

## The Taylor Wimpey Pension Scheme (the "Scheme")

# Data Protection Privacy Notice

Taylor Wimpey Pension Trustees Limited (the "**Trustee**" "**we**"), is the trustee of the Scheme and holds and processes personal data about Scheme members ("**you**") and beneficiaries in order to administer the Scheme. In doing so, we comply with relevant data protection legislation.

### What do we do with your data?

As a data controller, the Trustee collects and processes your personal data to comply with its legal duties to administer the Scheme. We also process your personal data for other legitimate purposes relating to the operation of the Scheme for example to:

- ensure that the Scheme is funded appropriately
- properly manage the Scheme's investments
- improve the accuracy of the Scheme's valuation assumptions
- implement risk management exercises
- secure benefits with an insurer
- contact members with details of different benefit options they may wish to take up

Whilst much of the data we hold has been provided by you, we also hold and process data provided by Taylor Wimpey UK Limited (the Scheme's sponsoring employer) (the "**Company**"), other schemes from which members have transferred<sup>1</sup>, HMRC, the Department for Work and Pensions and other regulatory bodies and by tracing organisations. We also receive information from you about your proposed beneficiaries who would be eligible to receive benefits from the Scheme in the event of your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not separately provide a copy of this notice to those individuals.

The data we hold assists us in calculating, administering and paying the benefits that you are entitled to and includes your name, address, salary, years of service in the Scheme, date of birth, NI number and contact details. This is not an exhaustive list and we may, from time to time, hold other data about you in order to correctly administer the Scheme.

We sometimes hold some special categories or "sensitive" data about you for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We may process this information without your consent where the processing is necessary for the purpose of carrying out and exercising the Trustee's obligation to administer the Scheme. Where we are relying on your consent to process your sensitive data, you can withdraw it at any time.

### Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, the Scheme's administrator (currently Hymans Robertson LLP), the Scheme actuary and actuarial team (currently Robert Birmingham and Xafinity Consulting), the Company's in-house pension team, our legal advisers (currently CMS Cameron McKenna Nabarro Olswang LLP), our auditor (currently PricewaterhouseCoopers LLP), our buy-in providers (currently Just Group plc) and their reinsurers (currently Reinsurance Group of America), medical advisers, communications providers, tracing organisations, investment managers, AVC/DC section providers, annuity and insurance brokers, insurance providers, member financial advisers, HMRC, the Department for Work and Pensions, the Pensions Regulator, the Pensions Ombudsman, the Pensions Advisory Service and other third parties who we rely on to properly administer the Scheme and related insurance policies.

<sup>1</sup>The other schemes from which members transferred include the George Wimpey Staff Pension Scheme, the Taylor Woodrow Group Pension and Life Assurance Fund, the Bryant Group Pension Scheme, the Prestoplan Homes Pension Scheme, the Wainhomes Limited Pension Scheme and the Wilson Connolly Holdings Pension Scheme

In some circumstances responsibility for your personal data is shared with the Scheme actuary and our legal advisers, auditor, medical advisers and insurance providers who may process your data to comply with their professional/regulatory duties as advisers to the Trustee.

The current Scheme Actuary, Robert Birmingham FFA, and Xafinity Consulting Limited when providing defined benefits actuarial consulting services, are data controllers in common with the Trustee and so we share your personal information with Xafinity in order for them to provide these services. The Xafinity Privacy Information is available at <http://www.xafinity.com/about/Your-Privacy> which may change from time to time.

The Company holds personal data to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in a cost-effective way and may have an interest in offering certain options to members. We will share information with the Company and its auditors and advisers and other Group companies for this purpose. In addition, we may make your personal data available to the trustee(s), administrators or professional advisers of any pension arrangement to or from which your rights under the Scheme may be, are being or have been transferred, or to any company participating in such a pension arrangement.

From time to time the Trustee, the Company and other advisers and appointed third parties may transfer personal data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place to protect your personal data including the use of EU Model Clauses or Binding Corporate Rules.

## Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our general policy is therefore to retain information relating to you for the duration of your lifetime. Once your membership of the Scheme ends, for example, if you transfer your benefits out of the Scheme or take them as a lump sum, we will hold onto your data for up to 20 years. However, information may be held for longer where we consider it appropriate to make sure the Scheme pays the correct benefits and to deal with any queries which arise after that time.

Hymans Robertson will retain your personal data for no more than 20 years after the termination of their contract with the Trustee. The data will be securely archived after 7 years and permanently deleted after 20 years. This is to protect themselves against any subsequent legal claims.

Just Group will retain personal data and, where relevant, sensitive personal data for the life of the Scheme and for a period following to comply with their legal and regulatory obligations to exercise, administer or defend legal rights and claims. Personal data will also be retained by Just Group for business, analysis and statistical research purposes for 7 years from the end of the life of the Scheme.

## Your rights

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you can withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we will not be able to pay out the benefits to which you are entitled.

Please notify Hymans Robertson LLP as soon as possible if your personal circumstances, such as your nominated beneficiaries, or contact details change.

## Contact details

If you have any questions about this please contact us using the following details:

**Post:** Secretary to the Trustee, Taylor Wimpey Pensions, Unit 2 Tournament Court, Edgehill Drive, Warwick CV34 6LG

**Email:** [pensions@taylorwimpey.com](mailto:pensions@taylorwimpey.com)

**Phone:** 01926 516985

## What if you have a complaint?

To make a complaint about how we've handled your information, contact us as set out above.

If you're not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

**Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

**Phone:** 0303 123 1113 or 01625 545 745

The Trustee reserves the right to amend this privacy notice from time to time.