

## **LONDON & QUADRANT HOUSING TRUST STAFF BENEFITS PLAN – PRIVACY STATEMENT**

### **Introduction**

As Trustees of the London & Quadrant Housing Trust Staff Benefits Plan (“the Plan”), we act as data controllers of your personal data for the purpose of data protection legislation.

### **Other data controllers**

It has been clarified that two of our advisers also act as data controller when carrying out certain statutory activities for us. These are our Plan Actuary, Patrick Bloomfield, whose address is Hymans Robertson LLP, One London Wall, London EC2Y 5EA and our Plan Auditor, BDO LLP, 31 Chertsey Street, Guildford, Surrey, GU1 4HD.

Where the Plan Actuary and Auditor are fulfilling their statutory function (or any other function required by the rules of the Plan) we act as joint data controllers of your personal data and have control over the processing of it.

In some circumstances, London & Quadrant Housing Trust also acts as a joint data controller, for example when processing Plan data in its capacity as the Plan’s principal employer.

For the processing of all other Plan data we (the Trustees) are sole data controller.

### **Use of personal information**

As Trustees, we may use personal information about you and your dependants in order to administer the Plan (for example, to calculate and pay your benefits).

The type of personal data held by the Trustees may include names and other identifying information, contact details, age, gender, employment history, salary and remuneration data, bank account details and marital status.

The Plan Actuary will also use some of this information so that he can advise us on financial matters. For example, he may use it to value the Plan’s liabilities in order to advise us on how much money should be paid into the Plan. The Plan Auditor will use some of this information in order to audit the Plan’s annual accounts.

The legal basis for the processing of your personal data is the Trustees’ legitimate interests in administering the Plan, the Plan Actuary/Auditor’s legitimate interests in providing services in connection with the administration of the Plan and/or (in certain cases) that the processing is necessary for compliance with legal obligations to which the Trustees and/or the Plan Actuary/Auditor is subject.

If, and only if, it is needed in order to administer the Plan, to assist the Employer in its obligations and/or to put appropriate insurance in place, the Trustees and/or the Plan Actuary may disclose personal information about you and your dependants to London & Quadrant Housing Trust (as the sponsoring employer), to professional advisers, to administrators (such as Capita Employee Benefits), to insurance companies, regulatory and/or governmental authorities, other pension schemes or to anyone else with a legitimate reason to require it.

Your personal data will be retained for as long as is required for the purpose of administering the Plan and providing benefits to and in respect of you.

The protection of your personal data is important to all of us – to you, to us, to the Plan Actuary and Auditor.

As data controllers, the Trustees and Plan Actuary/Auditor have a duty to keep your data safe. We take all reasonable steps to ensure that this is the case but if you have any questions about how your information is used or kept secure, please contact the appropriate name below. Where relevant, we will pass your questions on to the Plan Actuary/Auditor on your behalf.

### **Your rights**

Subject to the provisions of the relevant data protection laws, you have a right:

- to be told about the data that the Trustees hold about you and to receive a copy of the information that constitutes your personal data on request;
- to request access to and rectification or erasure of personal data, to restrict the processing of your personal data and the right to data portability;
- to withdraw consent to processing, to the extent that processing is based on consent; and
- to lodge a complaint about processing with the Information Commissioner's Office (the supervisory body in the UK).

If you wish to exercise any of these rights, or wish to contact the Trustees about your personal data, in the first instance you should contact The Secretary to the Trustees of the London & Quadrant Housing Trust Staff Benefits Plan, c/o Hymans Robertson LLP, 45 Church Street, Birmingham, B3 2RT.