

This privacy notice is for members and beneficiaries (who will be referred to as “you”) of the **Norfolk Pension Fund** (the “Fund”). It has been prepared by **Norfolk County Council** (the “Administering Authority”, or “we”) in its capacity as the administering authority of the Fund and to provide information on how the Fund uses your information. By ‘use’ we mean the various ways it may be processed including storing and sharing the information and is explained further in the sections below.

We also provide further details regarding who we are, how long we use your information for, your rights under the UK General Data Protection Regulation (the GDPR) and how to exercise them on our web site at [www.norfolk.gov.uk](http://www.norfolk.gov.uk) [General Privacy Notice](#). Both that, and this privacy notice, can also be accessed via our website [norfolkpensionfund.org](http://norfolkpensionfund.org). Alternatively, you can ask us for copies.

### **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 privacy notice is designed to give you information about the data we hold about you, why we have it, where it comes from, how we use it, your rights in relation to it and the safeguards in place to protect it.

### **What we use your information for**

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.

We will use this data to deal with all matters relating to the Fund, including its administration and management and administer any in house AVC’s. 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.

We also use this information to assess the quality of our services and evaluate and improve our policies and procedures.

## **What personal data we collect and use about you**

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.

## **Who provides this information**

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)
- 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.

## **How the law protects you and the legal basis for processing your information**

We have legal grounds to process this information because:

- we need to process your personal data to satisfy our legal obligations as the Administering Authority of the Fund
- 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. The tasks we carry out in the public interest are under the:
  - Local Government Pension Scheme Regulations 2013, as amended
  - Local Government Pension Scheme (Transitional Provisions, Savings and Amendment) Regulations 2014, as amended
- we need to process your personal data for the legitimate interests of administering and managing the Fund and liabilities under it, calculating, securing and paying benefits and performing our obligations and exercising any rights, duties and discretions the Administering Authority has in relation to the Fund; and
- 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.

## 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 (data processors). 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. 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 or by contacting them directly.

These organisations include the Fund's:

<b>Data processors</b>	<b>Data controllers</b>
<ul style="list-style-type: none"> <li>• Tracing bureaus for mortality screening and locating members – (currently LexisNexis)</li> <li>• Overseas payments provider to transmit payments to scheme member with non- UK accounts – (currently Citibank)</li> <li>• Printing companies – (currently Norse and Adare)</li> <li>• Pensions software provider – (currently Heywood and Civica)</li> <li>• Suppliers of IT, document production and distribution services (currently Adare)</li> </ul>	<ul style="list-style-type: none"> <li>• Investment adviser – (currently Hymans)</li> <li>• Additional Voluntary Contribution providers – (currently Prudential, Clerical Medical and Utmost Pensions)</li> <li>• Fund Actuary – (currently Hymans)</li> <li>• Statutory auditor – (currently Ernst &amp; Young)</li> <li>• External auditor – (currently Ernst &amp; Young)</li> <li>• Internal auditor – (currently Norfolk Audit Services)</li> <li>• LGPS National Insurance database – (South Yorkshire Pensions Authority)</li> <li>• The Department for Work and Pensions</li> <li>• The Government Actuary's Department</li> <li>• The Cabinet Office – for the purposes of the National Fraud Initiative</li> <li>• HMRC</li> <li>• The Courts of England and Wales – for the purpose of processing pension sharing orders on divorce</li> </ul>

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

In addition, where we make Fund investments or seek to provide benefits for Fund members in other ways, such as through the use of insurance, then we may need to share personal data with providers of investments, insurers and other pension scheme operators. 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 employment 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 HM 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. 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 we keep your information**

The information is stored electronically, on the County Council's records management system. Additionally, information is securely stored in other mediums, including email accounts and in paper files.

### **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 we may receive about our administration of the Fund, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations. In practice, this means 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 Fund and for a minimum 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 Fund in respect of your benefit entitlement.

## **Requests for further information**

The personal data we hold about you is used to administer your Fund 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) under the Fund. 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).

## **Automated decision making**

We do not make automated decisions about you and your children but if we do in the future, we will let you know.

## **Changes to this notice**

We may amend this privacy notice at any time so please review it frequently. The date below will be amended each time this notice is updated.

This notice was updated on 1 November 2022.

## **Contacting us**

Please contact the Norfolk Pension Fund for further information at:

### **Postal Address Only:**

Norfolk Pension Fund  
County Hall  
Martineau Lane  
NORWICH  
NR1 2DH

Email: [pensions@norfolk.gov.uk](mailto:pensions@norfolk.gov.uk)  
Telephone: 01603 495923