order to meet contractual and other legal obligations.

The Trustee shares personal data with the following:

- The Scheme Secretary
- Your current, past or future employer (for example in relation to some exercises which relate to the operation of the Scheme – more details below)
- The Trustee's professional advisers, including the Scheme actuary, investment adviser, medical adviser, lawyers, insurers and auditor. Full details of how the auditor, Grant Thornton, uses personal data can be found in their privacy statement at www.grantthornton.co.uk/privacy
- Scheme administrators
- HMRC and other statutory bodies, such as the Pensions Ombudsman and the Pensions Regulator and the Information Commissioner's Office
- IT and data storage providers
- Tracing and identity verification agencies
- Printing services and tracking and tracing services for member communications, including benefit statements
- Various banking systems to facilitate electronic pension payments, including payments to pensioners who live overseas
- Legal & General Assurance Society in its capacity as an insurer (more details below)
- Independent Financial Advisers ("IFAs") (more details below)

The Trustees would have a legitimate interest in sharing your personal information with service providers (such as IFAs) and / or the Scheme's employers so that they can advise you and contact you/or be ready if you contact them for obtaining financial advice in connection with your benefits under the Scheme and any additional options which may be available to you in relation to those benefits.

The Trustees may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

Sometimes we need to use your special categories of personal data (e.g. information about health; details about personal relationships to determine who should receive benefits on your death) in order to establish, exercise or defend legal claims.

If data is provided to or processed or stored in a country outside the UK or EEA, that transfer will comply with the requirements of the applicable data protection legislation. In particular, appropriate safeguards will be put in place to ensure that your data is kept secure. Transfers outside of the UK can happen lawfully if:

- the personal information is transferred at the request and with the consent of the Scheme member in relation to his/her own benefits (or those of a dependant or beneficiary, as appropriate);
- the country to which the personal information is being transferred is deemed to provide adequate protection for personal data by the UK secretary of state and/or the UK's Information Commissioner who (depending on the circumstances) determine adequacy;
- UK government approved contracts, such as the International Data Transfer Agreement or the International Addendum to European Commission Standard Contractual Clauses, have been put in place with the third party/parties to whom the personal information will be transferred, containing appropriate safeguards in relation to it; or
- the transfer is within a group of companies who have obtained UK approved Binding Corporate Rules (which are rules adhered to by a group of companies to ensure data transfers comply with UK GDPR).

You can find out more about these safeguards (including how to obtain copies) by contacting Link Group, using the contact details at the end of this notice.

The identity of the above providers may change from time to time. Data will only be shared as required in respect of the service provided to us.

When would personal data be shared with the employer in relation to exercises relating to the operation of the Scheme?

The Scheme's employer has a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, we (the Trustee) may share your personal information with the employers so that they can contact you for that purpose. Below we have set out more detail to ensure we are being as transparent as possible, with our responsibilities under data protection laws in mind.

We (the Trustee) are responsible under data protection laws for all your records relevant to the Scheme, including your personal data in those records. The employers cannot run these types of exercises unless we share with them some necessary and relevant personal data about you at the appropriate time. We would only do that sharing where it is permitted by data protection laws. This means we would assess whether the sharing with your employer is justified by what is called 'legitimate interests'. We would assess whether your own interests, rights and freedoms under data protection laws are such that they outweigh the legitimate interest of the employer in wanting to carry out these types of exercises, noting that the employer would in turn share some limited and necessary personal data about you with the employer's advisers and independent financial advisers for that same reason of legitimate interests.

If the employer does run these types of exercises it would have to write to you by letter to explain about the particular exercise at the appropriate time.

When would personal data be shared with insurers including Legal & General Assurance Society?

We (the Trustee) have a legitimate interest in properly administering the Scheme. For this reason we will from time to time share your personal data with insurers. We will share some limited personal data when we are looking at purchasing and pricing up insurance contracts called 'annuities' (unless that can happen based on anonymized data). Insurers will use that data to verify the assets and liabilities of the Scheme. We will share additional personal data when we actually purchase that type of insurance contract from the chosen insurer. The following categories of personal data would typically be shared with insurers: Scheme membership ID number; marital status and details about spouse/partner; date of birth; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

We would assess whether your own interests, rights and freedoms under data protection laws are such that they outweigh our own legitimate interest in purchasing these types of insurance contracts to properly administer the Scheme. This would have to be assessed each time we look at purchasing these types of insurance contracts.

We would notify members to explain about the particular annuity policy and who the insurer is at the appropriate time if we do purchase these types of policies. In this way you can know who holds your personal data and how to exercise your rights against them. Sometimes we will need to write to you before purchasing an annuity to ask for up-to-date information about your spouse/partner/children/other dependants.

The insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it).

To this end, the Trustee secured a "bulk annuity" investment with Legal & General Assurance Society in October 2020 covering pensions in payment. A bulk annuity is an investment of the Scheme in the form of an insurance policy. Under the policy, the insurer will pay the Trustee monthly amounts to cover the pension payments that are covered by the policy.

On a regular basis the Trustee is required to share data concerning members with Legal & General for the purpose of the ongoing administration of the bulk annuity policy. Your personal data will be shared with Legal & General. Without this, Legal & General cannot administer the bulk annuity insurance policy properly. Legal & General is a "Data Controller" as defined by the UK GDPR and is required to adhere to the strict controls set by the data protection legislation.

Legal & General's Privacy Notice can be found here <https://www.legalandgeneral.com/institutional/pension-risk-transfer/privacy-policy/>. It describes how they process and protect members' personal data and how you can exercise your rights under data protection legislation. You can refer to this webpage at any time.

A copy of Legal & General's Privacy Notice is also enclosed with this Privacy Notice from the Trustee.

How long we will hold your data and how we will keep it safe

We may be required to answer questions about your pension for many years as questions can arise at any time even after your death. Therefore, we will keep your data for as long as the Scheme exists. However, we review the personal data we hold on a regular basis. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

We have taken reasonable steps to ensure that your data is kept safe. This includes checking that appropriate physical and technological security processes are in place to protect your data. When the Trustees pass your information to a third party, we ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection. We have also ensured that the process for sharing data is sufficiently secure so that the data is protected in transit.

What are your rights

Data protection legislation means that you have the opportunity to enforce your rights on the data we hold:

- 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 or wrong, you can ask to have it corrected.
- 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 Scheme administrators, Link Group (see "Who to contact" overleaf).
- You can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

These rights apply to all members, including dependents and next of kin. Information in respect of data requests will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances, and Link Group (for the Trustee) will explain these to you where they are relevant.

Who to contact

The Trustee has delegated day to day record keeping to Link Group (formally called HS Pensions). They hold and process your data on behalf of the Trustee. If you wish to see your personal data, exercise any of the rights mentioned above or make a complaint about how we have handled your personal data, please contact Link Group:

Email: NGN@hs-pensions.com

Tel: 0151 448 5572

or

Link Group
25 Goodlass Road
Liverpool
L24 9HJ

The Trustee can be contacted in writing at:

Northern Gas Networks Pensions Trustee Limited
1100 Century Way
Colton
Leeds
LS15 8TU

To ask for a copy of your data, please contact:

Personal Data Enquiries
Link Group
25 Goodlass Road
Liverpool
L24 9HJ

Please quote the Northern Gas Networks Pension Scheme, your National Insurance Number and Date of Birth.

If you are not satisfied with the response to any query you raise with Link Group, 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:

Email: <https://ico.org.uk/global/contact-us/casework@ICO.org.uk>

Tel: 0303 123 1113

or in writing at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Updates to this notice

This notice is the latest version as at March 2024. This notice will be updated from time to time and you can request the current version by contacting Link Group, using the contact details above.

Additional information – Actuarial Advisers (Aon)

Overleaf is a brief description from the Trustee's actuarial advisers, Aon Solutions UK Limited, on how they use your personal data in order to support the Trustee in the running of the Scheme.

Aon Solutions UK Limited “ QUICK READ” PRIVACY NOTICE

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting contact us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH; RI.UK.PrivacyChampions@aon.com