

Fair Processing Notice

OSPS is the pension scheme for support staff of the University or of the Associated Employers participating in the Scheme. OSPS Trustee Limited is the sole Trustee of the Scheme.

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

The data controller in respect of the personal data you submit to us either directly or via your employer, is the Trustee of the University of Oxford Staff Pension Scheme (the '**Scheme**') who you can contact via the Pensions Officer at osps@admin.ox.ac.uk. We use your personal data that is provided to us to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

We will only collect personal data from you directly or from your employer. Queries regarding personal data that your employer provides to us should be directed to your employer via your usual process.

We process the personal data that you provide to us or which is provided via your employer for the purpose of administering the Scheme. Such personal data may include (but is not limited to):

- identity data, such as first name, last name, maiden name, marital status, data of birth, national insurance number and gender;
- contact data, such as postal address, email address, telephone number;
- financial data, such as bank account details, past activity relating to the Scheme, information relating to contributions or benefits under the Scheme, your status as a Scheme member, and
- information relating to your tax band;
- data relating to communication preferences.

We process the personal data that is provided to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants benefits. We therefore process your personal data on the legal basis that either the processing is necessary:

- for the performance of the contract of employment between you and your employer regarding your participation in the Scheme;
- to comply with our legal obligations; or
- for our legitimate interests as Trustee of the Scheme to effectively operate, administer and audit the Scheme; prevent fraud; keep our records up to date and any other legitimate interests that we may identify, provided always that your interests and fundamental rights do not override those interests.

If you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it.

We will transfer your data to your employer, other participating employers in the Scheme and their advisers, the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. Some of the Scheme's advisers, in particular the Scheme actuary, Scheme's legal adviser, and the Scheme auditor will be data controllers in their own right in respect of the data we share with them. If you would like further details of those advisers and how they use your personal data, please contact the Trustee via the contact details at the bottom of this notice.

We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that your employer sells its business or assets (in which case we may disclose your personal data to the prospective buyer), in the event that we decide to de-risk or insure or transfer out any of the benefits provided by the Scheme (in which case we may disclose your personal

data to the prospective insurer or replacement scheme) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustees, the members of the Scheme, or others. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

When you near retirement and if you change address during retirement we will seek your consent (via the relevant form) to process your personal data (including by disclosing your information to third parties) for the purposes of the Pensioners' Welfare Officer visiting Scheme pensioners in Oxfordshire and in connection with membership of the Association of Oxford University Pensioners. If you provide your consent for either or both of these purposes, you are entitled to withdraw it at any time by contacting the Pensions Officer at osps@admin.ox.ac.uk. You can find out more about these services on our website <https://finance.admin.ox.ac.uk/osps-pensioners>

Your personal data will be processed in the United Kingdom. The Trustee does not currently transfer data for processing outside of the United Kingdom.

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data. As a general rule, your personal data will be retained for as long as the Scheme continues and for 12 years following its winding-up.

Data Protection legislation gives you the right to access information held about you. Where we or third parties are required by law to obtain your consent to the processing of your personal data you are entitled to withdraw your consent. If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds. However, some data, for example data in relation to your health or personal life, is regarded as 'special categories of personal data' and cannot be used without an additional legal basis for doing so, such as your explicit consent. As the administrator of an occupational pension scheme, we have to process that special category data to perform our obligations under employment law and the law relating to social protection e.g. in relation to the award of benefits on death or ill-health. We understand this is a valid legal basis for processing special category data and we will not require your specific consent to process that data. To the extent that is not the case, we will ask for your consent to process 'special categories of personal data' but you should be aware that without that consent, we may be unable to administer your pension which may result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

You have certain rights in relation to your personal data, although those rights will not necessarily apply in all cases or to all personal data that is processed by us. For example, certain rights will not apply where we need to process personal data to comply with our legal duties as Trustees. You have the right to request that we:

- provide you with a copy of any personal data that we hold about you;
- update any of your personal data that is out of date or incorrect;
- delete any personal data that we hold about you;
- restrict the way that we process your personal data;
- consider any valid objections that you have to our use of your personal data; or
- provide your personal data to a third-party provider of services.

Please contact the Pensions Officer at osps@admin.ox.ac.uk. We will consider all such requests (including whether they apply in a particular case) and provide our response within the time period required by applicable law. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity. Please note that if you ask us to erase your personal data and we do not have a legal justification for retaining that data, we will be unable to administer your



University of Oxford Staff Pension Scheme (OSPS)

pension which will result in you and/or your spouse and dependants not receiving the pension and death benefits provided by the Scheme.

If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office (ICO). You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Contact details

If you have any questions or comments on this notice, or concerns about the way we handle your personal data, you can contact us via email osps@admin.ox.ac.uk or write to us at:

Pensions Office
Finance Division
23-38 Hythe Bridge Street
Oxford
OX1 2ET

Aon Solutions UK Limited (Aon)

More details about the Scheme's pension consultancy service provider (Aon) and the Scheme Actuary's use of your personal information is set out in their Privacy Notice. You can review this notice which is available online, or you can request a copy by contacting Aon, including reference to the Scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH or via email to RI.UK.PrivacyChampions@aon.com

Legal and General Group plc

More information about the DC Scheme provider can be found within their Privacy Notice. This is available online, or you can request a copy by contacting Legal & General, including reference to the Scheme name, at Liz Gaspar, Data Protection Officer, Legal & General, 1 Coleman Street, London, EC2R 5AA.

Prudential Assurance Company Limited

More information about the AVC provider can be found within their privacy notice which is available online.

The Tracing Group

With your consent, we will collect biometric data from you in the form of an image of your face which we will use to verify your identity and the authenticity of any identification documents, such as your passport, which you provide to us at our request. We may use a third-party data processor called The Tracing Group to perform this verification for us. You may withdraw your consent at any time by contacting us. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

More information about the Tracing Group services the Trustee uses to validate and verify member data can be found in their Privacy Notice <https://www.thetracinggroup.co.uk/ethics-and-standards>.

Department of Work and Pensions (DWP)

The Trustee also uses the DWP tracing service to verify member data as and when required. More information about their data policy can be found online.