

Trustee of the Baptist Pension Scheme

Privacy Notice

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

The data controller in respect of the personal data you submit to us either directly or indirectly is Baptist Pension Trust Limited, the Trustee of the Baptist Pension Scheme (the **Scheme**). You can contact the Trustee via the Scheme Pensions Team at pensionshared@baptist.org.uk. We use your personal data to administer and manage your pension and pay you, or any person in respect of you, the benefits provided by the Scheme. The Scheme's administrator, Broadstone Corporate Benefits Ltd (**Broadstone**), carries out most of the processing of personal data described in this Privacy Notice on behalf of the Trustee.

We hold some or all of the following types of personal data about you:

- Your name, date of birth, national insurance number and bank account information.
- 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.
- Details of your pension contributions and benefits and details of other pension arrangements you may have.
- Copies of identification and similar documents e.g., birth, marriage, civil partnership and death certificates, divorce decrees, pension sharing and earmarking orders.
- Whether you are married or in a civil partnership and other information we might need to pay any death benefits due in relation to you.
- Information relating to any nominated beneficiary included in a death benefit nomination form and other potential beneficiaries.
- Details of your financial circumstances where relevant to the administration of the Scheme and the payment of benefits.

Baptist Pension Trust Limited
Baptist House, PO Box 44 129 Broadway Didcot Oxon OX11 8RT
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- Name, address, date of birth, national insurance number and relationship to member of anyone claiming death benefits. The Trustee may also need information about such an individual's financial position.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.
- Information about other pensions that you have, where you decide to participate in the Pensions Dashboard programme which collates this information on your behalf.

It is important that the personal data we hold about you is accurate and up to date. If any of your personal details change, please let us know as soon as possible. You can update your personal details through Broadstone's Engage Members portal or by emailing baptistpensions@broadstone.co.uk.

Special category data

We may sometimes use personal data about you which is sensitive and subject to special protections under data protection law (**special category data**). This could include information about your health where it is relevant to, for example, your entitlements to insurance benefits from the Scheme, if you are seeking early retirement on ill-health grounds, or to adapt our services to accommodate any vulnerabilities. We might also, very rarely, have information about criminal convictions and offences where it is relevant to your entitlements under the Scheme.

Who we collect your personal data from

Some of the information we have comes directly from you. We may also get information (such as your salary and length of service) directly from your employer / former employer or their payroll providers. In addition, the Scheme administrator may have obtained information from you and passed it to us.

Sometimes we get information from other sources: for example, another scheme if you have transferred benefits from that scheme; government departments such as HMRC and DWP; the Pensions Dashboard ecosystem; tracing and identity verification partners and publicly accessible sources (eg the electoral roll) if we have lost touch with you and we are trying to find you.

Legal basis and purposes for processing

We process your personal data in accordance with the Scheme's governing documentation, which we are required to do by law and guidance issued by the Pensions Regulator. The following processing activities are therefore necessary so that we can comply with our legal obligations:

- Administering and managing your pension and paying benefits to you and/or your spouse and dependants;
- Communicating with you or your beneficiaries in relation to their benefits, responding to requests, queries and complaints;
- Communicating with your employer and your independent financial adviser;
- Responding to requests that you make with the Pensions Dashboard Programme or other pensions dashboards providers to find and view the current status and value of your pension (*see Pensions Dashboards section below*).

We also process your personal data where we have a legitimate interest to do so, and we have assessed that our processing will not unfairly impact your data protection and privacy rights. The following processing activities are therefore necessary so that we can pursue our legitimate interests as Trustee of the Scheme:

- Operating, administering and managing the Scheme in an efficient and secure manner, as it is in your financial interest for us to do so;
- Keeping up to date and accurate records about your membership of the Scheme so that the correct benefits can be paid;
- Undertaking risk-management exercises so that the risk of your benefits not being paid is minimised; and
- Improving our processes and use of technology, including testing and upgrading of systems.

We may also process your personal data on the legal basis of one or more recognised legitimate interests. These are interests which are formally recognised in data protection law as lawful processing activities, and include processing of personal data which is necessary for the purposes of:

- detecting, investigating or preventing crime;
- apprehending or prosecuting offenders; or
- safeguarding a vulnerable individual.

We generally do not rely on your specific consent to use your personal data. If you do not provide us with the personal data that we specify is required for the administration of the Scheme or object to our processing your personal data further to our legitimate interests as Trustee of the Scheme, then we may not be able to administer the benefits provided by it.

When we process **special category data** in very limited circumstances, we do so for the lawful basis of carrying out obligations in employment, social security and social protection, and for reasons of substantial public interest including the administration of occupational pensions schemes. In certain circumstances, we may ask for your explicit consent. You can withdraw your consent at any time, and we will let you know if withdrawal of your consent affects what we can do for you.

Sharing your personal data

We may transfer your data to your employer or former employer, or the Baptist Union of Great Britain as the main participating employer in the Scheme and their advisers, for the purposes of assisting us to comply with our legal duties in operating or winding up the Scheme, planning for the future, managing the risks of the Scheme and/or for designing additional options for persons with rights in the Scheme. We may also transfer your data to the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management, governance and administration of the Scheme.

The Scheme's legal adviser is a data controller in its own right. Therefore, where we share your data with them, their use of your data will be governed by the terms of their organisation's Privacy Policy.

In some instances, we may transfer your personal data to regulators, government departments (such as HMRC and DWP), law enforcement, courts, and tribunals.

We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustee, the members of the Scheme, or others.

Marketing

We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

Pensions Dashboards

The Scheme has onboarded to the Pensions Dashboards digital architecture. This is a digital service that will allow users to view all of their pensions within a single dashboard. We are legally required to share certain personal data with the Pensions Dashboards ecosystem for the purpose of matching your details to determine whether you hold benefits in the Scheme and returning information about your Scheme benefits to the Pensions Dashboard.

The data shared for Pensions Dashboards includes your name, date of birth, National Insurance number, contact information, Scheme identifiers, and the value of your benefits in line with Pensions Dashboards Regulations.

International transfers

Your personal data may be processed outside of the UK where required in order for us to provide benefits to or in respect of you. In each instance, we have ensured that there are adequate

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safeguards in place governing the processing of your personal data outside the UK. Further details are available on request.

Retention

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purposes for which it was collected, including administrative, audit and compliance purposes.

To meet this aim, the majority of personal data that we hold will be kept for a period of 15 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you. However, some information may be kept for a longer or shorter period, depending on how long we sensibly think we need it to deal with queries, complaints and our legal obligations.

Automated decision making

The Trustee does not currently use automated processes to make decisions that have a legal or significant effect on you. If we introduce automated decision-making in the future, we will inform you and explain your rights,

Your rights

Data protection law gives you a number of rights:

- to access a copy of the personal data the Trustee holds about you;
- to be provided with information about the way your personal data is processed;
- to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller;
- to restrict the processing of your personal data;
- to object to the processing of your personal data;
- to rectify the processing of your personal data;
- to erase your personal data; and

- to submit a complaint to us about the way we have processed your personal data or in how we have handled a rights request (or if you otherwise think that the Trustee does not comply with data protection law).

You can, save in exceptional circumstances, exercise your rights free of charge.

You can exercise your data protection rights by contacting:

- the Pensions Team on pensionshared@baptist.org.uk or at Baptist House, PO Box 44, 129 Broadway, Didcot OX11 8RT; or
- the Scheme Administrator, Broadstone, on baptistpensions@broadstone.co.uk.

Complaints

If you are exercising your right to complain to us, please indicate that it is a 'data complaint'. We will acknowledge your complaint as soon as possible and within 30 days of receipt and will provide you with a decision or outcome as promptly as possible. If you wish, you may use the Scheme's Internal Disputes Resolution Procedure. There are slightly different rules for processing data complaints but if you submit your concern we will follow the appropriate route.

If you are unhappy with the way in which we have handled any data complaints, you can escalate this to the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.

Changes to this Privacy Notice

The Trustee may update this Privacy Notice from time to time. We will notify you of any changes by publishing the updated Privacy Notice on the Trustee's website and on Broadstone's Engage Members portal, and by referring to the updated Privacy Notice in the next Member Newsletter. This Privacy Notice was last updated on 17 September 2026.