

Trustees of the Tun Abdul Razak Research Centre Pension and Assurance Scheme

Privacy Notice

Purpose of this notice

This privacy notice aims to give you information on how the personal data regarding your membership of the Tun Abdul Razak Research Centre Pension and Assurance Scheme (the “**Scheme**”) is collected and processed.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

We may update this privacy notice from time to time. We will notify you of any substantial changes to how we use your information and provide you with an updated notice when necessary.

Data Controller

We, the Trustees of the Scheme, will be the “data controller” of the personal information collected and used by the Scheme. This means we are responsible for deciding what personal data about you is required and how it should be protected.

In addition, we work closely with the Scheme Administrator First Actuarial LLP, the Scheme Actuary (Neal Thompson, First Actuarial) and our Actuarial Advisers (First Actuarial). In providing services to the Scheme, the Scheme Actuary (Neal Thompson) acts as a joint data controller with us and is therefore covered by this Privacy Notice. The Scheme Administrator (First Actuarial LLP) and our advisers process personal data on our behalf and act as data processors.

What personal data do we hold and use?

We hold personal data on you to enable us to calculate and pay benefits to you or your dependants. The information will also be used, where necessary, for the financial management of the Scheme.

The information we hold on you includes:

- details of your employment history, including salary information
- personal information including name, maiden name, date of birth, National Insurance number and contact details
- records of any benefits you have transferred into the Scheme from other pension arrangements
- records of any additional contributions you or the employer, on your behalf, have paid into the Scheme
- information on benefits you will receive from the Scheme
- your bank account details (but only from the time we need to start paying benefits to you)

Why do we hold this information?

We hold this information because we have a legitimate interest in ensuring that you and/or your dependants get the benefits you are entitled to receive, to ensure that the Scheme is well run and has sufficient funds to pay the benefits promised.

The Scheme Actuary and First Actuarial also hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing actuarial advice and valuations for us. For example, the Scheme Actuary carries out calculations to advise us if the Scheme has enough money to pay the future benefits promised to its members.

We may also use it to comply with our legal obligations, for example in calculating whether the Scheme has enough money to pay future benefits.

We may also hold and use more sensitive data (also known as “special categories of data”) such as health information collected when considering whether to pay any ill-health benefits.

We may need this sensitive data if it is necessary for us to pay ill-health benefits to you, or death benefits to the people you have nominated. If we use this data it will be because you consent, at the time, to us holding and using this information or because we are otherwise entitled to under applicable data protection law. You may withdraw that consent at any time, in which case we will erase that sensitive data. However, if we consider that doing this will prevent us from paying the correct benefits to you or your dependants, we will let you know before proceeding.

If you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it.

Where did we get information about you?

The personal data we hold about you was given to us by:

- **The employer**, who provided us with data such as your salary information, part-time working details, and information on when you joined and left employment.
- **You**, for example, through the forms which you completed when you joined the Scheme. You (or your family members) may also have provided information subsequently when you contacted the Scheme to discuss your benefits, to tell us about a change of address or for other reasons.
- **Previous pension schemes**, where you transferred your benefits into the Scheme. This will include information such as your dates of service, contracted-out benefits (if applicable) and contributions.
- **HM Revenue & Customs**, for tax codes and any information about guaranteed minimum pension entitlements.
- **Tracing agencies**, where it was necessary to use an agency to contact you.
- **Medical professionals**, with your consent, when assessing ill-health benefit applications.

Who do we share information with?

To run the Scheme, your personal information will be used by the Scheme Administrator and our advisers, as necessary (including the Scheme Actuary, actuarial advisers, auditor and legal advisers). We may also need to share your personal information with other parties such as annuity providers, firms providing death-in-service insurance services for the Scheme and tracing agencies (for example, if you move to a new house and don't tell us your new address). Where we do share information with these parties we remain in control of the data and we will ensure that suitable data protection agreements are in place.

We may transfer your data to separate third parties. These parties are:

- official organisations who we have a legal obligation to provide information to. This includes HMRC and the Pensions Regulator
- insurance companies, for example, if we buy an annuity on your behalf
- other pension schemes, if you ask us to transfer your benefits to a new scheme
- the employer, or their advisers, to enable them to manage their financial commitment to the Scheme.

We only share information about you where it is necessary for the running of the Scheme. We do not share information about you for any other reason.

Where we share information with administrators and advisers, we remain in control of your data and ensure appropriate data protection agreements are in place.

International Transfers

We won't transfer your personal data outside the United Kingdom unless in the following circumstances:

- You are an overseas member
- You transfer benefits to a Qualifying Recognised Overseas Pension Scheme (QROPS)"

Where we transfer data internationally, we ensure appropriate safeguards are in place, such as:

- Standard contractual clauses approved for use in the UK
- International Data Transfer Agreements
- Your explicit consent (for transfers you have requested)

If you would like more information about international transfers, please contact us using the details at the end of this notice.

How long do we keep your data?

We will keep information about you for the lifetime of the Scheme to comply with our legal obligations, resolve disputes and enforce our rights. Should we change the administrators or advisers who help us to run the Scheme, we will ensure the previous providers pass your personal data onto the new ones and erase any other copies of your personal information after a suitable period.

The Scheme Actuary and the actuarial advisers also keep a copy of the information. Should we change our Scheme Actuary or actuarial advisers, the existing provider will keep a copy of the data for a minimum of one year and a maximum of seven years.

Your Rights Under UK General Data Protection Regulation (UK GDPR)

Under the UK GDPR, you have the rights to:

Access Your Information

You can request a copy of the personal information we hold about you at any time. This is called a Subject Access Request. We will respond within one month.

Correct Inaccurate Information

If we hold incorrect information about you, you can ask us to correct it. Please contact us as soon as possible if any of your details change.

Request Deletion

In some circumstances, you can ask us to delete your information. However, we may need to retain it to meet legal and regulatory requirements for pension schemes.

Restrict How We Use Your Information

You can ask us to restrict how we use your data in certain circumstances, such as while we investigate a complaint about data accuracy.

Object to Processing

You can object to how we use your information. However, we may not be able to stop processing your data if it is necessary to:

- Administer the Scheme and pay your benefits
- Comply with legal obligations
- Meet regulatory requirements

In these cases, we will explain why we need to continue processing your data.

Data Portability

You have a limited right to receive your data in a structured, commonly used format.

Right to Complain

You have the right to contact us if you have any concerns with how we use your personal data. We will acknowledge your complaint within 30 working days and will do our best to resolve your concerns. You do not have to make your complaint in a specific way but, for quicker resolution, we encourage you to send in your complaints to peterborough.admin@firstactuarial.co.uk

You also have a right to complain to the Information Commissioner's Office (ICO) if you believe that our use of your personal data is in breach of data protection laws and/or regulations. More information can be found on the ICO's website: <https://ico.org.uk/>. Exercising this right will not affect any other legal rights or remedies you have.

Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Scheme so that we can continue to pay you benefits when due, and contact you about your membership of the Scheme. In particular, please let us know if you move home, so that we can stay in touch with you.

Contacting us

You may contact us for further details on how we use your personal information, or with any other questions about this privacy notice, including any requests to exercise your rights, via the Scheme Administrator whose contact details are:

Address: The Trustees of the Tun Abdul Razak Research Centre Pension and Assurance Scheme
c/o First Actuarial LLP
2nd Floor Office, Orton Pavilion
Peterborough Business Park,
Lynch Wood,
Peterborough,
PE2 6FY

Telephone no: 01733 447600

Email address: Peterborough.admin@firstactuarial.co.uk

June 2026