

***Xafinity Scheme Actuary, Alec Buck FIA, and Xafinity Consulting Limited (Xafinity);
Your 'data'***

We take looking after your personal information (known as 'data') very seriously and we are committed to ensuring that it is only used for the specific purposes set out below and that it is secure at all times:

- The Xafinity Scheme Actuary's role (the Scheme Actuary) is mainly to advise the pension scheme trustee on how well the pension scheme is funded;
- Xafinity Consulting Limited's role is to provide the pension scheme trustee and / or sponsoring employer, defined benefits scheme actuarial consulting services;

In order to be able to provide these services (our Services), we need to access your personal information.

When providing these Services, the Scheme Actuary and Xafinity Consulting Limited are Data Controllers in common with the pension scheme trustee and / or sponsoring employer. This means that we are each legally responsible for our own compliance with data protection laws in relation to each of our respective processing activities. Our contact details are provided at the end of this notice.

Where do we get your information from?

Your data is provided to us by the pension scheme trustee and their appointed pension scheme administrator. Some information may also be provided by the sponsoring employer.

How will we use your data?

- The Scheme Actuary must, by law, provide certain calculations and advice to the pension scheme trustee;
- Xafinity Consulting Limited has what's called a 'legitimate interest' to process your data, via an appointment by the pension scheme trustee and / or sponsoring employer to provide these Services.

Your data will **only** be used in accordance with our Terms of Engagement with the pension scheme trustee and / or sponsoring employer and **only** if it is necessary for us to undertake these Services.

What information do we need and why?

Your information is used to:

- advise on and value the pension scheme's liabilities, and assess how any shortfall can be funded;
- advise on or calculate the benefits available to individuals under various scheme options (e.g. on transfer to another scheme);
- advise the pension scheme trustee on the scheme's investments;
- provide technical guidance on pensions' legislation to the trustee, the sponsoring employer and certain members of the pension scheme.

The information we need about you in order to provide these Services includes:

- name;
- date of birth;
- sex;
- marital status and dependant's date of birth and sex;
- address;
- employment service information;
- salary and pension amounts; and
- whether a pension in payment resulted from ill health retirement. In this circumstance, we don't process data about your state of health, only that you are in receipt of such a pension, and this data will only be used if passed to us by the scheme trustee or pension scheme administrator.

Who do we share your information with?

We only share your information with third parties if it is necessary for us to provide our Services. This means that your information may be shared with:

- the pension scheme trustee and / or sponsoring employer;
- the pension scheme administrator and the various advisers appointed by the pension scheme trustee;
- other companies within the wider Xafinity group (but only for the purposes of providing our Services to the pension scheme trustee and / or sponsoring employer);
- law enforcement agencies (subject to any requests being legally made);
- regulators as required (including HMRC, the Pensions Regulator, the Financial Conduct Authority and the Information Commissioner's Office);
- fraud prevention agencies so that we may comply with money laundering and financial crime prevention laws; and
- certain approved suppliers used by Xafinity. These may include suppliers of printing and mailing services, offsite storage, hosting of administration systems, computer systems databases, information technology services and electronic and paper documentation management.

Your data is not shared with any other party and will not be transferred to anyone outside the European Economic Area.

What are your rights?

You have the right to:

- request copies of the personal data we hold about you and we will provide that within 30 calendar days. If you wish to do so you should contact us at the address below;
- correct any information that is incorrect, inaccurate or incomplete;
- restrict what we do with your information until we correct it or if you believe we are using your data unlawfully;

You also have the right, although only in respect of our provision of actuarial consulting services, to:

- object to our processing based on legitimate interests; however, you must have grounds (to object) based on your particular situation.

Xafinity has formal, documented Information Security and Data Protection policies that set out the security measures currently implemented and maintained. These core policies are supported by additional policies covering our use of data encryption, physical security of our offices and data centres and acceptable usage of email, internet facilities and telephone. Copies of these policies are available on request.

How long do we keep the information for?

We retain your information for a number of reasons including to demonstrate that the scheme has complied with its rules, and that Xafinity is meeting its contractual obligations. This means that we keep all of your information whilst providing our Services, even if you cease to be a member, and following the termination of Services to the pension scheme trustee and / or sponsoring employer, until any possible legal responsibilities or liabilities have ended.

This means we will normally hold information for up to a period of 12 years following the end of each of our Scheme Actuary, or actuarial consulting appointments.

How to complain

If you're not happy with how we process your data you will have the right to complain to the Information Commissioner and we can provide details about how to do that.

Contacting Xafinity

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