

LPPS TRUSTEE LIMITED
Trustee of the LABOUR PARTY PENSION SCHEME

PRIVACY NOTICE

Use of your personal data

As the Trustee of the Labour Party Pension Scheme (the "Scheme"), we hold and process certain personal information about members and, in some cases, their dependants and beneficiaries. Most of the personal information is 'personal data' (this is information from which individuals can be identified).

For legal purposes, the Trustee is known as the "data controller", as we decide the purposes for and the means by which the personal data we hold is processed.

From May 2018, the law on data protection changed and there are greater legal requirements on individuals and organisations who process your personal data to explain to you what information they are collecting about you and why, how that information will be used and what rights you have. This is called a "privacy notice" and the Trustee's privacy notice is set out below. The privacy notice is available on the member website <https://engage-members.broadstone.co.uk/> and will be updated from time to time. If you can't remember you log on details for the website, please contact the administrator, Broadstone. If you do not have internet access and would like a printed copy of the privacy notice, please write to: Secretary to the Trustee, LPPS, Labour Central, Kings Manor, Newcastle upon Tyne, NE1 6PA.

What information do we collect about you?

Depending on the circumstances and whether you are an active, deferred or pensioner member, we may hold some or all of the following information about you:

- your name and date of birth
- your address
- your national insurance number
- details of your bank account to pay benefits to if you are a pensioner or if we are paying a lump sum to you
- details about your dependants and/or beneficiaries where this is needed so that we can pay benefits following your death
- if you apply to begin to receive benefits on grounds of ill health, medical and other details about your health
- your expression of wishes stating to whom you would like the Trustee to consider paying any lump sum after your death
- if you contact us with any queries, we will keep copies of any correspondence or discussions with you, which may include personal data
- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a "pensions identifier", which is a string of characters used to identify your specific benefits under the Scheme.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HMRC, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been

given your personal data by the member or through enquiries undertaken by us on a member's death. We will not collect any personal data that we do not need.

How do we use that information?

The Trustee needs to hold and process information about you to administer the Scheme and to calculate and pay benefits. This is called a 'legitimate interest' in processing the information.

We also process and retain the personal data about you so that we can:

- comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation; and
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes "matching", where we use personal data that a user has provided to search our Scheme records to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a "possible match".

Personal data relating to the Scheme is held on computer systems and on paper. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. This is known as "sensitive categories of personal data" and it includes information that relates to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

Who do we share it with?

The Trustee is not allowed to share your personal data with other organisations and people, unless the law allows us to or unless you have given your consent. As we need to share information with others to provide you with benefits, there is a legitimate interest in the Trustee sharing this information. We may also need to share it to meet contractual and other legal obligations.

We share personal data with the following:

- Broadstone who is responsible for the day-to-day administration of the Scheme on behalf of the Trustee
- third parties that form part of the "dashboard ecosystem" that enables pensions dashboards services to work, as well as the Scheme's Integrated Service Provider (ISP) (Equisoft), which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem;
- the advisers and printers who help us prepare various communications we send to you;
- the Labour Party/your employer, who may need personal data to assist with employer-initiated projects. The Party may also require data to comply with its own legal obligations as the sponsoring employer;
- the Secretary to the Trustee
- the Scheme's professional advisers, including the actuary, auditor, investment adviser, financial adviser, consultant and lawyers
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- our broker and appointed insurance company for life insurance
- our appointed insurance companies for additional voluntary contributions
- depending upon how we pay pensions and/or lump sums, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) in the UK and/or a payment via Convera when pensions are being paid overseas

- tracing agencies who assist the Trustee and Broadstone with mortality tracing and updating scheme data
- the auditors for calculation checks
- communication specialists for bulk mailings
- third parties who hold the Scheme's data for IT back-up purposes as part of maintaining data security.

We may also share personal data with any prospective insurance company, in the event the Trustee wishes to consider entering into a buy-out/buy-in of any of the benefits under the Scheme,

The Scheme's actuary, auditor and (in certain circumstances) legal advisers are also data controllers in relation to your personal data. This means that they have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. For more information about what personal data they hold about you and how they use it, follow the links:

- Sacker & Partners LLP (legal advisors) – see their privacy notice for pension scheme members, beneficiaries and client's employees at: <https://www.sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees/>
- Aon (Scheme actuary and actuarial team) – see their privacy notice at: <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>

The actuarial team at Aon may share data with their colleagues outside the UK and EEA to process some actuarial calculations. However, in order to maintain data security, the data is 'pseudonomised', accessed via a secure network solution and is stored within the UK and EEA separately to the area where personal data used by the UK client team is stored.

How long do we keep personal data for?

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction. However, as we need to pay your pension benefits and to answer queries relating to your pension, it is necessary for the Trustee to keep some of your personal information for the rest of your life and beyond. We may continue to hold your personal information after all benefits payable to you and your dependants have ceased, in case there are any further queries about your membership of the Scheme.

However, we review the personal data held in relation to the Scheme on a regular basis in accordance with our data retention policy. The Trustee will not retain personal data for longer than is necessary, having regard to the purpose for which it is held. If we conclude that certain personal data is no longer needed, following a review of the information held by the Scheme, that personal data will be destroyed, erased or made inaccessible.

Your rights

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a digital format
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected

- You can require the Trustee to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- You can object to your personal data being processed, although the Trustee can override this objection in specific instances
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- You can request that your personal data is deleted altogether.
- You have the right to complain to the Trustee, to the Information Commissioner’s Office, or to bring an action before the court, if your personal data rights are not complied with (see “Making a complaint to the Information Commissioner’s Office” below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, the ability for you to build up benefits and our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of this notice
- make a complaint about how we have handled your personal data

please contact Sally Corlett, Scheme Secretary (LPPS Trustee Limited, Labour Central, Kings Manor, Newcastle upon Tyne, NE1 6PA).

If you wish to make an amendment to your personal data, please contact the administrator (Broadstone, 23 - 25 St George's Road, Bristol, BS1 5UU).

Making a complaint

If you believe we are processing your personal data in a way which is inconsistent with the law, you can complaint to us using the Scheme’s Data Protection Complaints Procedure (DPCP) and completing the DPCP form. If you would like a copy of the DPCP, please contact Sally Corlett at the address above or by email: sally_corlett@labour.org.uk

If you are not satisfied with our response to any query your complaint, you can complain to the Information Commissioner’s Office whose helpline number is: 0303 123 1113.

Approved by the Governance Committee of LPPS Trustee Limited: 12 August 2026