



## PRIVACY NOTICE

### ***Personal information about our members and their survivors***

As Trustees of the ITV Pension Scheme (the Scheme), we need to collect and use personal information (known as personal data) about our members and, where applicable, their dependants and beneficiaries. Personal data is information, or a combination of pieces of information, that could reasonably allow you to be identified. This privacy notice sets out how we collect, use and protect your personal data and your rights about your data. It's issued according to the requirements of the General Data Protection Regulation, which governs the processing of personal data from May 2018.

#### ***What data 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 gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants, beneficiaries and, in some circumstances, ex-spouses (including their names and possibly details of their gender)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits
- medical and other details about your health.

As part of running the Scheme, we may need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. The legislation classifies details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations as sensitive personal data. Except where the law allows it, this information can't be processed or passed to a third party without your explicit consent.

We may also need to hold other information about you from time to time to enable us to administer the Scheme and calculate and pay benefits properly.

#### ***How we hold your data***

Your personal data is held on paper and on computer systems.

#### ***How we use your data***

- The Trustees have a legitimate interest to hold and process the above data about you to administer the Scheme and to calculate and pay benefits properly.
- The Trustees also need to process the data to meet our obligations towards members under the Scheme's governing documents, as well as under relevant legislation.

Your personal data will generally be collected directly from you or from your employer.

The Trustees are the 'data controller' as we decide why and how the personal data we hold is processed. As the data controller, we must process this information fairly and lawfully.

#### ***Who we share your personal data with***

The Trustees are assisted by various advisers and organisations to administer the Scheme and, as a result, we share personal data with the following data processors:

- your current, past or future employer
- the Pensions Executive, who are responsible for oversight of the Scheme and strategy and are employed by ITV Services Limited
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustees, which includes ITV Pensions who are also employed by ITV Services Limited
- the Scheme's professional advisers, including the Scheme 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 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
- our appointed insurance company or companies for the purposes of securing certain members' benefits, life insurance and additional contributions.

Depending on how we pay pensions, we may also need to share personal data to make payments via BACS transfer (the Bankers' Automated Clearing Service) in the UK and/or to make payments using Citibank (our banking providers) when pensions are being paid overseas. We may also need to share personal data with agencies who help us with member tracing and identity verification.

To meet legal and regulatory requirements for occupational pension schemes, at times, your personal data may also be processed by other data controllers or joint data controllers. This will typically be the case when:

- your current, past or future employer needs to process information about the Scheme for its own purposes, for example when valuing the Scheme's assets and liabilities and considering how much it can contribute to the Scheme on an ongoing basis,
- the Scheme's actuarial adviser (currently Mercer Limited) provides actuarial services to the Trustees, for example when performing its own assessments of the Scheme's assets and liabilities, and
- the Scheme's auditor (currently Grant Thornton UK LLP) when carrying out its audit for the report and accounts.

When processing your personal data, these organisations are legally required to comply with data protection laws. However, ITV Pensions will remain your primary point of contact for any data protection related matters (see the 'Who to contact about your personal data' section below).

In limited circumstances, your personal data may be processed outside of the European Economic Area; any such transfers will be made in compliance with data protection legislation. For further information please contact us.

### Data transfer outside the EEA

Certain of the organisations providing services to the Trustees currently have IT support functions based outside the European Economic Area (the EEA). We are working with these organisations to ensure that any processing of personal data complies with the requirements of data protection legislation. You can contact ITV Pensions for more information about the protections used to ensure that your personal data is adequately protected when processed outside the EEA (including how to obtain copies of the protections in place).

### How long we keep personal data for

We must keep all personal data safe and hold it only for as long as necessary. For legal and tax reasons, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for at least 6 years. However, given the nature of pension schemes, the Trustees will need to keep some of your personal data longer than this and, in some circumstances, for the lifetime of the Scheme plus 6 years.

We review the personal data we hold regularly according to our data retention schedule. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed or anonymised.

### Your rights

By law, you have certain rights in relation to your personal data:

- **Right of Access** – to see personal data that's held about you and to have a copy provided to you, or someone else on your behalf, in a digital format.
- **Right to Rectification** – to ask for any information about you to be corrected if you believe that it's incorrect.
- **Right to Restrict processing** – to require the Trustees to limit 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** – to object to your personal data being processed, although the Trustees can override this objection in certain circumstances.
- **Withdrawing consent** – where you have been required to give your consent to us processing your personal data, to withdraw your consent to us doing so in the future, although the Trustees may be able to continue processing your personal data where this is justified.
- **Right to be forgotten** – to request that your personal data is deleted altogether, although the Trustees can override this request in certain circumstances.

Taking any of the steps set out above could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions about your benefits.

Any information you request will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

### Who to contact about your personal data

If you'd like to see a copy your personal data, discuss or exercise any of the rights mentioned above, or request a hard copy of this Privacy Notice, please call ITV Pensions on 01772 884488 or email [enquiries@itv-pensions.com](mailto:enquiries@itv-pensions.com).

### If you have a complaint

If you'd like to make a complaint about how we've handled your personal data, please contact us.

If you're not satisfied with our response to any query you raise with us, or you believe we're 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. You can find out more by visiting [www.ico.org.uk](http://www.ico.org.uk).

### Updates to this notice

This notice will be updated from time to time and a revision date will be shown. You'll be able to see the current version at any time on the ITV Pensions website at [www.itv-pensions.com](http://www.itv-pensions.com) > Library. Alternatively, if you'd prefer to receive a hard copy of this Notice, please call ITV Pensions on 01772 884488 or email [enquiries@itv-pensions.com](mailto:enquiries@itv-pensions.com).