

# Privacy Notice

UK Power Networks Group of the Electricity  
Supply Pension Scheme (UKPN ESPS)



## Contents

Who we are	3
Our data protection obligations to you	3
What information do we collect about you?	4
How do we use that information?	4
Who do we share it with?	5
How long do we keep personal data for?	6
Your rights concerning your personal data	6
Changes to the privacy policy	7
Who to contact about your personal data	7
Making a complaint to the Information Commissioner's Office (ICO)	7

## Who we are

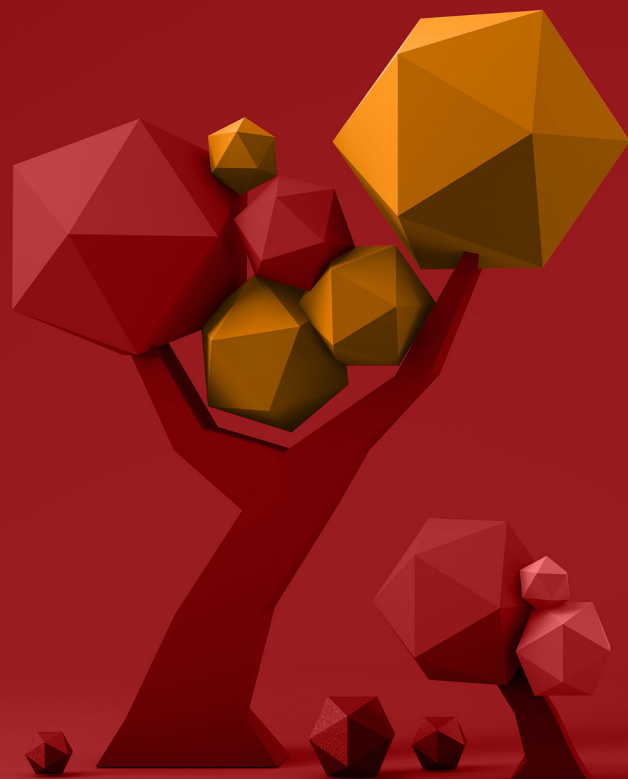
As the Group Trustees (“we”) of the UK Power Networks Group of the Electricity Supply Pension Scheme (“the Scheme”), we hold certain personal information (known as “personal data”) about members and, where applicable, their dependants and beneficiaries. Most of the personal data we hold and process in running the Scheme will be personal data (in other words, it is information from which you as an individual can be identified). The Group Trustee’s address is:

### **UK Power Networks Group (Trustee) Limited**

Pension Services  
Energy House  
Hazelwick Avenue  
Three Bridges  
Crawley  
West Sussex  
RH10 1EX

## Our data protection obligations to you

We will collect, store, and process personal data about individuals such as Scheme members, their dependants, and other beneficiaries, and recognise the need to treat personal data in an appropriate and lawful manner in accordance with the applicable data protection laws.



## What information do we collect about you?

Depending on the circumstances and the stage of your membership of the Scheme, we may hold some or all of the following information about you:

- Your name and date of birth.
- Your e-mail and home address.
- Your National Insurance number.
- Details of your salary and salary history.
- Details of your bank account to pay benefits to if you are a pensioner or if we are paying a lump sum to you.
- Details about your dependants and/or beneficiaries where this is needed so that we can pay benefits following your death.
- Medical and other details about your health if you apply to begin to receive benefits because of ill health.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. This is known as “sensitive personal data” and it includes information that relates to health, sexual orientation, and trade union membership. If you have not previously supplied this information you will not be required to provide it at this time. We will not process sensitive personal data without your explicit consent and we will provide you with a separate privacy notice if we request your consent to process sensitive personal data.

## How do we use that information?

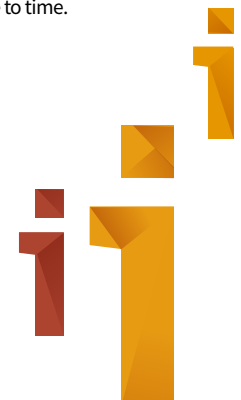
We need to hold and process your personal data, as it is needed for us to administer the Scheme and to calculate and pay benefits. In legal terms, this means that we have a legitimate interest in processing the information for this purpose. We also keep the above information in order to allow us to comply with our obligations towards members under the governing documents of the Scheme. We will not collect any personal data from you that we do not need.

Personal data relating to the Scheme is held on paper and on computer systems. As the “data controller” under the data protection laws, we must process this information fairly and lawfully.

## Who do we share it with?

We are not allowed to share personal data about you with other organisations and people, unless the law allows us to, or it is in our legitimate interests to do so, or you have given your consent. As we need to share information with others in order to provide you with benefits, we have a legitimate interest in the sharing of this information. We share personal data with the following:

- UKPN Pension Services, who are responsible for the day-to-day administration of the Scheme on behalf of the Group Trustees.
- Your employer (i.e. the company that employs you while you are or were a member) and other companies in the group.
- The Scheme’s professional advisers, including the Scheme actuary, auditor, Additional Voluntary Contribution providers, and lawyers. In particular, the Scheme actuary will be using personal data as a joint data controller with us for the purpose of calculating and verifying risks associated with the Scheme. This is in our legitimate interests. The Scheme lawyers will be using personal data as a separate data controller to provide us with legal advice. This is also in our legitimate interests. Further information about the Scheme actuary and the lawyers we use are provided in our Annual Report and Financial Statements.
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – we can be fined if we fail to provide certain information to these authorities.
- The advisers and printers who help us prepare various communications we send to you, such as Pensions News and your annual benefit statement.
- Our appointed insurance company or companies for the purposes of life insurance.
- Depending upon how we pay pensions, the personal data we have to supply in order to make a BACS transfer (the Bankers’ Automated Clearing Service) in the UK and/or a payment when pensions are being paid overseas.
- Tracing agencies who assist us with updating Scheme data from time to time.



## How long do we keep personal data for?

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. However, given the nature of pension schemes, we will keep personal data relating to Scheme members for as long as they (or their dependants or beneficiaries) have an entitlement to any form of benefit; and for such further period as may be appropriate to reflect the possibility of further enquiries into our conduct in administering the benefits to the affected individuals.

We review the personal data held in relation to the Scheme on a periodic basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, it will be destroyed. We will delete the relevant data in accordance with our policy.

## Your rights concerning your personal data

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine-readable (namely, digital) format.
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected.
- You can require us to restrict or limit the processing of your personal data in certain circumstances (for example, while a complaint about its accuracy is being resolved).
- You can object to your personal data being processed, although we can override such an objection in specific instances.
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact about your personal data” on the opposite page).
- You can request that your personal data is deleted altogether in certain circumstances.

You should be aware that taking any of the above steps could affect the payment of your benefits, the ability for you to build up benefits, and our ability to answer questions relating to your benefits. Information will generally be provided to you free of charge, although we can charge a reasonable fee for this in certain circumstances.

## Changes to the privacy policy

We may be required, under legislation, to amend this privacy policy in the future. Details of amendments will be included in our Newsletters.

## Who to contact about your personal data

If you wish to:

- See your personal data or exercise any of the rights mentioned above OR
- Make a complaint about how we have handled your personal data

Please contact:

**UK Power Networks**  
Pension Services  
Energy House  
Hazelwick Avenue  
Crawley  
West Sussex, RH10 1EX

Tel: 0333 009 0007

Email: [pensionservices@ukpowernetworks.co.uk](mailto:pensionservices@ukpowernetworks.co.uk)



If you have any concerns about how we use your personal data, you may raise a complaint with us using the contact details set out above. We will investigate and respond in accordance with our complaints handling process. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters. For full details of how we will handle Data Protection Complaints, please refer to the Group Trustee's Internal Dispute Resolution Procedure, which includes a standalone Data Protection Complaints section (see Part One - Data Protection Complaints), which can be requested from Pension Services.

## Making a complaint to the Information Commissioner's Office (ICO)

The ICO is the UK body responsible for the enforcement of the General Data Protection Regulation and the Freedom of Information Act. It is an independent authority that upholds information rights in the public interest and promotes openness by public bodies and data privacy for individuals.

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office, whose helpline number is: **0303 123 1113**.

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