SPENCE

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International Motors Limited Retirement Benefits Scheme ("the Scheme") Updated Data Privacy Notice

BACKGROUND

This statement sets out how the Trustees of the International Motors Limited Retirement Benefits Scheme ("the Trustees") handle personal information in compliance with the General Data Protection Regulations (the "Regulations") following the change in the provider of administration, actuarial and consultancy services from Hughes Price Walker ("HPW") to Spence & Partners Limited ("Spence").

We recognise that the correct and lawful processing of personal data is important and integral to our successful operations and to maintaining the trust of the people we deal with. We fully endorse and adhere to the principles set out under the Regulations.

For the purposes of this statement, the term "personal data" shall refer to personal data and sensitive personal data.

The Trustees may act as Data Controller and a Data Processor in relation to the handling of the personal data and sensitive personal data of the persons/organisations we deal with.

PURPOSE AND LEGAL BASIS FOR PROCESSING THE PERSONAL DATA

The personal data that the Trustees will hold includes but is not limited to your name, address, date of birth, National Insurance details, financial details such as bank account numbers, tax details and marital status, as well as details of your children or other beneficiaries. We will also hold details of your salary history, membership dates and any contributions to your pension scheme. In addition, we will retain medical history information that you supplied to us, as this may affect your pension entitlement.

The reason we need to hold and process this data is so that we can properly administer your benefits and pay your pension and other benefits when they come into payment.

The Trustees may from time to time share this data with the administrators, actuary, HMRC, regulatory body or other professional advisers to the Scheme, in order to manage your benefits. The Trustees may also share the personal data with insurers to ensure that we provide your benefits in the most cost-effective way.

As Data Controller, the Trustees have a legal obligation to administer and pay your benefits from your Scheme. We will therefore hold and process your data on this legal basis. Both the Trustees and our advisers and administrators have their own legitimate interests for processing your data. You may object to the processing of your personal data on this basis, but your objection may be rejected by the Trustees if there are compelling reasons to do so.

When the Trustees are required to process your sensitive personal data, such as your medical records, the Trustees shall seek your explicit consent to do so. You may withdraw your consent to processing on this basis at any time.

The Trustees will hold and process your data for as long as we are legally required to do so, i.e. while we are responsible for the payment of benefits from the Scheme or for protection of our legitimate interests, and will do so in line with regulatory requirements. As pension benefits are a long-term undertaking and queries can arise many years into the future, it is not possible to give a specific period for which the data will be stored.

The Trustees may share your data with International Motors Ltd ("the Employer") in connection to their obligation to fund certain benefits under the Scheme. The Employer may use your data for the purposes of operating pensioner payroll, operating a bank account on behalf of the Trustees, preparing annual disclosures for the Employer's audited accounts, reviewing the funding position of the Scheme or providing information to the members about access to the pension freedoms (either via a one-off exercise or as a business-as-usual offering) or other member option exercises.

The Trustees are required by law to participate in the pensions dashboards programme. In order to comply with those obligations, personal data relating to members and beneficiaries may be shared with the Money and Pensions Service, pensions dashboard providers, integrated service providers and other parties involved in operating the dashboards ecosystem

Where we pass your data to a third party, we seek to ensure that they have appropriate data security measures in place to keep your information safe and to comply with the principles in relation to data protection.

The Trustees shall ensure that data is not transferred outside the EEA without appropriate safeguards being in place. Where the data is not transferred to an EU Commission approved country (or its replacement under Data Protection Legislation), appropriate contractual safeguards will be required. Under our existing arrangements, no data is currently transferred outside the EEA.

HOW DOES THE SCHEME ACTUARY USE YOUR DATA?

The Scheme Actuary also acts as a Data Controller and uses your personal data to advise the Trustees on the financial management of the Scheme. This advice helps to ensure the Trustees are able to meet their obligations to pay members' benefits and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI), which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustees.

INDIVIDUAL RIGHTS

The Trustees will fully respect your rights under the Regulations including:

1. You have the right to make a subject access request for free and which can be made electronically.

2. You have the right to make a subject access request to verify the lawfulness of the processing we are carrying out.

3. We will respond to your subject access request within one month of you making it.

4. You can request to correct your personal data if it is inaccurate, incomplete or out of date or request the deletion of your personal data.

5. You may obtain a copy of your personal information from us, except in limited circumstances.

6. You have the right to complain to the supervisory authority whose contact details are set out below.

COMPLAINTS

Any complaints relating to your data will be acknowledged within 30 days and will be investigated and responded to without undue delay.

Complaints relating to breaches of the Regulations and/or complaints that an individual's personal data is not being processed in line with the Data Protection Principles will be managed and processed by the Trustees.

All complaints of dissatisfaction will also be processed in accordance with the Trustees' Complaints Process and should be sent to:

International Motors Limited Retirement Benefits Scheme
c/o Spence & Partners Limited
Linen Loft
Adelaide Street
Belfast
BT2 8FE
Email – admin@spenceandpartners.co.uk

Without prejudice to any administrative or judicial remedy, you have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office (ICO), if you consider that the processing of your personal data infringes the principles of the Regulations. Their address is as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Alternatively, you can contact them through their website at: https://ico.org.uk/global/contact-us/