



PRUDENTIAL

Staff Pension Scheme

Defined Contribution Section

# Keeping your personal data safe



*Your journey*

# Introduction

## Dear Member

The Trustee holds personal data about you, your beneficiaries/Dependants and your fellow members of 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 recent guidance from the UK Information Commissioner, the Trustee has reviewed its policy regarding the storing of members' personal data in order to provide you with more details. 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 [prudentialstaffps.co.uk](https://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 log in 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  
**The Pensions Manager**  
**Prudential Staff Pension Scheme**

# Data Privacy Statement

## Trustee's commitment to your privacy

The Trustee of 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 2018 and the EU General Data Protection Regulation (EU Regulation 2016/679) as it forms part of the laws of England and Wales (UK GDPR)).

The Trustee's address is:  
**Prudential Staff Pension Scheme**  
**10 Fenchurch Avenue**  
**London**  
**EC3M 5AG**

## 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, your financial information including your contributions and bank account details 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.

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

## **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. The purposes for which the Trustee will process personal data, and the legal basis on which the processing is performed, are as set out on the following pages.

**Processing purpose**

Administering the Scheme in accordance with its Trust Deed and Rules and applicable law.

**Types of personal data**

Information provided by you:

- name
- date of birth
- gender
- marital status
- bank account details
- National Insurance number
- length of employment
- details of dependants
- contact details
- other relevant information provided to us

Information provided by the Company and third parties:

- National Insurance number
- payroll records and tax status information
- information relating to your employment, salary, contributions and benefits
- other relevant information provided to us

**Legal basis for processing**

We have a **legitimate interest** in administering the Scheme in accordance with its governing documents and applicable law.

**Processing purpose**

Determining your eligibility to receive benefits under the Scheme.

**Types of personal data**

Information provided by you:

- name
- date of birth
- gender
- marital status
- National Insurance number
- length of employment
- details of dependants
- other relevant information provided to us

Information provided by the Company and third parties:

- National Insurance number
- payroll records and tax status information
- information relating to your employment, salary, contributions and benefits
- other relevant information provided to us

**Legal basis for processing**

We have a **legitimate interest** in determining whether you are eligible for receiving benefits under the Scheme.

**Processing purpose**

Determining the benefits payable to and in respect of you and paying the correct benefits on time to the correct recipient.

**Types of personal data**

Information provided by you:

- name
- date of birth
- gender
- marital status
- bank account details
- National Insurance number
- length of employment
- details of dependants
- contact details
- other relevant information provided to us

Information provided by the Company and third parties:

- National Insurance number
- payroll records and tax status information
- information relating to your employment, salary, contributions and benefits
- other relevant information provided to us

**Legal basis for processing**

We have a **legitimate interest** in paying the correct benefits on time to the correct recipient in accordance with the Trust Deed and Rules of the Scheme.

**Processing purpose**

Investing your contributions in line with your wishes, or in compliance with a default arrangement.

**Types of personal data**

Information provided by you:

- name
- date of birth
- length of employment
- other relevant information provided to us (such as your investment instructions)

Information provided by the Company and third parties:

- payroll records and tax status information
- information relating to your employment, salary, contributions and benefits
- other relevant information provided to us

**Legal basis for processing**

We have a **legal obligation** to ensure that your contributions are invested in accordance with the Rules of the Scheme and applicable law.

**Processing purpose**

Communicating with you about the Scheme and your benefits.

**Types of personal data**

Information provided by you:

- name
- date of birth
- gender
- marital status
- bank account details
- National Insurance number
- length of employment
- details of dependants
- contact details
- other relevant information provided to us

Information provided by the Company and third parties:

- National Insurance number
- payroll records and tax status information
- information relating to your employment, salary, contributions and benefits
- other relevant information provided to us

**Legal basis for processing**

We have a **legitimate interest** in communicating with you about the Scheme and your benefits.

**Processing purpose**

Establishing, exercising and defending our legal rights.

**Types of personal data**

Information provided by you:

- name
- date of birth
- gender
- marital status
- bank account details
- National Insurance number
- length of employment
- details of dependants
- contact details
- other relevant information provided to us

Information provided by the Company and third parties:

- National Insurance number
- payroll records and tax status information
- information relating to your employment, salary, contributions and benefits
- other relevant information provided to us

**Legal basis for processing**

We have a **legitimate interest** in establishing, exercising and defending our legal rights.

**Processing purpose**

For audit, compliance and other risk management.

**Types of personal data**

Information provided by you:

- name
- date of birth
- gender
- marital status
- bank account details
- National Insurance number
- length of employment
- details of dependants
- contact details
- other relevant information provided to us

Information provided by the Company and third parties:

- National Insurance number
- payroll records and tax status information
- information relating to your employment, salary, contributions and benefits
- other relevant information provided to us

**Legal basis for processing**

We have a **legitimate interest** in auditing the Scheme and ensuring that it is managed properly.

**Processing purpose**

Considering any potential beneficiaries of death benefits under the Scheme.

**Types of personal data**

Personal data of potential beneficiaries:

- name
- date of birth
- marital status
- contact details
- other relevant information provided to us

**Legal basis for processing**

We have a **legitimate interest** in selecting beneficiaries of your death benefits under the Scheme.

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, as set out below:

**Processing purpose**

Considering any potential beneficiaries of death benefits under the Scheme.

**Types of Sensitive Personal Data**

- health information

**Legal basis and special condition for processing**

We have obtained your **explicit consent** to process your health 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, providers of IT services, 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

(for example, regulatory bodies) 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.

The list of recipients is not exhaustive, and we may from time to time need to share personal data with other third parties in order to administer the Scheme and pay benefits, for example, if we engage a different service provider. We will update this statement if the categories of recipients change.

## International transfers of personal information

As required by data protection legislation, the Trustee has strict security procedures regarding the storage and disclosure of personal information. The personal information that is collected about you may be transferred to, and stored at, or processed in one or more countries outside the UK which have not yet been deemed by the UK Government to offer adequate data protection. It may also be processed by staff operating outside the UK 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 the UK GDPR and as described above under retention of personal information. If the Trustee decides that personal information does need to be transferred to a country outside the UK which does not offer adequate protection, the Trustee will notify you in writing and ensure that appropriate technical and organisational measures are put in place so that such processing meets the requirements of the

data protection legislation. We may safeguard such transfers through the use of Standard Contractual Clauses or International Data Transfer Agreements which have been approved for this purpose in accordance with Article 46(2)(c) or (d) of the UK GDPR. 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 information will not be transferred outside the UK.

The Scheme's advisers and service providers (including insurers and reinsurers) may hold and process your personal information when providing services to the Scheme. A list of these advisers and service providers (including insurers and reinsurers) and links to their Privacy Statements can be found on the Scheme's website or obtained by writing to the Pensions Manager.

## 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 UK GDPR including:

- The right to access your personal data. This right always applies. However, there are some exemptions which mean you may not always receive all of your personal data that we process;
- The right to have your personal data rectified if it is inaccurate or incomplete. This right always applies;
- The right to have your personal data deleted or removed in certain circumstances, for example, if there is no reason for its continued storage and processing;
- The right to restrict the processing of your personal data in certain circumstances, for example, if you want us to establish its accuracy or the reason for processing it;
- The right to object to your personal data being processed where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing);
- The right to request the transfer of personal data which you have given us to another party. This right only applies where we rely on your consent to process your personal data; 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 at any time. Once we receive notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal.

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

## 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 [prudentialstaffps.co.uk](https://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 [prudentialstaffps.co.uk](https://prudentialstaffps.co.uk).

## Definitions used in this Statement

The **Trustee** of Prudential Staff Pension Scheme is Prudential Staff Pensions Limited (a limited company).

**Company** means M&G plc or companies whose ultimate parent company is M&G plc.

## Small Print

Company means M&G plc or any associated company/ employer that offers you membership of the Scheme through your contract of employment.

All benefits are payable in accordance with the Trust Deed and Rules, the legal document governing the Scheme. In the event of any discrepancy between any information provided to you and the Trust Deed and Rules, the Trust Deed and Rules will prevail.

## Contact

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

**Write to: Prudential Staff Pension Scheme**  
**10 Fenchurch Avenue**  
**London**  
**EC3M 5AG**

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

**Email: [icocasework@ico.org.uk](mailto:icocasework@ico.org.uk)**

**Phone: 0303 123 1113**

**Write to: Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**

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

**Email: [PSPSDC.SC@prudential.co.uk](mailto:PSPSDC.SC@prudential.co.uk)**

**Phone: 0345 300 2637**

Help is available Monday to Friday 9am to 5pm

**Post: Prudential (PSPS DC)**  
**LANCING**  
**BN15 8GB**

**[prudentialstaffps.co.uk](https://prudentialstaffps.co.uk)**



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