

The RNLI 1983 Contributory Pension Scheme (the 'Scheme')

Full privacy notice

Who we are

As the Trustees of the Scheme, we hold certain personal information (known as "personal data") about members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustees in running the Scheme will be personal data.

For legal purposes, the Trustees are known as the "data controllers", as we decide the purposes for and the means by which the personal data we hold is processed.

What information we 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
- your address
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries
- medical and other details about your health (e.g. if you apply for an ill-health retirement)
- if you have used a pensions dashboard, your unique "pensions identifier".

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.

How we gather your personal information

We gather personal information from a number of sources including the following:

- directly from you
- from your current or former employer
- from persons acting as personal representatives of a deceased person's estate
- from a public body such as HMRC
- from public databases such as the Register of Births, Deaths and Marriages
- from other pension schemes, where transfers into the Scheme have been made
- from an independent financial adviser, solicitor or other person instructed by a person to provide us with information
- from our advisers
- from third parties used to trace members or beneficiaries with whom we have lost contact
- 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.

How we use that information

The Trustees have a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also process and retain personal data:

- to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation; and
- to comply with our duties in relation to pensions dashboards. This includes "matching", where we use personal data that a user has provided to search our Scheme records, and where we collect further personal data in the event of a possible match.

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

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “special categories of personal data”). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “special categories of personal data”. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

We may transfer, store, or process your personal data outside of the UK or EEA (as applicable). Where this is the case, we will take reasonable steps to ensure that your personal data continues to be appropriately secured.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes or
- where you have given your consent.

However, as the Trustees need help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current, past or future employer
- the Trustees’ professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustees
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustees can be fined and subject to other action if they fail to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement
- third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, as well as the Scheme’s Integrated Service Provider (ISP), which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem.
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- 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) in the UK and/or a payment via SEPA (Single Euro Payments Area) for payments in Europe and/or via secure online banking international payment system for pension payments outside of Europe. A secure online banking system is used for one-off payments.
- outsourced payroll providers (Republic of Ireland, Isle of Man and Channel Islands)
- Department for Work and Pensions (DWP), mortality tracing agencies, beneficiaries etc.

The Scheme’s actuary, auditor and (in certain circumstances) legal advisers are also data controllers in relation to your personal data. This means that they have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. For more information about what personal data they hold about you and how they use it, please follow the links:

- the Scheme’s actuary, Willis Towers Watson - you can see this at www.willistowerswatson.com/personal-data
- our legal advisers, Sacker & Partners LLP – their privacy notice for pension scheme members, beneficiaries and client employees is available at <https://www.sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees/>

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. Where there is a

maximum limit on how long we can keep certain personal data for, we will comply with that restriction. But, given the nature of pension schemes, the Trustees may be required to keep some of your personal data for the rest of your life.

Your rights

Right of Access – 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.

Right to Rectification – if at any point you believe that the personal data we hold about you is inaccurate/wrong, you can ask to have it corrected.

Right to Restrict processing – you can require the Trustees to restrict the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.

Right to object to processing – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustees can override this objection in certain circumstances.

Withdrawing consent – 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 about your personal data” 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 Trustees to continue processing your personal data where this is justified.

Right to be forgotten – you can request that your personal data is deleted altogether, although the Trustees 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, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

Generally speaking, the Trustees will provide you with a copy of your personal data free of charge. In certain, limited circumstances the Trustees may charge a small fee to cover the administration costs involved in providing you with a copy of your personal data.

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 the notice
- make a complaint about how we have handled your personal data please contact the Scheme's administrator:

Email: rnli1983pensions@wtwco.com

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**.

Updates to this notice

This notice is the latest version as at 16 July 2025. This notice will be updated from time to time and you can see the current version at any time on the Scheme website at <http://www.rnlipensions.org.uk/documents/privacy-notice.pdf> Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact about your personal data" above).