

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

## Privacy Notice

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### Introduction

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 and the Scheme's Actuary and Legal Advisors are the data controllers. Our registration number with the Information Commissioner's Office is ZA222851.

We collect and process personal data relating to PASNAS members to manage and administer pension benefits from the Scheme. We are committed to being transparent about how we collect and use that data and to meet our data protection obligations. We recognise the need to treat it in an appropriate manner in accordance with the General Data Protection Regulation (GDPR), from 25 May 2018, as we have under the Data Protection Act 1998 (DPA) prior to that date. The purpose of this notice is to make you aware of how we will handle your personal data.

Data refers to the information that we hold about you from which either on its own or in combination with other information you can be identified and may include names, contact details, information about your pay, and photographs. A list of the data we collect is set out below.

"Processing" means doing anything with your data, such as collecting, recording or holding the data as well as disclosing, destroying or using the data in any way.

We will be processing your data under the current Data Protection Act 1998 (DPA) until 24 May 2018 and then under the General Data Protection Regulations (GDPR) from 25 May 2018.

### What information does the Scheme collect?

We collect and processes a range of information about you. This may include:

- Your name, address and contact details, including email address and telephone number, date of birth and gender
- The terms and conditions of your employment
- Details of your employment history, including start and end dates, with your employer
- Information about your remuneration
- Information about your membership and benefits from other pension schemes
- Details of your bank account, passport and national insurance number

- Information about your marital status, next of kin and dependants<sup>1</sup>
- Details of your schedule (days of work and working hours) and attendance at work
- Details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave
- Information about medical or health conditions

We may collect this information in a variety of ways. For example, data might be obtained from your passport, from forms completed by you during your employment with the University (such as benefit nomination forms), from correspondence with you, or through meetings with you.

Data will be stored in a range of different places, including in your personnel file, in the University's Pension, Payroll and HR systems.

## **Why does the Scheme process personal data?**

We will be processing your data to fulfil our obligations of your PASNAS membership under the Trust Deed and Rules. This includes any steps taken at your request during your membership.

We need to process data to meet our obligations under membership to PASNAS. For example, we need to process your data to provide you with an annual benefit statement and to administer pension and insurance benefits.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to deduct tax from pensions in payment and to provide your personal data to HM Revenue and Customs.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows us to:

- Maintain accurate and up-to-date pension membership records and contact details
- Operate and keep a record of absence to ensure that members receive the correct benefits to which they are entitled
- Operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave) to ensure that members receive the correct benefits to which they are entitled
- Obtain medical assessments and advice about members, to ensure we comply with our duties in relation to ill-health retirements
- Ensure effective general pension administration
- Provide transfer values for current or former members
- Respond to and defend against complaints, appeals or legal claims.

Sometimes, we may obtain data in special categories that are particularly sensitive. This can include health information, for example. In circumstances where we need to process data in special categories, we will usually only do this having obtained your consent to do so. Where we do process data with your consent, you will have the right to withdraw your consent to the processing (you may

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<sup>1</sup> Where you have provided us with personal data about other individuals, such as family members, please make them aware of the information contained in this Notice.

do so by written notice to the Trustees). Please note, though, that if you don't provide consent to processing special category data where needed, or if you subsequently withdraw your consent, this may restrict the Trustees from processing or making decisions based on relevant data, which could include decisions on the payment of your benefits.

## Where we get it from

We will obtain your data either directly from you or from third party sources, such as a previous pension provider you have advised us of. We will always look to ensure that any third party has the lawful authority to share this data with us.

## Processing for limited purposes

We will only process your data for the specific purpose or purposes that we tell you or if specifically permitted under any privacy legislation and will only process your data to the extent necessary for that specific purpose or purposes.

## Accurate data

We will keep the data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed.

Current University employees can view and change some of their personal data through self-service MyHR. All members can request details of the data we store about them by contacting [pensions@soton.ac.uk](mailto:pensions@soton.ac.uk).

Please let us know if your details change or if you feel that the data we hold about you is inaccurate by contacting [pensions@soton.ac.uk](mailto:pensions@soton.ac.uk).

## Data security

Our pension administration staff have a legal duty to keep data about you confidential. There are strict codes of conduct in place to keep your data safe. Staff abide by the Data Protection Act 1998 and from 25th May 2018 will abide by the General Data Protection Regulation (GDPR).

We endeavour to ensure that suitable organisational and technical measures are in place to prevent the unlawful or unauthorised processing of your data and against the accidental loss of or damage to your data. This includes:

- Storing data on an appropriately secure system.
- Training all our administration staff in their data protection responsibilities.
- Working with reputable companies for data processing services who are data protection compliant and who enter into appropriate data sharing agreements.
- Ensuring that appropriate protection is in place when we work with trusted organisations based outside the European Economic Area (EEA).

## Sharing your data

Your data will be shared with our advisers and service providers, so they can help the Trustees of PASNAS carry out their duties. These include the following:

- The University's Payroll team to ensure correct pension contributions are deducted from your pay or to ensure the correct retirement benefits are paid to you
- HMRC to comply with legislation on pay and benefits
- The Scheme's life assurance provider to maintain your Death in Service benefit cover
- Senior University staff in order for them to investigate a complaint from you against the Scheme
- The Scheme's legal advisors in the event of a complaint, appeal or legal claim from you against the Scheme<sup>2</sup>
- The Scheme's Actuary to calculate transfer benefits if you leave PASNAS, retirement benefits when you retire and to ensure accurate valuations of the Scheme<sup>3</sup>
- External pension providers if you decide to transfer your benefits on leaving the Scheme.

We may have to disclose your data if required to do so by law in order to comply with a legal obligation, to protect our rights, interests or property and those of others, act in urgent circumstances to protect the personal safety of our staff, students and the public or to protect us against any legal liability.

## Holding and retaining your data

We create and hold your data both electronically and on paper. We will only hold your data as long as is necessary for the purpose or purposes that we have collected it, or to comply with our legal and regulatory obligations.

## How do I access my data?

If you would like to access your data please make a request in writing to:

The Pensions Team  
 Room 3083, Building 37  
 University of Southampton  
 Highfield  
 Southampton, SO17 1BJ  
 Email: [pensions@soton.ac.uk](mailto:pensions@soton.ac.uk)

## Further information

We also have additional information on the PASNAS website about how we protect your data. Please visit: <https://www.southampton.ac.uk/finance/services/pasnas.page> (current University employees) or <https://www.southampton.ac.uk/finance/services/index.page> (former employees and pensioners)

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<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>

<sup>3</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/>

If you are unhappy with the way that we have handled your data you can contact us at: [pensions@soton.ac.uk](mailto:pensions@soton.ac.uk) or contact the Information Commissioner's Office. See their website at: <https://ico.org.uk/>.