

FULL PRIVACY NOTICE

For the members and beneficiaries of benefits administered by the Dyfed Pension Fund

This notice is for members [and beneficiaries] of the Local Government, Police and Firefighters Pension Schemes administered by the Dyfed Pension Fund (the “Fund”). It has been prepared by Carmarthenshire County Council (the “Administering Authority”, or “we”) in its capacity as the administering authority of the Dyfed Pension Fund and also as administrator of the Police Pension Scheme and the Firefighters Pension Scheme.

This privacy notice is also provided at the following link:

www.dyfedpensionfund.org.uk

Why we are providing this notice to you

As the Administering Authority of the Fund we hold certain information about you (“personal data”) which we use to administer the Fund 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.

The technical bit

The Administering Authority holds personal data about you in its capacity as data controller for the proper handling of all matters relating to the Fund, 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 and for reference purposes (for example, when we assess how much money is needed to provide members’ benefits and how that money should be invested), and to manage liabilities and administer the Fund generally. Further information about how we use your personal data is provided below.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) we need to process your personal data to satisfy our legal obligations as the Administering Authority of the Fund; and
- b) we need to process your personal data to carry out a task in the public interest or in the exercise of official authority in our capacity as a public body; and
- c) because we need to process your personal data to meet our contractual obligations to you in relation to the Fund (for example, under an agreement that you will pay additional voluntary contributions to the Fund), or to take steps, at your request, before entering into a contract.

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 Fund.
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Fund and the employer or Fund may be reimbursed from your benefits.

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) or companies that succeeded them in business, from a member of the Fund (where you are or could be a beneficiary of the Fund as a consequence of that person's membership of the Fund) 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. You have the right to withdraw your consent to the processing at any time by notifying the Administering Authority in writing. However, if you do not give consent, or subsequently withdraw it, the Administering Authority may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

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

How we will use your personal data

We will use this data to deal with all matters relating to the Fund, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you.
- to assess eligibility for, calculate and provide you (and, if you are a member of the Fund, your beneficiaries upon your death) with benefits.
- to identify your potential or actual benefit options.
- for statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members' benefits and how that money should be invested).
- to comply with our legal and regulatory obligations as the administering authority of the Fund.
- to address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Fund.
- the management of the Fund's liabilities, including the entering into of insurance arrangements and selection of Fund investments.
- in connection with the sale, merger or corporate reorganisation of or transfer of a business by the employers that participate in the Fund and their group companies.

Organisations that we may share your personal data with

From time to time we will share your personal data with advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Fund. Some of those organisations will simply process your personal data on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal data that we share with them. They are referred to as data controllers and we have highlighted them in the table below. You will be able to find out about their own data protection policies (which will apply to their use of your data) on their websites.

These organisations include the Fund's:

Data processors	Data controllers
<ul style="list-style-type: none"> • Accounting services – (Carmarthenshire County Council) • Tracing bureaus for mortality screening and locating members – (currently ATMOS Data Services) • Overseas payments provider to transmit payments to scheme member with non-UK accounts – (currently Western Union) • Printing companies – (various, as assigned per tender) • Pensions software provider – (currently Aquila Heywood) • Suppliers of IT, document production and distribution services • Tracing bureau locating members – (currently JLT Benefit Solutions Limited, subject to tender) 	<ul style="list-style-type: none"> • Actuarial consultant – (currently Mercers) • Scheme benefit consultant – (currently Mercers) • Additional Voluntary Contribution providers – (currently Prudential, Standard Life & Equitable Life) • Legal adviser – (currently Eversheds) • Fund Actuary – (currently Mercer) • External auditor – (currently the Audit General for Wales) • Internal auditor – (currently Carmarthenshire County Council) • LGPS National Insurance database – (South Yorkshire Pensions Authority) • The Department for Work and Pensions • The Government Actuary's Department • The Cabinet Office – for the purposes of the National Fraud Initiative • Welsh Government • Welsh Local Government Association • National Local Government Association • Ministry for Housing, Communities and Local Government • Home Office • HMRC • The Courts of England and Wales – for the purpose of processing pension sharing orders on divorce • Mid and West Wales Fire & Rescue Service (for current and past employees only) • North Wales Fire & Rescue Service (for current and past employees only) • Dyfed-Powys Police (for current and past employees only) • Scheme employers

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

From time to time we may provide some of your data to your employer and their relevant subsidiaries (and potential purchasers of their businesses) and advisers for the purposes of enabling your employer to understand its liabilities to the Scheme. Your employer would generally be a controller of the personal data shared with it in those circumstances. For example, where your employer is engaged in providing services subject to an outsourcing arrangement, the Administering Authority may provide information about your pension benefits to your employer and to potential bidders for that contract when it ends or is renewed.

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 legal functions.

The organisations referred to in the paragraphs above may use the personal data to perform their functions in relation to the Fund 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 (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

In some cases these recipients may be outside the UK. This means your personal data may be transferred outside the EEA to a jurisdiction that may not offer an equivalent level of protection as is required by EEA countries. If this occurs, we are obliged to verify that appropriate safeguards are implemented with a view to protecting your data in accordance with applicable laws. Article 49 of the GDPR would apply in such instances. Please use the contact details below if you want more information about the safeguards that are currently in place.

We do not use your personal data for marketing purposes and will not share this data with anyone for the purpose of marketing to you or any beneficiary.

How long we keep your personal data

We aim to hold your Pension Personal Information on our systems for the longest of the following periods:

- a) to enable us to fulfil our obligations in respect of the administration of the Scheme and any other services requested by you;
- b) for the period required by law; and
- c) for the period to enable us to evidence, in relation to any claim made by you, matters relating to your membership of the Scheme including, without limitation, whether you received a refund of contributions, had a transfer payment made or took a lump sum in place of all or part of your Scheme benefits.

This will mean that processing your Pension Personal Information will continue after you have ceased to have any benefits in the Scheme.

Your rights

You have a right to access and obtain a copy of the personal data that the Administering Authority holds about you and to ask the Administering Authority to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask the Administering Authority to restrict the processing of your personal data until any errors are corrected, to object to processing 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 their 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 Fund Administrator as indicated below. You also have the right to lodge a complaint in relation to this privacy notice or the Administering Authority's processing activities with the Information Commissioner's Office which you can do through the website above or their telephone helpline.

The personal data we hold about you is used to administer your benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted this may affect the payment of benefits to you (or your beneficiaries). In some cases it could mean the Administering Authority is unable to put your pension into payment or has to stop your pension (if already in payment).

Updates

We may update this notice periodically. Where we do this we will inform members of the changes and the date on which the changes take effect.

Contacting us

Please contact the Fund administrator for further information:

Dyfed Pension Fund (as administered by Carmarthenshire County Council)
County Hall
Carmarthen
SA31 1JP

Telephone Number: 01267 224 043
Email Address: pensions@carmarthenshire.gov.uk
Website Address: www.dyfedpensionfund.org.uk

Data Protection Officer

You may also contact our data protection officer for further information.

John Tillman
Data Protection Officer
Carmarthenshire County Council
County Hall
Carmarthen
SA31 1JP

Email Address: JWTillman@carmarthenshire.gov.uk