



PRUDENTIAL
Staff Pension Scheme

The Defined Contribution Section

Your journey

Keeping your personal data safe



Introduction

Dear Member

The Trustee holds personal data about you, your beneficiaries/ Dependants and your fellow members of the Prudential Staff Pension Scheme (the Scheme). It also shares this information with the advisers that support the Trustee in running the Scheme. It must do this to be able to effectively manage the Scheme and ultimately pay the right benefits to the right people at the right time. As a result the Trustee has a responsibility to keep this information secure, something it is committed to achieving on an ongoing basis.

As a result of changes to the legislation surrounding the collection and use of personal data, which come into effect from 25 May 2018, the Trustee has reviewed its policy regarding the storing of members' personal data. On the next few pages of this booklet you will find the Trustee's updated Data Privacy Statement. This is also available on the Scheme website

www.prudentialstaffps.co.uk.

As part of the Trustee's review of its data security policy, each of the Trustee's advisers has provided comprehensive information on their own data security policies. This information has been reviewed by a specialist data security company to ensure that your data is safe. A list of the Trustee's advisers can be found on the Scheme website

www.prudentialstaffps.co.uk.

It is important that the information the Trustee holds about you is correct. You can see some of this information in

My account, the secure area of the Scheme website. I would encourage you to login and review your data if you have not already accessed this area. If you have lost or forgotten your login details please call the Administration Team whose contact details can be found on the final page of this booklet.

I hope you find this booklet useful and take comfort in how important the Trustee takes the matter of your privacy and the need to keep your data safe. If you have any questions about the protection of your data please write to me, my address is on the final page of this booklet.

Yours faithfully



A handwritten signature in black ink that reads "Marion Steel".

Marion Steel
**Pensions Manager
Prudential Staff
Pension Scheme**

Data Privacy Statement

TRUSTEE'S COMMITMENT TO YOUR PRIVACY

The Trustee of the Prudential Staff Pension Scheme is committed to protecting and respecting your privacy and rights. This Privacy Statement (Statement) gives you information about the Trustee, how the Trustee will collect and use personal data about you, the circumstances in which the Trustee may share or otherwise use the personal data and to whom the Trustee may disclose this personal data.

The Trustee is the data controller in respect of the personal data that is collected about you for the purposes of data protection legislation (by which we mean the current UK Data Protection Act 1998 and the EU General Data Protection Regulation (EU Regulation 2016/679) (GDPR) which comes into effect on 25 May 2018).

The Trustee's address is:

**Prudential Staff Pension Scheme
3 Sheldon Square
London
W2 6PR**

INFORMATION THE TRUSTEE MAY COLLECT FROM YOU

The Trustee may collect and process personal data which you provide in connection with the Scheme. This may include data about your age, date of birth, gender and marital status. Also included may be your length of employment

with the Company and details of your Dependants and other persons in your household, and your contact details (e.g. residential address, email address and telephone number).

In addition, the Trustee may collect, hold and use the following categories of personal data about you that are of a sensitive nature (Sensitive Personal Data):

- › Racial or ethnic origin;
- › Physical or mental health or condition or sexual orientation;
- › Religious or similar beliefs;
- › The commission or alleged commission by you of any offence; or
- › Any proceedings for any offence committed or alleged to have been committed by you and the disposal of such proceedings or the sentence of any court in such proceedings.

INFORMATION THE TRUSTEE MAY COLLECT ABOUT YOU FROM THE COMPANY OR THIRD PARTIES

The Trustee may collect personal data about you from the Company or third parties. This may include information relating to your employment, your salary and your benefits, to the extent relevant to your pension and related arrangements. Periodically, the Trustee may collect personal data relating to you from third parties such as former employers or regulatory authorities.

PURPOSES FOR WHICH AND THE BASIS UPON WHICH THE TRUSTEE WILL PROCESS YOUR PERSONAL DATA

The Trustee will process your personal data and the personal data of other persons (e.g. your Dependants) provided by you to the Trustee in connection with the administration of your Personal Account and related benefit entitlements arising as a result of your employment with the Company.

Generally, the Trustee will rely upon the "legitimate interests" ground as the legal basis for processing your personal data. This means that the Trustee will process personal data for the legitimate interests of itself or a third party to whom the Trustee may disclose personal data in accordance with this Statement. The legitimate interests being the administration of the Scheme (provided always that the legitimate interests are not overridden by the interests or fundamental rights or freedoms of Scheme members (or others) which may require the protection of personal data).

Where the Trustee is required to process Sensitive Personal Data they will approach you or the relevant individuals for specific consent to the processing of such data.

RETENTION OF PERSONAL DATA

The Trustee will hold personal data of Scheme members and their Dependants for as long as may be necessary in order to fulfil the purposes for which it was collected.

For example:

- › The Trustee may indirectly learn about your racial or ethnic origin from documents you submit to prove your identity. Documentation to prove your identity will be stored until such time as the Trustee can confirm that no further liabilities are payable from the Scheme as a result of your membership;
- › The Trustee may indirectly learn about your personal life from the Dependants you advise on an Expression of Wish Form. Only the current Form is kept and again this will be stored until such time as the Trustee can confirm that no further liabilities are payable from the Scheme as a result of your membership; and
- › For deferred members only: The Trustee may request details of your medical history to support an application for early payment of pension on the grounds of ill health. This information will be confidentially destroyed once the Scheme's Medical Adviser has confirmed if you are eligible for early retirement on the grounds of ill health.

Personal data is collected to administer benefit entitlements and for the purposes of maintaining records of steps the Trustee has taken to comply with its obligations under the Scheme. Inevitably, this means that personal data may be retained by the Trustee for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased.

Should you require details of the retention periods for the different aspects of your personal data please contact the Pensions Manager, at the address shown at the back of this booklet.

In determining the appropriate retention period, the Trustee will take into consideration statutory requirements and industry guidelines, nature and sensitivity of the personal data, the purposes for which it was collected, how the data is stored and the potential risk from unauthorised use or disclosure of personal data.

DISCLOSURE OF PERSONAL DATA

In the course of administering the Scheme, the Trustee will use the services of the Scheme's Administrator, Legal, Actuarial, Communications, Medical Advisers, the Auditor, tracing agencies and other similar external advisors.

The Trustee may disclose your personal data to these third parties in connection with services provided by the third parties to the Trustee. The Trustee may also share some of your personal data with the Company. At all times, the Trustee will ensure that the personal data is processed in accordance with its instructions and in circumstances which require the recipient to observe industry standard security measures in respect of the personal data.

The Trustee may also disclose your personal information to third parties if the Trustee is under a duty to disclose or share your personal data in order to comply with any legal obligation.

The Scheme's advisers hold and process your personal data when providing services to the Scheme. A list of these advisers and links to their Privacy Statements can be found on the Scheme's website or obtained by writing to the Pensions Manager.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

As required by data protection legislation, the Trustee has strict security procedures regarding the storage and disclosure of personal data. The personal data that is collected about you may be transferred to, and stored at, or processed in one or more countries outside the European Economic Area (EEA) which has not yet been deemed by the European Commission to offer adequate data protection. It may also be processed by staff operating outside the EEA who work for the Trustee or for the Trustee's third parties. In such cases, the Trustee will take steps to ensure an adequate level of data protection in the country of the recipient as required under GDPR and as described above under retention of personal data. We may safeguard such transfers through the use of Standard Contractual Clauses as approved by the European Commission. If you wish to obtain a copy of these Standard Contractual Clauses, please contact the Pensions Manager, at the address shown at the back of this booklet.

If there were circumstances where the Trustee could not ensure such an adequate level of data protection, your personal data will not be transferred outside the EEA.

AUTOMATED DECISION MAKING

The Trustee does not envisage that any decisions will take place about using your personal data using automated means. In the event that this position changes, the Trustee will notify you in writing.

YOUR RIGHTS

You have rights under the GDPR including:

- › The right to access your personal data;
- › The right to have your personal data rectified if it is inaccurate or incomplete;
- › The right to have your personal data deleted or removed if there is no reason for its continued storage and processing;
- › The right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances;
- › The right to request the transfer of your personal data to another party; and
- › Where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent.

Any such requests should be sent to the Pensions Manager, at the address shown at the back of this booklet.

CHANGES TO THIS STATEMENT

The Trustee reserves the right to change this Statement and any other relevant policies or procedures at any time without notice to you. Any changes the Trustee may make to this Statement in the future will be notified to you and posted on the Scheme's website www.prudentialstaffps.co.uk and you are advised to regularly check and review the Statement to ensure you understand how the Trustee may be processing your personal data. Any changes the Trustee may make to this Statement (which will, unless otherwise indicated, apply to any personal data already obtained by the Trustee before the changes were made) will be effective from the date on which those changes have been notified to you or posted on the Scheme's website. Where appropriate, the Trustee may also notify you of any changes by email.

A copy of the Scheme's current Data Privacy Statement will always be available on the Scheme's website www.prudentialstaffps.co.uk.

DEFINITIONS USED IN THIS STATEMENT

The **Trustee** of the Prudential Staff Pension Scheme is Prudential Staff Pensions Limited.

Company means The Prudential Assurance Company Limited or any associated company whose ultimate owner is Prudential plc.

Contact

If you have any questions concerning this Statement or the policies or procedures referred to in this booklet, please contact the Pensions Manager, at the address below.

Write to: Prudential Staff Pension Scheme
3 Sheldon Square
London
W2 6PR

If you are dissatisfied with any aspect of the Scheme's handling of your personal data you have a right to lodge a complaint with the Information Commissioner's Office. Their contact details are:

Email: casework@ico.org.uk
Phone: 0303 123 1113 or 01625 545 745
Fax: 01625 524 510
Write to: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF



My account

To check what personal information the Trustee holds about **you**, visit the secure area of the Scheme website.

For general enquiries, including matters relating to accessing My account, the secure area of the Scheme website, please contact the Administration Team:

Email: PPSDC.SC@prudential.co.uk
Phone: 0345 300 2637
Help is available Monday to Friday 9am to 5pm
Post: Prudential (PSPS DC)
121 Kings Road
(Ground Floor C)
Reading
RG1 3ES

www.prudentialstaffps.co.uk



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