

PRIVACY NOTICE OF THE TRUSTEES OF THE REPRESENTATIVE BODY OF THE CHURCH IN WALES STAFF RETIREMENT BENEFIT SCHEME

WHAT'S INCLUDED IN THIS PRIVACY NOTICE?

The Trustees of the Representative Body of the Church in Wales Staff Retirement Benefit Scheme (the "Scheme") and responsible for running the Scheme are: Mr HE Wardle, Mr JP Richfield, Mrs KA Phillips and Mrs J Heard (the "Trustees"). Ms Carol Cole of Atkin Trustees Ltd is the Scheme Actuary to the Scheme.

This document (our "privacy notice") sets out information relating to how we use personal information relating to individuals in running the Scheme. It also sets out information about what rights individuals have in relation to their personal information and various other matters required under data protection law.

In particular, this privacy notice provides information to individuals about how they can object to our use of their personal information and how they can withdraw any permissions they have given to us to enable us to process their personal information and how they can make a complaint.

This privacy notice contains the following sections:

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WHO DOES THIS PRIVACY NOTICE APPLY TO?

This privacy notice applies to Members of the Scheme, their spouses or civil partners and beneficiaries of the Scheme.

In the sections below, when referring to the individuals listed above, we use the terms “you” or “your”.

WHAT'S OUR APPROACH TO PRIVACY?

We take your privacy extremely seriously and want you to feel confident that your personal information is safe in our hands.

We will only use your personal information in accordance with data protection law applicable to England and Wales from time to time.

Under data protection law, when we use your personal information, we will be acting as a data controller. Essentially, this means that we will be making decisions about how we want to use your personal information and why. The Scheme Actuary, Ms Carol Cole of Atkin Trustees Ltd is also a data controller.

Below, we summarise the main rules that apply to us under data protection law when we use your personal information:

1.	We must be upfront about how we intend to use your personal information and must use your personal information fairly. Providing privacy information to individuals (such as in this privacy notice) is one aspect of using personal information fairly.
2.	We must only use your personal information if we have a legal basis to do so under data protection law. These legal bases include: <ul style="list-style-type: none">• That you have consented to our use of your personal information;• That we need to use your personal information to perform a contract between us (or to take steps at your request prior to entering into a contract);• That we (or someone else) needs to have access to your personal information and those legitimate interests are not outweighed by your rights or interests. We must balance our respective rights and interests before we can rely upon this legal basis; and• We need to use your personal information to comply with laws we are subject to.
3.	We must only use certain types of sensitive personal information (such as information relating to your health) if we can also satisfy one of the conditions for processing this type of information set out in data protection law. These conditions include: <ul style="list-style-type: none">• That you have given us your explicit consent to use the information.
4.	We are only permitted to share your personal information with others in certain circumstances and if we take steps to ensure that your personal information will be secure.
5.	Generally speaking, we must only use your personal information for the specific purposes we have told you about. If we want to use your personal information for other purposes, we need to contact you again to tell you about this.

6.	We must not hold more personal information than we need for the purposes we have told you about and must not retain your personal information for longer than is necessary for those purposes (this is known as the “retention period”). We must also dispose of any information that we no longer need securely.
7.	We must ensure that we have appropriate security measures in place to protect your personal information.
8.	We must act in accordance with your rights under data protection law.
9.	We must not transfer your personal information outside the UK unless certain safeguards are in place. One such safeguard is that the personal data is only transferred to a country that has been approved by the UK Government as having an acceptable level of data protection law.

HOW WILL WE USE YOUR PERSONAL INFORMATION?

How we will use your personal information, the legal bases we will rely upon, how long we will keep your personal information and other details will depend upon who you are and why we need your personal information in the first place.

In this section, we provide specific privacy information relating to the different categories of individuals that this privacy notice applies to.

PENSION SCHEME MEMBERS

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
your name, address and contact details your gender your age and date of birth your National Insurance number and tax code your spouse/civil partner and beneficiary details your bank account details your employment history and dates of employment your salary and benefit details and details of any investments of pension	<p>Legal Obligation</p> <p>Our use of your personal information will be on the basis that the processing is necessary to comply with our legal obligation to run the Scheme appropriately in accordance with the Trust Deed and Pension Scheme Rules.</p> <p>Special Category Data</p> <p>Our use of your health data will be on the basis of your explicit consent.</p> <p>If and to the Extent any personal data we process reveals your religious beliefs, our processing of that Special Category data is carried out with your explicit consent,</p>	<p>The trustees are required to administer your pension which is 7 years after death or from the time we no longer administer your pension.</p> <p>Atkin Trustees Ltd as administrators will retain data for 7 years after the Scheme has been wound up.</p>	<p>Your Personal Data is provided to us by you or by your employer.</p> <p>We will use your name, address and other contact details to communicate with you about information relevant to the Scheme and for general administration of the Scheme.</p> <p>We will use your bank account details to make payments to you.</p> <p>We will use your employment history and dates of employment, salary and benefit details, national insurance number and details of any investments of</p>	<p>Without provision of your personal information you will not be able to become a member of the Pension Scheme nor receive payment of any pension benefits.</p>

<p>Scheme assets which may affect the taxation of your pension</p> <p>your health data</p>			<p>the Scheme assets which may affect the taxation of your pension to ensure that correct pension payments are made to you.</p> <p>We will use details of your spouse, civil partner and/or beneficiary to make pension payments in circumstances where they receive payments from your Pension.</p> <p>We will use your health data to decide upon the benefits payable to you for example in the case of an ill-health retirement.</p>	
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SPOUSE/CIVIL PARTNER AND BENEFICIARIES

Personal Data	Lawful Base(s)	Retention Period	Source of Data Use of Data & Data Sharing	Consequences of not Providing Your Data
<p>your name, address and contact details</p> <p>your gender</p> <p>your age and date of birth</p> <p>your National</p>	<p>Legal Obligation</p> <p>Our use of your personal information will be on the basis that the processing is necessary to comply with our legal obligation to run the Scheme appropriately in accordance with</p>	<p>The trustees are required to administer your pension which is 7 years after death or from the time we no longer administer your pension.</p>	<p>Your Personal Data is provided by the Pension Scheme member.</p> <p>We will use your name, address and other contact details to communicate</p>	<p>Without provision of your personal information you will not be able to receive payment of any Pension Scheme benefits.</p>

Insurance number and tax code your bank account details	the Trust Deed and Pension Scheme Rules.	Atkin Trustees Ltd as administrators will retain data for 7 years after the Scheme has been wound up.	with you about information relevant to the Scheme and for general administration of the Scheme. We will use your bank account details to make payments to you.	
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WHEN WILL WE SHARE YOUR PERSONAL INFORMATION WITH OTHERS?

Sometimes, we will need to share your personal information with others. This section sets out details of who we will share your personal information with and why. It also tells you about our legal basis for doing so under data protection law and steps we will take to protect your personal information.

We will never sell your personal information on to third parties.

THOSE WHO ASSIST US WITH MANAGING THE PENSION SCHEME

Who assists us with managing the Scheme?	The Scheme Administrators, and The Scheme Actuaries, namely Atkin Trustees Ltd
Why we need to share your personal information with them	We use the organisations described above to assist us in running the Scheme appropriately in accordance with the Trust Deed and Pension Scheme Rules.
The legal ground we rely upon	The sharing of your personal data with those who assist us in managing the Pension Scheme is in pursuance of the Contract between us this enables us to efficiently run the Scheme and obtain advice and assistance on managing the Scheme to your benefit.

YOUR EMPLOYER

Why we need to share your personal information	We may need to share information about your Pension Scheme benefits, incentives and entitlement with your employer.
The legal ground we rely upon	The sharing of this information is in pursuance of the Contract between us as it allows us to effectively manage the

	Scheme and to ensure that you receive information about benefits and incentives which are applicable to you. Communicating this information via your employer ensures that you have additional points of contact in respect of which to discuss your pension options.
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OTHER THIRD PARTIES

We may also need to share your personal information with others in the following circumstances:

Legal or regulatory requirements	On occasion, we may be required to disclose your personal information to organisations such as the courts or the police to comply with legal obligations we are subject to and/or to prevent fraud or crime.
Professional advice and legal action	We may need to disclose your personal information to our professional advisers (for example, our lawyers and accountants) in connection with the provision by them of professional advice and/or the establishment or defence of legal claims.

CIRCUMSTANCES IN WHICH WE WILL SEND YOUR PERSONAL INFORMATION OUTSIDE THE UK

We do not envisage that we will need to send your personal information outside the UK. If the need arises, we will inform you in advance and will use one of these safeguards to make sure it is protected:

- We will only transfer it to a Country outside of the UK which the UK Government has decided has an adequate level of protection for personal data. or
- We will put a written contract in place between us and the recipient that incorporates UK-GDPR model clauses relating to the transfer of personal data outside of the UK. or
- We will seek your specific consent to do so.

WHAT RIGHTS DO YOU HAVE UNDER DATA PROTECTION LAW?

Under data protection law, you have a number of different rights relating to the use of your personal information. The table below contains a summary of those rights and our obligations. More information about your rights and our obligations can be found on the ICO website <https://ico.org.uk/>.

Your rights

You have the following rights regarding your personal data:

Your rights	What this involves	What our obligations are
A right to be Informed	This is the right to know if we are processing information about you.	Subject to certain exemptions, we must respond to any requests you make to know if we are processing your data.
A right of access	This is a right to obtain access to your personal data and various supplementary information.	We must provide you with a copy of your Personal Data and the other supplementary information without undue delay and in any event within one month of receipt of your request; We cannot charge you for doing so save in specific circumstances (such as where you request further copies of your Personal Data).
A right to have personal data rectified	This is a right to have your Personal Data rectified if it is inaccurate or incomplete.	We must rectify any inaccurate or incomplete information without undue delay and in any event within 1 month of receipt of your request; If we have disclosed your Personal Data to others, we must (subject to certain exceptions) contact the recipients to inform them, that your Personal Data requires rectification.
A right to erasure	This is a right to have your Personal Data deleted or removed. This right only applies in certain circumstances (such as where we no longer need the Personal Data for the purposes for which it was collected). We have the right to refuse to delete or remove your personal data in certain circumstances.	If this right applies, we must delete or remove your Personal Data without undue delay and in any event within one month of receipt of your request; If we have disclosed your Personal Data to others, we must (subject to certain exceptions) contact then recipients to inform them that your Personal Data must be erased.
A right to data portability	This is a right to obtain and re-use your Personal Data for your own purposes; It includes a right to ask that your Personal Data	If this right applies we must provide your Personal Data to you in a structured, commonly used and machine reasonable form

	<p>is transferred to another organisation (where technically feasible). This right only applies in certain limited circumstances. Following a request relating to Data Portability we will transmit the relevant personal data to the data subject or their nominated data controller where it is possible and technically feasible for us to do so.</p>	<p>Again, we must act without undue delay and in any event within 1 month of receipt of your request; We cannot charge you for this service.</p>
A right to object	<p>This is a right to object to the use of your Personal Data. The right applies in certain specific circumstances only. You can use this right to challenge our use of your Personal Data based on our legitimate interests; You can also use this right to object to use of your Personal Data for direct marketing</p>	<p>If you object to us using your Personal Data for direct marketing, we must stop using your Personal Data in this way as soon as we receive your request. If you object to other uses of your Personal Data, whether we have to stop using your Personal Data will depend on the particular circumstances.</p>
A right to object to automated decision making	<p>This is a right not to be subject to a decision which is made solely on the basis of automated processing of your Personal Data where the decision in question will have a legal impact on you or a similarly significant effect. We may use Automated decision making about you if it is necessary for entering into or performing a Contract with you or where you Consent to the actions.</p>	<p>Where such a decision is made, you must be informed of that fact as soon as reasonably practicable;</p> <p>You then have 21 days from receipt of the notification to request that the decision is reconsidered or that a decision is made that is not based solely on automated processing;</p> <p>Your request must be complied with within 21 days.</p>
A right to restrict processing	<p>This is a right to 'block' or suppress processing of your Personal Data. This right applies in various circumstances</p>	<p>If we are required to restrict our processing of your Personal Data we will be able to store it but not otherwise use it.</p>

	including where you contest the accuracy of your information).	<p>We may only retain enough information about you to ensure that the restriction is respected in future.</p> <p>If we have disclosed your Personal Data to others, we must (subject to certain exceptions) contact them to tell them about the restriction on use.</p>
<p>Legitimate Interests</p> <p><i>Data from sources other than the Data Subject.</i></p>	<p>If the processing is based on Legitimate Interests, you are entitled to know what and whose Legitimate Interests they are. This lawful basis is used only after conducting a three part test to ensure the data subjects rights are properly protected. If we process data about you but we have not obtained the data personally from you, we must provide you with the information described in this Privacy Notice and some additional information. You are entitled to know the source of the information and whether the source is publicly accessible.</p>	<p>There are some exceptions to the additional information rule. If we obtain your Personal Data from a source other than yourself, the additional information rules will apply unless:-</p> <p>You already have the information regarding our processing; or</p> <p>it would take a disproportionate effort or be impossible to provide you with it; or</p> <p>you are already legally protected under separate provisions; or</p> <p>we have a legal duty not to disclose it.</p>

If you wish to exercise any of your rights, you can make a request by contacting:

- Ms Louise Davies Secretary to the Trustees of the Representative Body of the Church in Wales Staff Pension Scheme, 4th Floor, 2 Callaghan Square, Cardiff CF10 5BT email: ledavies@churchinwales.org.uk

or

- Administration Team on behalf of the Actuaries and Administrators Atkin Trustees Ltd, Cornwall House Blythe Gate Blythe Valley Park Solihull, B90 8AF email email@atkin.uk.com

If you request the exercise of any of your rights we are entitled to ask you to provide us with any information that may be necessary to confirm your identity.

YOUR RIGHT TO WITHDRAW CONSENT

If you have given us your consent to use any of your personal information, you can withdraw your consent at any time. To do so, please contact the trustees:

Ms Louise Davies Secretary to the Trustees of the Representative Body of the Church in Wales Staff Pension Scheme, 4th Floor, 2 Callaghan Square, Cardiff CF10 5BT

or for the Scheme actuaries and administrators please contact:

Administration Team on behalf of the Actuaries and Administrators Atkin Trustees Ltd, Cornwall House Blythe Gate Blythe Valley Park Solihull, B90 8AF email@atkin.uk.com

HOW CAN YOU GET IN TOUCH WITH US AND WHO OVERSEES OUR COMPLIANCE WITH DATA PROTECTION LAW

You can get in touch with us in the following ways:

Trustees of the Representative Body Staff Pension Scheme

Postal address	4 th Floor Callaghan Square Cardiff CF10 5BT
Email address	ledavies@churchinwales.org.uk
Phone number	02920348217

Actuaries and Administrators Atkin Trustees Ltd

Postal address	Cornwall House Blythe Gate Blythe Valley Park Solihull, B90 8AF
Email address	email@atkin.uk.com
Phone number	0121 506 8200

The Trustees have appointed a Data Protection Officer (DPO) within the Representative Body of the Church in Wales to oversee our compliance with data protection law and this privacy notice whose contact details are dataprotection@churchinwales.org.uk.

The actuaries and administrator have appointed Ms Carol Cole, Atkin Trustees Ltd, Cornwall House Blythe Gate Blythe Valley Park Solihull, B90 8AF to oversee our compliance with data protection law and this privacy notice.

If you have any questions about this privacy notice, how we handle your personal information or if you wish to make a complaint, please contact Ms Louise Davies ledavies@churchinwales.org.uk or Ms Carol Cole whose contacts are above.

RIGHT TO COMPLAIN TO THE INFORMATION COMMISSIONER'S OFFICER

If we are unable to deal with a complaint to your satisfaction or if you are unhappy with the way we are using your personal data, you also have the right to make a complaint at any time to the UK's supervisory authority for data protection issues, the Information Commissioner's Office.

CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice from time to time. If we make any substantial updates, we will provide you with a new privacy notice. We may also notify you in other ways from time to time about the processing of your personal information.