



LPF MEMBER PRIVACY POLICY

2024

INTRODUCTION

This privacy policy has been prepared for the members and beneficiaries of Lothian Pension Fund (LPF), also known as the Fund. LPF is a Local Government Pension Scheme which administers pensions on behalf of c.60 employers and c.87,000 members.

The administering authority of the Fund is the City of Edinburgh Council. City of Edinburgh Council is also the data controller of the Fund and is registered with the Information Commissioner's Office under registration number Z5545409.

This privacy notice is available on LPF's website. It's important that you read this ~~privacy~~ notice together with any other privacy notice or fair processing policy we provide on specific occasions when we're collecting or processing personal data about you, so that you're fully aware of how and why we collect and use your data in accordance with data protection legislation. This privacy notice replaces any version previously issued and supplements any other notices and privacy policies we issue that are specific to particular data collection/processing activities.

We hold certain information about you and from which you can be identified ("personal data") which we use to administer the Fund and to pay benefits from it. We process your data (and personal data relating to your beneficiaries) in order to contact you, to calculate, secure and pay your benefits, for statistical and financial modelling and for reference purposes (for example, when we assess how much money is needed to provide members' benefits and how that money should be invested), and to manage liabilities and administer the Fund generally.

WHY CAN THE FUND PROCESS MY PERSONAL DATA

Data protection law provides that Data Controllers may only process personal data if they've a lawful basis to do so. Depending on the exact nature of the personal data and the reasons for processing it, the lawful basis may change. However, under the applicable law and regulations governing LPF's activities, we have a duty to provide and administer pensions for our members and to invest and safeguard the assets of the Fund. So, usually, the reason we process your personal data is that we need to do so to satisfy our legal obligations as the administering authority of the Fund.

However, where the legal basis above does not apply, then the legal basis for our use of your personal data will be one or more of the following:

- We need to process your personal data to carry out a task in the public interest or in the exercise of official authority in our capacity as a public body
- We need to process your personal data for the legitimate interests of administering and managing the Fund and liabilities under it, calculating, securing and paying benefits and performing our obligations and exercising any rights, duties and discretions the administering authority has in relation to the Fund
- We need to process your personal data to meet our contractual obligations to you in relation to the Fund (for example, under an agreement that you will pay additional voluntary contributions to the Fund), or to take steps, at your request, before entering into a contract.

WHAT INFORMATION DOES LPF HOLD ABOUT ME?

The types of personal data we hold and process about you can include:

- Contact details, including name, address, email address and telephone numbers
- Identifying details, including date of birth, national insurance number and employee and membership numbers
- Information that's used to calculate and assess eligibility for benefits, for example length of service or membership and salary information
- Financial information relevant to the calculation or payment of benefits, for example bank and tax details
- Information about your family, dependants or personal circumstances, for example marital status and information relevant to the distribution and allocation of benefits payable on death
- Information about your health, for example to assess eligibility for benefits payable on ill health (but note we do not normally require information on the underlying medical assessment to determine whether you are eligible) or where your health is relevant to a claim for benefits following the death of a member of the Fund
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Fund and the employer or Fund may be reimbursed from your benefits.

We obtain some of this personal data directly from you by asking you to fill in forms on our website (and to register to use My Pension Online) or to subscribe to receive e-newsletters or other services. We may also ask you to take part in customer feedback to improve our services.

We will keep:

- Details of any services you request or amendments you make during visits to our website
- Details of your visits to our online services, including your IP address
- Records of correspondence you send to us, where appropriate.

When we're in contact with you by phone, we'll collect and store your phone number and a recording of the call.

In addition to the information you provide us, we may also receive personal data about you from other sources.

We may obtain data (for example, salary information) from your current or past employer(s) or companies that succeeded them in business, from a member of LPF (where you are or could be a beneficiary of the Fund as a consequence of that person's membership of the Fund) and from a variety of other sources, including public databases (such as the Register of Births, Deaths and Marriages), our advisers and government or regulatory bodies.

Occupational health providers, AVC providers, solicitors, your previous pension scheme, and HMRC may also provide us with your personal data.

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this

data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying us in writing. However, if you do not give consent, or subsequently withdraw it, we may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Fund, please ensure that those individuals are aware of the information contained within this notice.

HOW DOES LPF USE MY PERSONAL DATA

We use information held about you to administer your pension benefits and manage the LPF pension fund, including:

- To contact you
- To assess eligibility for, calculate and provide you (and, if you are a member of the Fund, your beneficiaries upon your death) with benefits
- To identify your potential or actual benefit options and, where relevant, implement those options
- To allow alternative ways of delivering your benefits, for example, through transfers to or mergers with other pension arrangements
- For statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members' and beneficiaries' benefits and how that money should be invested)
- To assess and, if appropriate, action a request you make to transfer your benefits out of LPF
- To comply with our legal and regulatory obligations as the administering authority of LPF
- To address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Fund
- In connection with the sale, merger or corporate reorganisation of or transfer of a business by the employers that participate in the Fund and their group companies
- To allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements
- To prevent fraud in relation to your pension benefits

WHO DOES LPF SHARE MY PERSONAL DATA WITH?

From time to time we'll share your personal data with advisers and service providers so they can help us carry out our duties, rights and discretions in relation to the Fund. Some of those organisations will simply process your personal data on our behalf and in accordance with our instructions; they're referred to as processors. Other organisations will be responsible to you directly for their use of personal data that we share with them; they're referred to as controllers. In each case, we'll only do this to the extent that we consider the information is reasonably required for these purposes.

Whenever one of our advisers or service providers acts as a joint controller with us in respect of your personal data, because we jointly determine the purposes and means of processing it, we'll agree with them how we are each going to meet our respective and collective obligations under the data protection law. If you would like more information about how such arrangements work, please get in touch using the contact details below.

The organisations that we may share your personal data with may include the following advisers and service providers:

Processors	Controllers
Heywood Limited provides LPF's pensions administration software, providing us with technical and management support for its electronic pensions administration systems.	Hymans Robertson LLP provides Scheme Actuary services for the purpose of calculating the Fund's assets and liabilities and setting employer contribution rates. Hymans Robertson LLP may appoint service providers or sub-processors to help in the provision of their services. For details, please visit: https://www.hymans.co.uk/information/trust-centre/
Club Vita LLP provides longevity (life expectancy) analytics and related information for the purpose of helping us to manage LPF's liabilities.	PAM provides occupational health services in connection with matters such as ill-health retiral applications for deferred members.
Tracing bureaus for mortality screening and locating members and beneficiaries, including Capita Pension Solutions Limited, GB Group plc and Crown Agents Bank Limited . More detail on how Crown Agents Bank handles personal data is available here: https://www.crownagentsbank.com/app/uploads/2021/10/CAB-Privacy-Notice-Service-Users-2021.pdf .	Legal advisers in connection with providing advice on issues related to specific members.
Credit reference agencies, including TransUnion , for identity verification and fraud prevention purposes. TransUnion's relevant privacy policy and further information about TransUnion's activities is available at https://www.transunion.co.uk/legal/privacy-centre?#pc-bureau .	Prudential and Standard Life provide scheme AVCs and create individual member AVC accounts.
Crown Agents Bank also provide overseas payment services to transmit payments to Fund members and beneficiaries with non-UK accounts.	South Yorkshire Pensions Authority provides the LGPS National Insurance Database for the purpose of identifying if Fund members have benefits in other LGPS schemes.
Suppliers of IT services, document production and distribution services.	Administering authorities of other LGPS funds (or their agents, such as third-party administrators), depending on circumstances, where a member has also has service with another LGPS fund, and the

	information is needed to determine the benefits to which the member or their dependants are entitled.
	Department for Work and Pensions (DWP) provides the Tell Us Once service for the purpose of notifying LPF of the death of scheme members.

STORAGE AND RETENTION

Your data won't be kept for any longer than it's needed by LPF to carry out our processing activities, and for so long afterwards as we consider may be required to deal with any questions or complaints about the administration of the Fund, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations.

LPF has a Records Retention Schedule which governs how long your records will be kept. In practice, this means that your personal data will be retained for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from LPF and for a suitable period after those benefits stop being paid. For the same reason, your personal data may also need to be retained where you have received a transfer, or refund, from LPF in respect of your benefit entitlement.

Your data will be stored securely by LPF's pensions administration software provider, Heywood Limited. Its registered address is Aquila House, 35 London Road, Redhill, Surrey RH1 1NJ. Your data may also be hosted on LPF's corporate network, in accordance with LPF's Records Management Policy.

WHAT ARE MY RIGHTS?

You have the right to request access to any data which we may keep on you. If any information kept about you is inaccurate or incomplete, you have the right to request that the information be corrected. In very limited circumstances, you may also have a right to ask us to restrict the processing of your personal data, or to transfer or (in extremely limited circumstances, such as where your personal data is no longer needed for the purpose for which it is being processed) erase your personal data. You should note that we are not obliged to erase your personal data if we need to process it for the purposes of administering the Fund.

In certain circumstances, you have the right to object to the processing of your personal data; for example, you have the right to object to processing of your personal data which is based on the public interest or legitimate interests identified in the section above headed 'Why can the Fund process my personal data?'.

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact LPF using the details provided below. You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you feel your data isn't being managed properly. More information on how to do this can be found at <https://ico.org.uk/concerns/>.

As explained above, one of the reasons we collect and hold your personal data is to administer your benefits. If you don't provide the information we request, ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits, including the payment of benefits from LPF. In some cases, it could mean we're unable to put your pension into payment or have to stop your pension, if already in payment.

GET IN TOUCH

If you have a question, please use one of the following ways to get in touch:

- By email: pensions@lpf.org.uk
- By telephone: 0333 996 1900
- By mail: Lothian Pension Fund, PO Box 24158, Edinburgh, EH3 1GY

DATA PROTECTION OFFICER

The Fund's Data Protection Officer is Kevin Wilbraham, City of Edinburgh Council's Information Governance and Strategic Complaints Manager, Information Governance Unit, City of Edinburgh Council, Waverley Court - 2.1, 4 East Market Street, Edinburgh EH8 8BG, Email: dataprotectionofficer@edinburgh.gov.uk, Tel: 0131 200 2340.

UPDATES

Any future changes to this policy will be posted online and, where appropriate, you'll be notified by post or email. Regularly reviewing this page will ensure you're always aware of what we're doing with your personal data, and we will communicate material changes to the policy to you.

This Privacy Policy was last updated in February 2024.