

Kingfisher Pension Scheme

Data Privacy Statement

As Trustee of the Scheme, we (Kingfisher Pension Trustee Limited) are committed to protecting your privacy and other rights under the data protection legislation (including the Data Protection Act 2018 and the UK General Data Protection Regulation). We are "data controllers" for the purpose of the legislation. This statement explains how we may collect, use and share your personal data.

Information we may collect from you

We may collect and process personal data which you provide to us in connection with the Scheme. This may include:

- your name and contact details,
- your date of birth, gender, and marital status,
- your National Insurance number,
- information as to your contributions to and options exercised under the Scheme,
- information as to your family members and dependants,
- (where benefits are payable to you) your bank details,
- a 'pensions identifier' or 'PeI' (a string of characters used to identify your specific benefits under the Scheme) if you have used a pensions dashboard (an online platform where you can access information about all of your pension benefits in the UK);
- a universally unique identifier ("UUID") applied by our pensions dashboard provider to link you to other schemes; and
- any other relevant information you provide to us in connection with the Scheme.

In addition, we may in some circumstances hold and process personal data about you which is deemed "sensitive" – such as information about your health (which we may hold and process if you apply for incapacity benefits).

Information which we may collect from others

We may receive and process personal data about you from the Kingfisher Group. This may include information relating to your employment, salary and benefit rights, to the extent relevant for the purpose of the Scheme.

We may on occasions collect personal data relating to you from other third parties such as HM Revenue & Customs and other regulatory authorities.

Processing your personal data

The purposes for which we may process your personal data and the legal basis on which we rely for such processing are:

Processing purpose	Types of personal data	Legal basis
Governance and administration of the	• Name and contact details	We have a legitimate interest in governance and

Processing purpose	Types of personal data	Legal basis
Scheme, including in particular the calculation, funding, securing and payment of benefits	• Date of birth, gender, and marital status • National Insurance number • Information about contributions and options exercised • Information about family members and dependants • Bank details • Information about employment, salary and benefit rights • Other relevant information provided to us	administration of the Scheme in accordance with its governing documents and applicable law, regulation and regulatory guidance
Compliance with our legal and regulatory obligations	• Name and contact details • Date of birth, gender, and marital status • National Insurance number • Information about contributions and options exercised • Information about family members and dependants • Bank details • Information about employment, salary and benefit rights • Other relevant information provided to us	The processing is necessary for compliance with our legal obligation
Determining whether an individual who submitted a request to a pensions dashboard to locate their pensions information (a 'Find Request') is a match to the Scheme's records.	• Information provided by you: • name and previous name(s) • address and previous address(es) • date of birth • National Insurance number • contact details such as email address and phone numbers	We have a legal obligation to provide pensions dashboards services. If we find you are not a Scheme member, we will delete your personal data as required to comply with pensions dashboard legislation.

Processing purpose	Types of personal data	Legal basis
	• employer name and details of your employment • other relevant information provided to us (including which we may request in order to identify if you have benefits under the Scheme). • Information relating to a Find Request may also be received from the Money and Pensions Service. • Where you have submitted a Find Request, we will record whether you are a full or partial match to our records, and may share this with the Money and Pensions Service so that an individual knows that we have matched them with a pension record.	
Allowing individuals to access or view their pensions dashboard (a 'View Request').	• The data that may be accessible through a pensions dashboard is: • Administrative data - such as scheme/fund name, types of benefit provided, date of birth, category of membership, when a member joined and, if available, start and end dates of pensionable service, and employer's name. • Value data - details of how much pension (or other benefits) an individual has built up already and, for active members of the Scheme, how much they may have when they retire.	We have a legal obligation to provide pensions dashboards services.

Processing purpose	Types of personal data	Legal basis
	Contextual information – this is provided such as the date as at which the pension and benefits are worked out and the date from which they are payable, whether pensions and benefits for survivors are included, and whether pensions may increase.	

If we are required to process your sensitive data (see above), we will approach you or the relevant individuals for specific consent to the processing:

Processing purpose	Types of sensitive data	Legal basis for processing
Determining your and your dependants' eligibility to receive benefits	Health information	We will have obtained your explicit consent to process your health data

Retention of personal data

We will hold personal data for as long as may be necessary in order to administer benefits and to maintain a record of steps which we have taken. This means that we may retain personal data for very long periods, including after entitlement to receive benefits has ceased.

We will keep our retention policy under review having regard to matters such as the period over which questions or claims as to benefits could realistically emerge.

Disclosure of personal data

In connection with the administration of the Scheme, we may share personal data about you with the following categories of recipients:

- companies in the Kingfisher Group,
- Scheme administrator (currently, Legal & General Assurance Society Limited, Aptia UK Limited),
- actuary (currently, Hymans Robertson LLP),
- accountants (currently, Grant Thornton UK LLP),
- lawyers (currently, Mayer Brown International LLP),
- investment advisers (currently, Lane Clark & Peacock LLP, AON Solutions UK Limited),
- investment providers,
- identity verifiers,
- tracing agencies,

- insurers (currently Legal and General Assurance Society Limited, Pension Insurance Corporation, Aviva Life & Pensions UK Limited),
- technical providers for pensions dashboard services (currently, Legal & General Assurance Society Limited, Aptia UK Limited),
- the third parties that form part of the pensions dashboard ecosystem that enables pensions dashboard services to work, including the Money and Pensions Service,
- other similar external advisers and service providers,
- actual or proposed counterparties, and
- HM Revenue & Customs, the Pensions Regulator, the Pensions Ombudsman, and other public or regulatory authorities.

We may also disclose your personal data to a third party where necessary to comply with a legal obligation or where you have requested us to share your personal data with the third party.

We will not disclose personal data to third parties for the purposes of marketing.

Where a third party processes personal data on our behalf, for example, because it is our service provider, we will ensure that the third party implements appropriate safeguards to protect your personal data. However, some of these third parties will be directly responsible for complying with the data protection legislation as data controllers.

The list of recipients is not exhaustive and the Trustee may from time to time need to share personal data with other third parties in connection with the administration of the Scheme, for example, if the Trustee engages a different service provider. The Trustee will update this Statement if the categories of recipient change.

International transfers of personal data

As required by data protection legislation, we have strict security procedures regarding the storage and disclosure of personal data. The personal data about you may be transferred outside the UK.

For example, your personal data may be transferred to recipients in the European Economic Area or organisations certified under the UK Extension to the EU-US Data Privacy Framework which the UK Government considers as offering an adequate level of data protection.

The personal data that we collect about you may also be transferred to, and stored at, or processed in one or more countries outside the UK which have not yet been deemed by the UK Government to offer adequate data protection. For example, the personal data may be processed by staff in India who work for service providers that process personal data on our behalf. In such cases, we will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under legislation (for example, by ensuring the recipient enters into an international data transfer agreement approved for this purpose). We will supply details of any such steps on request.

If we cannot ensure such an adequate level of data protection, your personal data will only be transferred outside the UK if you have consented to such transfer or one of the limited exemptions under the data protection legislation applies.

Automated decision-making

We do not envisage that we will take any decisions about you using solely automated means that will have a legal or similarly significant effect.

Your rights under data protection legislation

You have rights under the data protection legislation including the right to:

- **Access** your personal data – this right always applies, but there are certain exemptions which means you may not always receive all of your personal data that we process.
- **Correct** your personal data if it is inaccurate or incomplete – this right always applies.
- **Delete or remove** your personal data in certain circumstances, for example, if there is no reason for its continued storage and processing.
- **Restrict** the processing of your personal data in certain circumstances, for example, if you want us to establish its accuracy.
- **Object** to your personal data being processed where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing).
- **Transfer** your personal data to another party where we rely on your consent to process your personal data.
- **Withdraw your consent** at any time where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. Once we receive notification that you have withdrawn your consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. The withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal.

If you wish to exercise any of these rights, please contact us as explained below.

Our right to make changes

We reserve the right to make changes to this Data Privacy Statement. Where we do, we will notify you of the changes and post the revised version on <https://www.kingfisherpensions.com/>.

Complaints

Where you are dissatisfied with any aspect of our handling of your personal data you have a right to lodge a complaint with the Information Commissioner's Office:

Address: Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113



Website: <https://ico.org.uk/make-a-complaint/>

Further information

If you have any questions about the matters covered by this statement, please contact Kingfisher Pension Trustee Limited (KPTL) by one of the following means:

- By post to Kingfisher Pension Scheme, One Paddington Square, London, W2 1GG
- By email to Corporate.Pensions@kingfisher.com

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