

# Pension and Assurance Scheme for Non-Academic Staff (PASNAS)

## Data Protection Compliance Statement

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PASNAS (the Scheme) is a final salary pension and life assurance scheme provided and administered by the University of Southampton for its workers. The Scheme is administered by a board of Trustees in accordance with the Trust Deed and Rules.

The Trustees take their data protection responsibilities seriously. The Trustees and the Scheme's Actuary<sup>1</sup> and Legal Advisors<sup>2</sup> are the data controllers and support the aims of data protection legislation to strengthen the rights of individuals in respect of data relating to them and are committed to complying with their obligations when processing personal data, either as a data controller or as a data processor.

The Scheme's registration number with the Information Commissioner's Office is ZA222851.

The Trustees are ensuring compliance with their data protection obligations by:

1. Managing the data processed by the Scheme, inclusive of personal data, by holding regular Trustee meetings and consulting with the Scheme's professional advisors and administrators.
2. Completing internal information asset reviews to ensure the Scheme complies with the EU General Data Protection Regulation (EU) 2016/679 in respect of the personal data it processes.
3. Only obtaining your data either directly from you, from your University employment or payroll record or from third party sources, such as a previous pension provider you have advised us of. The Trustees will always look to ensure that any third party has the lawful authority to share the data.
4. Ensuring that personal data is processed in accordance with an appropriate legal basis and by advising data subjects of their rights.
5. Employing a 'data protection by design' approach to systems engineering and projects that promotes and incorporates privacy and data protection considerations from the outset as well as reviewing the level of safeguards required for protecting

<sup>1</sup>The Trustees' actuarial advisor is currently Barnett Waddingham LLP. Details of how they carry out their obligations in relation to personal data can be found at their website: <https://www.barnett-waddingham.co.uk/privacy-policy/>

<sup>2</sup> The Trustees' legal adviser is currently Squire Patton Boggs (UK) LLP. Details of how they carry out their obligations in relation to personal data can be found at their website: <https://www.squirepattonboggs.com/en>

data to ensure that appropriate organisational and technical controls are in place for the duration of the data lifecycle.

6. Ensuring that, where applicable, personal data is anonymised and/or pseudonymised appropriately with sufficient measures to mitigate risks of later re-identification and harm to data subjects upon further processing.
7. Providing training and guidance to the Scheme's administration staff in respect of their data protection responsibilities.
8. Ensuring privacy policies are in place to support the Scheme's members, notably in respect of ensuring personal data accuracy and quality, minimised data retention and adequate security policies.
9. Implementing a data breach reporting management and data subject request process.
10. Ensuring that personal data is only shared where the Trustees are satisfied that third party recipients are legally entitled to further process it pursuant to appropriate data sharing agreements.
11. Only working with companies for data processing services that are data protection compliant and which enter into appropriate data processing agreements.
12. Ensuring that appropriate protection is in place for cross-border transfers of personal data, pursuant to suitable data sharing and security agreements, when the Trustees work with trusted organisations inside and outside the European Economic Area (EEA).

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