

Channel 4 Television Staff Pension Plan



Privacy notice

The Trustees of the Channel Four Television Staff Pension Plan (the “Plan”) are committed to protecting your information and acting in accordance with your rights under data protection law.

Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Plan), the date you joined or left the Plan, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments; and
- in some cases, special categories of personal data such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, this information is collected directly from your employer or from third parties providing certain services to the Plan, such as tracing and mortality screening services.

The Scheme Actuary (currently Hymans Robertson) also processes personal data in the performance of their responsibilities. Further information regarding data processing performed by or on behalf of Hymans Robertson is included in this notice.

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other pension schemes;
- b) for general administration of the Plan, including: to record and pay benefits; for actuarial valuations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud;
- c) for meeting our on-going regulatory and compliance obligations, including assisting with the investigation or prevention of crime;
- d) to improve our processes and our use of technology, including testing and upgrading systems, and to learn about other processes we can use to improve the administration of the Plan;
- e) when we, or the Corporation, undertake activities from time to time to help us manage the liabilities of the Plan, such as obtaining insurance, longevity hedging, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises, including (where relevant) disclosures to the Corporation or administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make the disclosures to the Corporation for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of the Corporation, such interests in each case not being overridden by your privacy interests;
- (ii) required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- (iii) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and
- (iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the Plan rules require you to provide information which we cannot otherwise process without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record or pay your or your beneficiaries' benefits.

Disclosures of your information

We share your information with the following recipients:

- our suppliers, the Corporation, and other providers of services to us and the Corporation, such as our administrator, currently Hymans Robertson, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Plan's actuary (for actuarial calculations), currently Hymans Robertson, the Plan's auditor, currently Crowe Clark Whitehill, and printing, communication, IT and hosting and tracing providers (and when we do so we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- the Plan's administrator, currently Hymans Robertson LLP. When providing administration services to the Plan, Hymans acts as a data processor and processes member data on behalf of the Trustees.
- Hymans Robertson LLP also provides actuarial and consultancy services, including advice and analytics to the Trustees of the Plan, including through the Plan Actuary. When providing actuarial services, the Plan Actuary and Hymans act as joint data controllers with the Trustees. For more information on these roles, please visit: https://www.hymans.co.uk/media/uploads/How_Hymans_Robertson_uses_your_personal_data.pdf
- Hymans Robertson LLP may appoint service providers or sub-processors to help in the provision of their services. For details, please visit: www.hymans.co.uk/information/trust-centre
- the Corporation for other relevant purposes, such as for audit purposes or in relation to corporate transactions initiated by the Corporation, and to allow you to flex your benefits including your pensions options;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;

- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information, including by the Plan's auditor for the purposes referred to in (e) above, may involve transferring your information outside of the European Economic Area. In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom. Further details of these transfers including information about any data transfer agreements we use are available from us on request.

Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our records retention policy. We determine the period envisaged within such documentation with regard to the Plan's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Plan, and responding to legal claims or regulatory requests.

Your rights

Under data protection law, you have rights: of access to and rectification or erasure of your personal data; to restrict or object to its processing; to tell us that you do not wish to receive marketing information (if relevant); and (in some circumstances) to require certain of your information to be transferred to you or a third party. You can exercise such rights by contacting us at the details set out on this page.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent.

You can also lodge a complaint about our processing of your personal information with the office of the Information Commissioner (www.ico.org.uk).

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out any request from you to transfer benefits, to retire early on grounds of ill-health, to receive certain lump sums, or for payment of discretionary death benefits. We will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was updated in July 2018. It is non-contractual. We reserve the right to amend it from time to time.

Contact us

If after reading this notice you have any questions, you can contact the Administration Team as follows:

Write to:
Channel 4 Pensions
C/O Hymans
Robertson LLP
45 Church Street
Birmingham
B3 2RT

Call
0121 210 4340

E-mail
channel4@hymans.co.uk

Remember you can let us know if you move house or if any of your personal circumstances change so that you don't lose touch with your Channel 4 pension.