

FIREFIGHTERS' PENSION SCHEME PRIVACY NOTICE

How we use personal information to administer the Firefighters' Pension Scheme.

This notice is for members (and beneficiaries) of the following Firefighters' Pension Schemes (the "Schemes"):

- Firefighters' Pension Scheme 1992;
- Firefighters' Pension Scheme 2006;
- Firefighters' Pension Scheme 2015;
- Modified Firefighters' Pension Scheme .

This notice has been prepared by North Wales Fire and Rescue Authority (the "**Fire Authority**", in its capacity as the manager of the Scheme (the "**Scheme Manager**").

This privacy notice is also provided at the following link:

<http://www.nwales-fireservice.org.uk/about-us/publication-scheme/general-data-protection-regulation/>.

Why we are providing this notice to you

As Scheme Manager we hold certain information about you (personal data) which we use to administer the Scheme and to pay benefits from it. This notice is designed to give you information about the data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it.

Why do we collect information about you?

The Fire Authority holds personal data about you in its capacity as data controller for the proper handling of all matters relating to the Scheme, including its administration and management. This includes the need to process your data to:

- Contact you;
- To calculate, secure and pay your benefits;
- For statistical and financial modelling (for example, when we assess how much money is needed to provide members' benefits);
- For reference purposes (for example, when we assess how much money is needed to provide members benefits and to inform the Welsh Government of any additional funding requirements);
- To manage liabilities and administer the Schemes generally;
- Assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits;
- To identify your potential or actual benefit options and, where relevant, implement those options;
- To comply with our legal and regulatory obligations as Scheme Manager;
- To address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Scheme.

Our lawful basis

Under the Data Protection Act 2018, we can only process personal data under a lawful basis. The lawful basis for the above activities is because we have a legal obligation under the Superannuation Act 1972 to administer the schemes.

An additional lawful basis is also required for the processing of special category data, such as health information, and that basis can be found in Paragraph 1(1)(a) of Part 1 of Schedule 1 of the Data Protection Act 2018, i.e. the processing is necessary for the purposes of performing or exercising obligations in connection with employment, social security or social protection.

What personal data we hold, and how we obtain it

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address;
- Identifying details, including date of birth, national insurance number and employee and membership numbers;
- Information that is used to calculate and assess eligibility for benefits, for example, length of service or membership and salary information;
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax details;
- Information about your family, dependents or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death;
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or where your health is relevant to a claim for benefits following the death of a member of the Scheme;
- Information about a criminal conviction where this may result in pension forfeiture.

We obtain some of this personal data directly from you. We may also obtain data (for example, salary information) from your current or past employer(s), from a member of the Scheme (where you are or could be a beneficiary of the Scheme as a consequence of that person's membership of the Scheme) and from a variety of other sources including public databases (such as the Register of Births, Deaths and Marriages), our advisers and government or regulatory bodies, including those in the list of organisations that we may share your personal data with set out below.

Where we obtain information concerning certain special categories of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation (please see the section above entitled "Our lawful basis").

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, please ensure that those individuals are aware of the information contained within this notice.

Organisations with which we may share your personal data

Dyfed Pension Fund (DPF) has been appointed to administer the schemes on behalf of the Fire Authority; acting as a data processor in the capacity that the information passed to them is for the specific processing purposes of administering the schemes.

DPF will also share with the following third party organisations:

- Fund Actuary;
- Tracing bureaus for mortality screening and locating members;
- Overseas payments provider to transmit payments to scheme members with non-UK accounts;
- Printing companies;
- Pensions software provider;
- Suppliers of IT, document production and distribution services.

For further information about how DPF process your information on our behalf, please take a look at their privacy notice which can be accessed here -

<http://www.dyfedpensionfund.org.uk/media/1628/gdpr-privacy-notice-english.pdf>

As the data controller for the schemes, North Wales Fire and Rescue Service may share information with the following third party organisations:

- External auditors (currently Wales Audit Office);
- The Government Actuary's Department;
- The Courts of England and Wales – for the purpose of processing pension sharing orders on divorce.

In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

Where requested or if we consider that it is reasonably required, we may also provide your data to government bodies and dispute resolution and law enforcement organisations, including those listed above, the Pensions Regulator, the Pensions Ombudsman and Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their statutory functions.

The organisations referred to in the paragraphs above may use the personal data to perform their functions in relation to the Scheme as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties, to the extent they consider the information is reasonably required for a legitimate purpose.

How long we keep your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Scheme, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations. In practice, this means that your personal data will be retained for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme and for a period of 15 years after those benefits stop being paid.

For the same reason, your personal data may also need to be retained where you have received a transfer, or refund, from the Scheme in respect of your benefit entitlement.

Your rights

You have a right to access and obtain a copy of the personal data that the Fire Authority holds about you and to ask the Fire Authority to correct your personal data if there are any errors or it is out of date or incomplete. In certain circumstances you have the right to object to the processing of your personal data and in some cases you may also have a right to ask the Fire Authority to restrict the processing of your personal data until any errors are corrected or to transfer or (in very limited circumstances) erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via its telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Fire Authority as indicated below. You also have the right to lodge a complaint in relation to this privacy notice or the Fire Authority's processing activities with the Information Commissioner's Office which you can do through the website above or their telephone helpline.

Contacting us

We are required by law (General Data Protection Regulation / GDPR) to have a Data Protection Officer and their contact details are:

Data Protection Officer

North Wales Fire and Rescue Service

Ffordd Salesbury

St Asaph

Denbighshire

LL17 0JJ

Telephone number: 01745 535250

Email: dpo@nwales-fireservice.org.uk

Website address: <http://www.nwales-fireservice.org.uk/fire-and-rescue-authority?lang=en>