



CANCER RESEARCH UK PENSION SCHEME

GENERAL PRIVACY NOTICE

The purpose of this notice is to help you understand how we collect and use your personal information, and what your rights are in respect of that information.

Who we are

The Cancer Research UK Pension Trustee Limited is the trustee ("the Trustee") of the Cancer Research UK Pension Scheme ("the Scheme").

As the Trustee of the Scheme, we hold certain personal information (known as "personal data") about Scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

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.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some, or all, of the following information about you:

- your name, age and date of birth
- your gender
- your marital status
- your postal and email address and phone number
- your national insurance number and employee number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including possibly their names, date of birth, gender and physical/mental impairment)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits
- pension and national insurance contribution history
- medical and other details about your health.

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

We gather personal information from a number of sources including the following:

- directly from the individual concerned
- from the current or former employer of a member or former member
- from persons acting as personal representatives of a deceased person's estate
- from a public body such as HMRC
- from public databases such as the Register of Births, Deaths and Marriages
- from schemes where transfers into the CRUK Pension Scheme have been made
- from an independent financial adviser, solicitor or other person instructed by a person to provide us with information
- our advisers or others set out below.
- from third parties used to trace members or beneficiaries with whom we have lost contact
- with your consent, from a registered medical practitioner

from other third parties including, for example, your next of kin or anyone else entitled to benefit from your membership of the Scheme.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also process and retain data:

- to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation.
- 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.

Personal data relating to the Scheme is held on paper and on computer systems. 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 (known as "special categories personal data"). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "special categories of personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

We will only process personal information for the purpose which we have told you about or which are compatible with those we have told you about.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

However, as the Trustee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current, past or future employer which may include group companies which are based outside the EEA. Where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure
- our pensions manager / pension teams at Cancer Research UK
- the Scheme's professional advisers, including the Scheme Secretary (Pi Consulting – see their privacy notice <https://pipartnershipgroup.co.uk/privacy-cookies-policy/>), Scheme Actuary (Mercer- see their privacy notice <https://www.mercer.com/footer/privacy-notice/>), auditor (RSM), investment adviser (LCP- see their privacy notice <https://www.lcp.com/en/third-party-privacy-notice>), lawyers (Sacker & Partners LLP- see their privacy notice for pension scheme members, beneficiaries and client's employees <https://www.sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees/>) and insurance company (Canada Life- see their privacy notice <https://www.canadalife.com/privacy.html> and Standard Life – see their privacy notice <http://www.standardlife.co.uk/privacy>).
- RSM and Mercer have identified themselves as separate data controllers. Mercer and the Scheme Actuary process personal data to provide actuarial calculations and advice requested by the Trustee, to comply with statutory and regulatory obligations and maintain accounts and records. Mercer also uses personal information for data analytics purposes, including creating insights, reports and other analytics to better understand and improve the quality of and market Mercer's advice, products and services. If you require further information from Mercer and RSM please let us know
- Isio Pension Administration (see their privacy notice <https://www.isio.com/triage-privacy/>), the third party who is responsible for the day-to-day administration of the Scheme on behalf of the Trustee
- 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
- the advisers and printers (Howard Hunt) who help us prepare various communications we send to you
- third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, for example the Scheme's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System in the UK and a payment via the administrators' banking providers when pensions

are being paid overseas

- our appointed insurance company or companies for the purposes of life insurance, additional voluntary contributions (including Aegon, Prudential and Utmost) and any insurance company who the Trustees have entered into a buy-in policy with including Canada Life

How long 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), even after benefits have been 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. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life and for a period of time after that.
- However, we review the personal data held in relation to the Scheme on a regular basis. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- **Right of Access** – 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 machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate/wrong, you can ask to have it corrected
- **Right to Restrict processing** – 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
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.
- **Withdrawing consent** – 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.
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or 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 the notice
- make a complaint about how we have handled your personal data

please contact the CRUK Pensions Team using the following contact details:

CRUK Pension Scheme Trustee Limited
2 Redman Place
Stratford
London
E20 1JQ

pensions@cancer.org.uk 0203 469 8403

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is the latest version as at 12 March 2025. This notice will be updated from time to time and you can see the current version at any time at <https://www.cancerresearchuk.org/about-us/our-organisation/cancer-research-uk-pension-scheme>.

Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).