

**Cambridge Colleges Federated Pension Scheme (the “Scheme”)
Privacy and fair processing notice**

This privacy and fair processing notice is for information only and you do not need to take any action. Your privacy is important to us.

As Trustees of the Scheme, we hold a lot of personal information about the Scheme’s beneficiaries. Your data is held by the Scheme’s administrators, currently the Pensions Department at the University of Cambridge. We understand the importance of keeping this information private and secure, and we are committed to doing so in a fair and transparent way.

This privacy notice summarises how and why the Trustees collect your personal information, what we do with it and what rights you have in relation to it. It covers all personal information that we collect and use in relation to the Scheme in our role as data controller under the data protection legislation.

Why we need personal information

The Trustees need personal information in order to run the Scheme correctly. This includes such things as calculating and paying benefits, communicating with members and potential beneficiaries, making benefit decisions (such as early retirement requests or the distribution of death benefits), obtaining advice, making transfer payments to other pension arrangements, and making decisions in relation to investment, funding and benefit options exercises.

What personal information we need

The Trustees only collect and use information that is relevant to the Scheme. Depending on your circumstances, this may include name, date of birth, National Insurance number, contact information, bank account details, gender, marital status, dependants, health information, details of other pension arrangements and employment details including salary, level of contributions, length of service, employment grade, part-time working and non-pensionable absences.

Who provides personal information

We collect information from different sources, including:

Scheme beneficiaries and potential beneficiaries. This includes members, those who are or may be entitled to benefits from the Scheme on the death of a member and anyone claiming a connection to the Scheme as part of the Internal Dispute Resolution Process. Such people may provide personal information about themselves and/or about other people (for example, a member may provide information about himself and the people who may receive Scheme benefits when the member dies).

Third parties. We also collect personal information from other parties, where this is relevant to the Scheme. This includes employers, government bodies or departments (such as HMRC), personal

representatives, medical advisers (for example in relation to ill health early retirement applications) and tracing agencies.

Why information is provided

Members may be required by their employment contract to provide certain information to us, or it may be provided as a condition of Scheme membership. If a member chooses not to provide relevant information to the Trustees, we will not be able to correctly administer benefits under the Scheme for that member or his/her potential beneficiaries.

Beneficiaries following the death of a member are generally not obliged to provide information to the Trustees, but we may be unable to calculate and pay benefits correctly without it.

Some information has to be provided to us by law, such as when members tell us about benefits taken from another pension arrangement.

Sharing personal information

The Trustees will need to share Scheme personal information with others in order to run the Scheme properly. This might include:

Advisers and service providers. The Trustees are assisted by advisers and service providers (many of whom are listed in the Scheme's annual report and accounts, which is available to members and beneficiaries on request). The Trustees may share Scheme personal information with these third parties in connection with the advice or services that they provide to us. The third parties may also disclose this personal information to sub-contractors, in relation to services provided to the Trustees. In order to administer your pension, we may occasionally need to check your identity using a secure online system, which may leave an online footprint. This will have no bearing on your online records and is not a credit search.

Employers. The Trustees might share Scheme personal information with the Scheme's employers or their advisers, for example in relation to an ill health retirement application, a business sale, Scheme funding discussions or benefit options exercises.

Others. Other situations in which the Trustees might share Scheme personal information include insuring, transferring or securing benefits (in which case information may be shared with insurance companies or the trustees/managers of other pension schemes, and their advisers) or if the Trustees are complying with a legal or regulatory requirement (for example, providing information to HMRC, the Pensions Ombudsman or the Pensions Regulator).

This list is not exhaustive and from time to time, the Trustees may need to share Scheme personal information with other organisations in order to administer the Scheme. In keeping with the Trustees' duty to act in the best interests of Scheme beneficiaries and our other legal obligations, we will only share personal information when necessary and fair, and when we are satisfied that it will remain secure.

The Trustees do not intend to transfer personal information outside the EU. If someone with whom we share personal information wants to transfer it outside the EU (as may be the case if they have operations outside the EU) we will consider this on a case by case basis, taking the security of the information into account.

We will not share or transfer personal information to a third party for the purposes of marketing.

Storage and destruction

The Trustees will hold personal information for as long as it is required to correctly administer the Scheme and for the purposes of maintaining records of the Trustees' compliance with their obligations. This could be a long period of time, spanning a member's lifetime, and that of his/her beneficiaries who receive benefits after the member's death. Personal information may need to be kept even after entitlement to benefits from the Scheme has ceased.

The Trustees regularly review the information that we hold. If we decide that we no longer need it, it will be destroyed. Any processing of your data once you have transferred out of the Scheme or all your benefits have been paid in full will only take place where strictly necessary.

The legal bit

Data controllers. Under the law, the Trustees are "data controllers", together with the Scheme's actuarial advisers and the individual Scheme actuary. This means that we are responsible for deciding how we hold and use your personal information. Data controllers owe special duties in relation to the personal information that they have.

Legal grounds. The legal grounds on which the Trustees hold and use personal information is that it is necessary for us to be able to comply with our legal obligations in relation to you and the Scheme. We may also carry out limited administrative processing necessary for our legitimate interest in the proper running of the Scheme (where that processing is not unwarranted and would be within your reasonable expectations).

Sensitive information. Some personal information is particularly sensitive and deserves additional protection. This includes information about health, sexual orientation, religious belief or membership of a trade union or political party. The Trustees might need to use sensitive personal information in some circumstances, including to consider an application for ill-health retirement or decide who will receive benefits after a member's death. It may also be relevant when deciding on appropriate communications with beneficiaries, for example coordinating with trade unions, or putting special arrangements in place for beneficiaries suffering from ill health.

The legal grounds on which the Trustees hold and use sensitive personal information are that:

- It is necessary for reasons of substantial public interest (as authorised by statute);
- It is necessary for performing our obligations and exercising our rights in connection with employment, social security and social protection law (as authorised by statute); or

- We have obtained explicit consent. Where this is the case, consent can be withdrawn at any time without affecting the lawfulness of the prior use and storage of the relevant information.

Future changes. Whilst the content of this privacy notice is accurate at the date of issue, the Trustees may need to make changes in the future. You will be notified of any relevant changes.

Your rights

You have the right to access the personal information that we hold about you. You can also ask us to correct any errors and, in certain circumstances, you can request that the use of your personal information is restricted. Where the processing is taking place in pursuit of our legitimate interests, you also have the right to object to that processing or request that your personal information is erased. Please contact the scheme office in relation to any such requests (contact details below).

If you would like further information about your rights, you can look at the website of the Information Commissioners Office (www.ico.org.uk) or you can contact the scheme office (contact details below).

If you have any issue in relation to the Trustees' handling of your personal information, please contact the scheme office (contact details below). If we cannot resolve it to your satisfaction, you can follow the Scheme's more formal Internal Disputes Resolution Procedure. At any time, you also have a right to lodge a complaint with the Information Commissioner's Office at:

Information Commissioner's Office
Wycliffe House Water Lane Wilmslow Cheshire
SK9 5AF
Tel: 0303 1231113 or 01625 545700
Fax: 01625 524510

Email: casework@ico.org.uk

Contact details

If you have any questions about this privacy notice please contact the scheme office at:

pensionsonline@admin.cam.ac.uk

Or

Pensions Administration
Greenwich House
Madingley Road
Cambridge
CB3 0TX