

1 July 2024

Privacy Policy

The Research Machines PLC 1988 Pension Scheme

PRIVACY POLICY

1. INTRODUCTION

1.1 In this Policy:

1.1.1 references to **we, us, Trustee** or **our** means Vidett Trust Corporation Limited, a limited company registered in England (company number: 10842337), whose registered office is at 3rd Floor Forbury Works, 37-43 Blagrove Street, Reading RG1 1PZ; and

1.1.2 references to **you** or **your** means any individual whose personal information we hold.

2. PRIVACY POLICY

2.1 This Policy sets out the basis on which we collect and use personal information about you in our capacity as Trustee of the Research Machines PLC 1988 Pension Scheme (the **Scheme**).

2.2 This Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we disclose it to and your rights and choices in relation to your personal information.

2.3 In this Policy where we use the words **personal information** we use these words to describe information that is about you and which identifies you.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

3.1 We are the data controller for the purpose of data protection law, in respect of your personal information collected and used in connection with the Scheme. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

3.2 The Scheme actuary is considered a "joint data controller" for the purposes of the General Data Protection Regulation, as incorporated into UK Law (**UK GDPR**). The Scheme actuary can be contacted as follows: Ruth Thomas; Barnett Waddingham LLP, 3 Devon Way, Longbridge, Birmingham B31 2TS; 0333 11 11 222; RMPTL@Barnett-Waddingham.co.uk.

4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

4.1 We collect and use personal information about you in the course of acting as Trustee of the Scheme. The personal information we collect includes:

4.1.1 Information that you provide to us

The information that you provide to us may include the following:

- (a) contact information – your name, address, email and telephone number;
- (b) general information – your gender, marital and family status, date and place of birth;
- (c) your social security or national insurance number, passport number, tax identification number, driver's licence number, entitlement to reside in the UK or other government issued identification number;
- (d) information provided voluntarily to us (for example, preferences expressed regarding medical treatment based on religious beliefs);
- (e) details of your employer and employment history (including contribution history and salary data);

- (f) your bank account number, or other financial account number and account details; and
- (g) information provided by you in the course of communication with us, including by emails, letters and telephone calls.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise); and
- (b) when you fill in forms for us (including expression of wish forms).

4.1.2 Information we receive from other sources

This information may include the following:

- (a) information from RM Education Limited or other group companies, each in its capacity as your employer or former employer (as appropriate);
- (b) information from the administrator of the Scheme;
- (c) information from another pension provider (if you have transferred in any other pension benefits);
- (d) information about criminal records or civil litigation history (for example, for preventing, detecting and investigating fraud); and
- (e) following the death of a member, information about that member or his potential beneficiaries for the purposes of receiving death benefits (which may come from other potential beneficiaries or from relatives, solicitors, executors, schools, etc.).

5. SPECIAL CATEGORIES OF PERSONAL INFORMATION

- 5.1 We may also collect certain sensitive personal information about you.
- 5.2 You will provide us with information about your sexual life and orientation, in connection with establishing what benefits may be payable under the Scheme on your death or following a divorce or dissolution of your civil partnership.
- 5.3 There is the ability to retire under the Scheme, in certain circumstances, on ill health grounds. You may provide us with information about your current or previous physical, mental or medical condition, health status, injury or disability information, medical diagnosis, medical procedures performed and treatment given personal habits (for example, smoking or consumption of alcohol), prescription information, and medical history of you and your family. We may also obtain this information from medical practitioners.

6. INFORMATION ABOUT THIRD PARTIES

- 6.1 In the course of your membership of, or other involvement with, the Scheme, you may provide us with personal information relating to third parties.
- 6.2 Such information will include the personal information we collect in respect of individuals who could receive benefits on your death or following your divorce or dissolution of your civil partnership, including:
 - 6.2.1 their name, address and date of birth;
 - 6.2.2 their marital and family status;

- 6.2.3 their national insurance number;
- 6.2.4 information about their sexual orientation;
- 6.2.5 information about their medical history and current medical condition; and
- 6.2.6 their bank details.

You may also provide us with contact details for other third parties such as other pension providers or financial advisers.

- 6.3 We will use this personal information in accordance with this Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party to share such personal information with us and that you have made the information in this Policy available to the third party.

7. FOR WHAT PURPOSE DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

- 7.1 We use your personal data to comply with our legal obligations as the Trustee of the Scheme and to further our legitimate interests. We also have your consent to hold certain information such as your bank account details (to allow you to receive your benefits) and your expression of wish form (to assist the Trustee in exercising its discretion in making discretionary payments). Your personal data may also be used to further the legitimate interests of third parties who are involved in the operation of the Scheme, such as (but not limited to) the Scheme administrator, the Scheme actuary, the Trustee's legal advisers and the RM Education Limited in its capacity as your employer or former employer.
- 7.2 Where we rely on our legitimate interests or the legitimate interests of third parties to justify the purposes that we process your personal information for, those legitimate business interests will typically be one or more of the following:
 - 7.2.1 complying with applicable legal and regulatory obligations and any codes of practice;
 - 7.2.2 conducting a valuation of the Scheme to ensure that there are sufficient funds to meet the liabilities of the Scheme;
 - 7.2.3 ensuring that the Scheme is administered in accordance with the Trust Deed and Rules;
 - 7.2.4 fulfilling our disclosure requirements, including issuing summary funding statements;
 - 7.2.5 notifying you of any changes to your pension benefits;
 - 7.2.6 contacting you and providing information about any retirement options or transfer offers the Trustee and or the employer make available;
 - 7.2.7 processing transfer requests or quotations requested as part of a divorce;
 - 7.2.8 obtaining relevant background information when exercising any discretion under the Scheme Rules; and
 - 7.2.9 complying with our obligations to notify HMRC and the Pensions Regulator of certain events.

Personal Information we may hold	How we use that information
Contact information – your name, address, email and telephone number	To communicate with you To assess and process transfer requests To notify you about changes to the Scheme and any retirement options or transfer offers.
General information – your gender, marital and family status, date and place of birth; details of your employer and employment history (including contribution history and salary data)	To manage and administer the Scheme To prepare Scheme valuations and ensure sufficient funding In connection with any potential or actual arrangement by which the Scheme secures an income stream from an insurance company to supplement the financial support provided by RM Education Limited (and other group companies) to the Scheme or by which your particular benefits are secured with a recognised insurance company To enable us to decide who should receive benefits on your death
Your social security or national insurance number, passport number, tax identification number, driver's licence number, entitlement to reside in the UK or other government issued identification number	To identify you to ensure that you receive the correct amount of benefit
Information provided voluntarily to us (for example, on death benefit forms)	To enable us to decide who should receive benefits on your death
Your bank account number and details	To pay your benefit entitlement

7.3 Where we use sensitive personal information (such as medical records when considering ill health applications) our legal basis for doing so will either be:

7.3.1 explicit consent; or

7.3.2 because the processing is necessary for the purpose of making a determination in connection with eligibility for, or benefits payable under, the Scheme and the potential beneficiary to whom the data relates is not the member.

7.4 We may be required to obtain your personal information to comply with our legal requirements or to enable us to fulfil our duties as Trustee of the Scheme. If you do not provide the relevant personal information to us, we may not be able to meet these requirements and our ability to process your benefits under the Scheme may be impacted.

8. TO WHOM MAY WE DISCLOSE YOUR PERSONAL INFORMATION?

8.1 We will share your personal information with:

8.1.1 the Scheme administrators;

8.1.2 the Scheme actuary;

8.1.3 the Scheme secretary;

8.1.4 the employer and other group companies participating in the Scheme and their advisers;

8.1.5 (where required) our professional advisers, including accountants, lawyers, investment consultants and other professional advisers that assist us in carrying out our activities as Trustee of the Scheme;

- 8.1.6 government authorities and agencies (such as HMRC, the Pension Protection Fund and the Pensions Regulator); and
 - 8.1.7 other third parties such as other pension providers, insurers, intermediaries, Independent Financial Advisers, medical advisers and agents.
- 8.2 We will also disclose your personal information to other third parties, for example:
- 8.2.1 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to fulfil our duties as Trustee of the Scheme; and
 - 8.2.2 in connection with any potential or actual arrangement by which the Scheme secures an income stream from an insurance company to supplement the financial support provided by RM Education Limited (and other group companies) to the Scheme or by which your particular benefits are secured with a recognised insurance company.

9. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

- 9.1 Wherever possible, we would seek to ensure that personal information is not transferred out of the UK. However, the manner in which the Scheme administrators and other advisers provide services to the Scheme may involve the transfer of your personal information to third parties outside the UK. We will implement appropriate and suitable safeguards to ensure that, in the event of any transfers of personal information outside of the UK, such data will be protected as required by applicable data protection law. Where the Scheme's administrators or advisers, or RM Education Limited, transfer data outside the UK, this will be governed by binding corporate rules or standard contractual clauses as appropriate.
- 9.2 If you choose to send us information via the internet there is a risk because it is not completely secure. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

10. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION

- 10.1 We will keep personal information relating to you, your spouse, civil partner or other potential beneficiaries in relation to your pension benefits for the duration of your membership (including as a pensioner member) and for a period of 12 years after the final benefit is made in relation to your membership.
- 10.2 If you transfer your benefits out of the Scheme, we will keep a record of the transfer for a period of 75 years after the transfer so as to be able to demonstrate that a transfer was made and in order to address potential queries relating to the value of your benefits.
- 10.3 We will keep any sensitive personal information only for so long as we have a legitimate reason to hold that information. For example if we obtain medical information in connection with the consideration of your eligibility to receive (or continue to receive) an incapacity pension, we will only hold that information for as long as the pension is subject to review. Sensitive information (other than medical information) will be held for no more than 12 months unless we and the individual to whom the sensitive data relates agree otherwise.
- 10.4 In the event that the Scheme winds up or we cease to be Trustee of the Scheme, we may enter into an agreement to transfer the personal information we hold to another party (most likely to be RM Education Limited).

11. YOUR RIGHTS

You have certain rights with respect to your personal information. These rights only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights by contacting the Scheme secretary, at Vidett, 3rd Floor Forbury Works, 37-43 Blagrove Street, Reading, RG1 1PZ, or via email at RMPLC@vidett.com

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary for the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate so that our use of your information is suspended for such period as is necessary to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party). You also have an absolute right to object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the Information Commissioner's Office, where you think that we have not used your personal information in accordance with data protection law.

12. CHANGES TO THIS POLICY

Any changes we make to this Policy in the future will be agreed at a Trustee meeting. This Policy will be reviewed annually, unless we later decide that a different period is appropriate. You can view a copy of the current Policy on the Scheme website at <https://rmpensions.co.uk/rm-scheme-documents/> or you can request a copy of the current Policy at any time by using the contact details below.

13. QUERIES/CONTACT US

If you have any questions regarding this Policy or the way we use your personal information, you can contact our Scheme secretary by email at RMPlc@vidett.com or on 0118 207 2900.

This Policy was updated and adopted by the Trustee on 1 July 2024.