

# *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 applicable data protection legislation.

### **What personal 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/civil partnership 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
- if you have used a pensions dashboard, your "pensions identifier", used to identify your specific benefits in the Scheme.

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 classes 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 personal data**

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

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

- We have a legitimate interest to hold and process the above data about you to administer the Scheme and to calculate and pay benefits properly.
- We also need to process the data to meet our obligations towards members and beneficiaries under the Scheme's governing documents, as well as under relevant legislation and to the extent required 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 to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a "possible match".

Your personal data will generally be collected directly from you or from your current or former employer or the trustees of other pension schemes within the ITV group. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a survivor's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by a member or through enquiries undertaken by us on a member's death.

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

We may also process your personal data to carry out online bank account verification checks (such verification checks are only 'soft credit checks' and will not affect your credit rating).

## Who we share your personal data with

We are assisted by various advisers and organisations to administer the Scheme and, as a result, we share personal data with various third parties, including the following:

- 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 we fail to provide certain information to these authorities
- the advisers and printers who help us prepare the 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
- 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, which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem
- with the following parties (acting as data controllers) in order to facilitate insurance arrangements in our favour and reinsurance arrangements for the purposes of liability and risk management:
  - (i) ITV PS Number 1 IC Limited and its umbrella company, ITV PS ICC Limited, (the relevant privacy notice being available on request from Willis Towers Watson Management (Guernsey) Limited, PO Box 384, Suite 1 North, 1st Floor, Albert House, South Esplanade, St Peter Port, Guernsey GY1 1AJ);
  - (ii) ITV PS Number 2 IC Limited and its umbrella company, ITV PS ICC Limited, (the relevant privacy notice being available on request from Willis Towers Watson Management (Guernsey) Limited, PO Box 384, Suite 1 North, 1st Floor, Albert House, South Esplanade, St Peter Port, Guernsey GY1 1AJ);
  - (iii) reinsurer Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München (acting through its UK branch, Munich Re Company United Kingdom Life Branch) (please see their privacy notice <https://www.munichre.com/content/dam/munichre/contentlounge/website-pieces/documents/MRUKLB-Information-Notice.pdf>, which we recommend you review from time to time for any updates); and

- (iv) reinsurer Pac Life Re International Limited (acting through its UK branch) (please see their privacy notice <https://www.pacificlifere.com/home/privacy-policies/policyholder-privacy-policy-uk.html>, which we recommend you review from time to time for any updates).

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 third parties who help us with member tracing, existence checking, identity verification and online bank account verification checks.

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,
- the Scheme's actuary (currently Tina Kripps of Willis Towers Watson) and the firm which provides actuarial services to us (currently Willis Towers Watson) provide their services, for example when performing their own assessment of the Scheme's assets and liabilities (further information can be found here: <https://www.wtwco.com/en-gb/notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees>)
- the Scheme's auditor (currently Grant Thornton UK LLP) when carrying out its audit for our report and accounts (further information can be found here: [www.grantthornton.co.uk/en/privacy](http://www.grantthornton.co.uk/en/privacy))
- Equifax Limited, who are a credit reference agency and provide online bank account verification service to assist us in verifying bank account details (further information can be found here: <https://www.equifax.co.uk/privacy-hub/crain>)
- the Scheme's legal adviser (currently Sacker and Partners LLP) when providing legal advice to us on a particular issue (further information can be found here: <https://www.sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees/>)
- the parties listed above in order to facilitate insurance arrangements in our favour and reinsurance arrangements for the purposes of liability and risk management.

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).

## Data transfer outside of the UK

Certain of the organisations providing services to us currently process personal data outside of the UK. Any transfer of Scheme personal data outside of the UK will comply with the requirements of data protection legislation. In particular, such transfers will generally be made based on an adequacy decision or the International Data Transfer Agreement, both as made by the Information Commissioner's Office. You can find details of adequacy decisions and a copy of the International Data Transfer Agreement, at the following links:

- <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide/#Q1>
- <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-data-transfer-agreement-and-guidance/>

## 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. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction.

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 us 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 we 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 we 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 we 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 we can charge a reasonable fee in certain circumstances.

## Who to contact about your personal data

If you'd like to see a copy of 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 information 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/library-items/](http://www.itv-pensions.com/library-items/). 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).