

FULL PRIVACY NOTICE for the members and beneficiaries of the London Pensions Fund Authority

This notice is for members and beneficiaries of the London Pensions Fund Authority (the **"Fund"**). It has been prepared by the Local Pensions Partnership (LPP) on behalf of the London Pensions Fund Authority (the **"Administering Authority"**) in its capacity as the pension provider to the administering authority of the Fund.

LPP are considered joint controllers with the Administering Authority and as such LPP are responsible for the day to day administration of the Fund. The Administering Authority retain full discretion when it comes to the Fund, paying benefits, dispute resolution and the Fund investment rationale.

This privacy notice is also provided at the following link:

<https://www.yourpension.org.uk/LPFA/Accessibility/Privacy-and-Cookies-Policy.aspx>

Why we are providing this notice to you

As the pension provider to the Administering Authority of the Fund we hold certain information about you (**"personal data"**) which we use to administer the Fund and to pay benefits from it. This notice is designed to give you information about the data LPP and the Administering Authority hold about you, how we use it and your rights in relation to it.

The technical bit

LPP and the Administering Authority holds personal data about you in its capacity as joint data controllers for the proper administration of the Fund. This includes the need to process your data to contact you, to calculate and pay your benefits, for statistical and financial modelling and for reference purposes (for example, when we assess how much money is needed to provide members' benefits) and to administer the Fund generally. Further information about how we use your personal data is provided below.

The legal basis for our use of your personal data will generally be one or more of the following:

- a. we need to process your personal data to satisfy our legal obligations as the pension provider to the Administering Authority of the Fund; and/or
- b. we need to process your personal data to carry out a task in the public interest or in the exercise of official authority in our capacity as a pension provider to a public body; and/or
- c. we need to process your personal data for the legitimate interests of administering the Fund and calculating and paying benefits from the Fund and to perform our obligations and exercise any rights and discretions the Administering Authority has in relation to the Fund; and/or
- d. because we need to process your personal data to meet our contractual obligations to you in relation to the Fund as a pension provider (for example, under an agreement that you will pay additional voluntary contributions to the Fund), or to take steps, at your request, before entering into a contract.

What personal data we hold, and how we obtain it

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth, national insurance number and employee and membership numbers.
- Information that is used to calculate and assess eligibility for benefits, for example, length of service and salary information.
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax details.
- Information about your family, dependents or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death.
- Information about your health.

We obtain some of this personal data directly from you and the Administering Authority. We may also obtain data from your employer (for example, salary information) (where you are a beneficiary of the Fund this will be obtained as a consequence of the member's membership of the Fund) and from a variety of other sources including public databases (such as the Register of Births, Deaths and Marriages), our advisers and government or regulatory bodies, including those in the list of organisations that we may share your personal data with set out below.

How we will use your personal data

We will use this data to administer the Fund on behalf of the Administering Authority including the processing of your personal data for all or any of the following purposes:

- to contact you.
- to assess eligibility for, calculate and provide you (and, if you are a member of the Fund, your beneficiaries upon your death) with benefits.
- for statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members' benefits).
- to comply with our legal and regulatory obligations on behalf of the Administering Authority of the Fund.
- to address queries from members and other beneficiaries and to pass any actual or potential disputes concerning the Fund to the Administering Authority for response.

Organisations that we may share your personal data with

From time to time we will share your personal data with advisers and service providers so that they can help us and the Administering Authority carry out our duties, rights and discretions in relation to the Fund. Some of those organisations will simply process your personal data on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal data that we share with them. They are referred to as data controllers and we have highlighted them in the table below. You will be able to find out about their own data protection policies (which will apply to their use of your data) on their websites.

The organisations LPP share the Fund's data:

Data processors	Data controllers/ joint controllers
<ul style="list-style-type: none">• Printing companies - (currently BKT and FCS Laser)• Pensions software provider - (currently Aquila Heywood)• Suppliers of IT, document production and distribution services• Tracing bureaus for mortality screening and locating members - (currently ATMOS)• Overseas payments provider to transmit payments to scheme member with non-UK accounts - (currently Western Union)	<ul style="list-style-type: none">• London Pension Fund Authority• Fund Employers• Actuary - (currently Barnet Waddingham)• External auditor - (currently Grant Thornton)• Internal auditor - (currently Deloitte)• The Department for Work and Pensions• The Government Actuary's Department• The Cabinet Office - for the purposes of the National Fraud Initiative• HMRC• The Courts of England and Wales - for the purpose of processing pension sharing orders on divorce

In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

In addition, where the Administrating Authority make Fund investments or seek to provide benefits for Fund members in other ways, such as through the use of insurance, then we may need to share personal data with providers of investments, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

From time to time we may provide some of your data to your employer and their relevant subsidiaries (and potential purchasers of their businesses) and advisers for the purposes of enabling your employer to understand its liabilities to the Fund. Your employer would generally be a controller of the personal data shared with it in those circumstances. For example, where your employment is engaged in providing services subject to an outsourcing arrangement, LPP or the Administering Authority may provide information about your pension benefits to your employer and to potential bidders for that contract when it ends or is renewed.

Where requested or if we consider that it is reasonably required, we may also provide your data to government and law enforcement organisations, including those listed above, the Pensions Regulator and Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their legal functions.

The organisations referred to in the paragraphs above may use the data to perform their functions in relation to the Fund as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates), business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

In some cases these recipients may be outside the UK. This means your personal data may be sent outside the EEA to a jurisdiction that may not offer an equivalent level of protection as is required by EEA countries. If this occurs, the Administering Authority are

obliged to verify that appropriate safeguards are implemented with a view to protecting your data in accordance with applicable laws. Please use the contact details below if you want more information about the safeguards that are currently in place.

We do not use your personal data for marketing purposes and will not share this data with anyone for the purpose of marketing to you or any beneficiary.

How long we keep your personal data

We may retain your personal data for up to 99 years after benefits have stopped being paid or as long as we need it to administer the Fund on behalf of the Administering Authority and to deal with any questions or complaints that we may receive about this, unless the law requires us to keep it for a longer period. In practice, this means that your personal data may be retained for as long as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Fund and after those benefits stop being paid.

Your rights

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask us to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

If you wish to exercise any of these rights, please contact the Fund Administrator or Administering Authority below. You also have the right to lodge a complaint in relation to this summary notice, the full Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the benefits payable to you under the Fund. In some cases it could mean that we are unable to put your pension into payment or have to stop your pension (if already in payment).

Updates

We may update this notice periodically. Where we do this we will inform members of the changes and the date on which the changes take effect.

Contacting us

Please contact the Administrator LPP or the Administering Authority for further information.

Please contact the Fund Administrator - Local Pensions Partnership (LPP) at DPA@localpensionspartnership.org.uk

Please contact the Administering Authority - London Pensions Fund Authority at DPA@localpensionspartnership.org.uk

Data Protection Officer

You may also contact LPP's data protection officer Greg Smith for further information at DPA@localpensionspartnership.org.uk