



# PRESSPART RETIREMENT BENEFIT SCHEME

## Privacy Policy

This privacy notice is relevant to you if you are a member of the Presspart Retirement Benefit Scheme (known as “**the Scheme**”).

This privacy notice has been issued to comply with the General Data Protection Regulation (GDPR) which comes into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

### What is this privacy notice about

The Trustees of the Scheme need personal information about you in order to run the Scheme and pay benefits.

Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustees about how your personal information will be used for those purposes.

These other parties include the Scheme Actuary (currently Ben Roach of Barnett Waddingham LLP (“**BW**”). BW need personal data about you to provide actuarial services to the Trustees as required under the Scheme’s Deed and Rules and legislation.

As required by data protection law, this privacy notice gives you information about the data controllers who use your personal data in relation to the Scheme.

The privacy notice explains how we will use any personal data they collect from you as the member. It also covers any personal data we collect from the employer (Presspart Manufacturing Limited), adviser or intermediary who has set up or looks after the Scheme. The notice also explains how we will comply with data protection law.

In legal terms, the Trustees and BW are ‘joint data controllers’ in respect of this information. In this notice we must explain some things about the personal data we hold, and your rights regarding the data. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, ‘we’ or ‘us’ means both the Trustees of the Scheme from time to time and BW where they are acting as joint data controllers in relation to your personal information (as described above).

For simplicity if there is a query in relation to how your data is used by the Scheme (whether by the Trustees or by BW) please contact Jean Battersby who is Trustee of the Scheme and also a member of the Presspart Data Protection Team at the following email address [jean.battersby@presspart.com](mailto:jean.battersby@presspart.com) or please telephone 01254 584125.

## **Information that we hold**

We normally hold some or all of the following types of personal information:

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment).
- Contact details (including your address, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

## **Where do we obtain your personal data**

Some of the information that the Trustees have comes directly from you. In addition, BW (who administer the Scheme on behalf of the Trustees) may also get information (such as length of service, salary and previous contributions) directly from the employer.

Personal data in beneficiary nominee forms will come from you as the member. Personal data about members' dependants, other beneficiary nominees, and death in service nominees, will also come from you or your representative.

Sometimes we get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if we have lost touch with you and are trying to find you.

If we ask you for other information in future (for example about your health) we will explain whether you have a choice about providing it and any consequences if you don't do so.

## **What is the legal basis for using your personal data**

The Trustees must by law provide benefits in line with the Scheme's governing documents and must also meet other legal requirements when looking after and administering the Scheme.

We will use your personal data to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal data with other people for this reason, such as courts and law-enforcement agencies.

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We also have a legitimate interest in properly looking after the Scheme. This includes paying benefits as they fall due, communicating with you to keep your details updated and ensuring that correct levels of contributions are paid, that benefits are correctly calculated, and that the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

To achieve this we may share your personal data with various entities, including: new trustees, the Scheme's employer (Presspart Manufacturing Limited), the Scheme's administrator (BW), HMRC, auditors, insurers (which may be to arrange a particular entitlement, for instance via an individual or bulk annuity policy) and other professional advisers, your employer, the Pensions Ombudsman.

If we need to use information about your health which is "special data" (or other very personal and private information), we may ask your consent. (You can withdraw that consent at any time). However sometimes there may be reasons of public interest or law that enables us to use this information without consent. We will do this if this helps to look after the Scheme sensibly.

We may also share your personal data with someone else if you have given your consent – for example, if you transfer your benefits out of the scheme. Sometimes your personal data may be used for statistical research but only in a form that no longer identifies you.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, we may share your personal information with the employers so that they can contact you for that purpose.

### **Scheme Actuary**

The Scheme Actuary is appointed by the Trustees to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. He will use your personal information for this purpose and has a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with his own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

### **How long do the Trustees and BW keep your personal data**

We need to keep some of your personal data long enough to make sure it can satisfy its legal obligations regarding the Scheme and pay any benefits due to you or concerning you.

We will keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it, if we have a legal obligation to do so. This is because we have to deal with our legal obligations, and any queries or complaints. (These may come from you or your beneficiaries/others who may ask the Trustees if they are entitled to payments). In any event your personal data will be stored for not longer than 7 years after the date the Scheme is wound up.

## Keeping Your Personal Data safe

When we pass your information to a third party, we seek to ensure that the other person has appropriate security measures in place to keep your information safe and to comply with general principles regarding data protection.

The third party will need to warrant that they have appropriate measures in place to ensure the security of data including but not limited to encryption, pseudonymisation, resilience of processing systems and backing up Data in order to be able to reinstate the system.

The appropriateness of these measures will be regularly evaluated in the light of technological developments, the cost of implementation, the nature, scope, context and purposes of the processing of the Data, the risk to the data subjects and the risks to which the Data are exposed.

Your data will usually be processed and stored within the UK or the European Economic Area (“EEA”) However, there may be some circumstances in which it is transferred overseas by the Trustees or by a third party it is passed to. Where this applies, all steps reasonably required will be taken to ensure your data is treated securely and any third party this applies to has committed to comply with equivalent obligations to ensure the data is treated securely.

## How you can help to keep your personal data up to date

We need to ensure your personal data is accurate and up to date. Please tell us if your details change (for example, if you move address). Our contact details are at the end of this notice. In addition, you have rights under data protection law to have inaccurate personal data corrected and incomplete data completed. For more details about your rights, please see below.

## Your rights as a “data subject”

Here are short descriptions of your rights:

**Right of access** – you have a right to request access to your personal data, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how it is processed.

**Right of rectification** (correction) – in certain circumstances you have a right to ask for your personal data to be corrected if it is inaccurate, and completed if it is incomplete. Where your personal data in question has been disclosed to organisations, they must be informed of the rectification if possible.

**Right to be forgotten** – in certain circumstances, you can ask to have your personal data erased. It is unlikely to be possible to accept your request if, for example, the Trustee and/or BW (as relevant) has a legal duty to retain or process your information.

**Right to restriction of processing** – if certain conditions apply, you have a right to restrict the processing of your information. This includes when you contest it as being inaccurate (until the accuracy is proved); if you have objected to the processing (when it was necessary for legitimate interests) and the Trustees and/or BW (as relevant) is considering whether its legitimate interests override your own; if you consider that the processing is unlawful (and if this is true) so that you can oppose erasure and request restriction instead; or if the Trustees or BW (or both, if relevant) no longer need the personal data for the purposes they held it but you require one or both of them to continue to hold it to establish, make or defend legal claims.

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**Right of portability** – in certain circumstances, you have the right to move, copy or transfer your personal data to another organisation or to yourself. This right is only relevant if personal data is being processed based on consent (or for performance of a contract) and is done automatically. This right is different from the right of access (see Your rights as a data subject against the Trustee and BW above) and the types of information you can get under the two separate rights may be different. Using the data portability right, you cannot get all the personal data you can get using the right of access.

**Right to object** – in certain circumstances, you have the right to object to certain types of processing of your personal data when it is based on legitimate interests, when it is processed for direct marketing or when it is processed for the purposes of statistics. Your rights to object may be relevant if you wish to find out more about what legitimate interests the Trustees or BW (or both) rely on (as are listed in their respective parts of this privacy notice). Please note that the Trustees or BW does not do direct marketing.

**Automated decision making** – the Trustees or BW does not make automated decisions.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustees may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

You have the right to lodge a complaint directly with the supervisory authority, the Information Commissioner who can be contacted on 0303 123 1113. You may be asked to provide proof of identity when making these requests. Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>.

You have other rights under data protection law that you can exercise against us but these do not apply in all circumstances. You can exercise those rights free of charge except in very limited circumstances, which will be explained to you if relevant.

For more information about all these rights, and how to exercise them against us, please contact the ICO (details above).

## Changes to this privacy notice

This notice was last updated April 2025. We may amend this privacy notice from time to time to keep it up to date or to comply with legal requirements. If necessary, you may be notified of changes in writing and otherwise the updated notice will be published on the Presspart website.

## How to Contact us

If you wish to make a complaint, find out more information about how your personal data is being processed by or on the behalf of the Trustees or BW (or both) as your data controller, or exercise your rights, you can contact us at the below address.

Jean Battersby  
C/O Presspart Retirement Benefit Scheme  
Whitebirk Industrial Estate  
Philips Road  
Blackburn  
Lancashire  
BB1 5RF

[jean.battersby@presspart.com](mailto:jean.battersby@presspart.com)

01254 584125

## Definitions

**Data Controller or 'Controller'**: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the **processing** of **personal data**; where the purposes and means of such **processing** are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

**Data Processor or 'processor'**: means a natural or legal person, public authority, agency or other body which processes **personal data** on behalf of the controller.

**Data processing or 'processing'**: means any operation or set of operations which is performed on **personal data** or on sets of **personal data**, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Personal data**: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special category of data**: means any **personal data** revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the **processing** of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.