

Privacy Notice

The Church of England Pensions Board

Administration and provision of pensions

We, the Church of England Pensions Board, commit to protecting your personal data. Personal data is any information that can identify you.

This privacy notice explains what you can expect when we collect and process your personal information under the UK and EU General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

1. Data controller

The data controller is the **Church of England Pensions Board**, whose registered address is 29 Great Smith Street, London, SW1P 3PS

The Pensions Board is one of the organisations that make up the National Church Institutions (NCIs). You can find out more about the NCIs at:

www.churchofengland.org/about/leadership-and-governance/national-church-institutions

You can find out more about the Pensions Board at:

www.churchofengland.org/about/leadership-and-governance/church-england-pensions-board

2. Why we collect and use your personal data

We need to collect and hold your personal information to carry out:

1. Pension Administration

- Help employers and Responsible Bodies within the Church meet their duty to provide you with a pension,
- Working out your pension when your employment status changes,
- Calculate your pension and pay you and your dependents,
- Check your identity, eligibility for benefits and your contributions,
- Hold application forms, supporting documents and any identifications such as certificates or passports, to ensure we are paying the correct people,
- Assess your eligibility if you apply for ill-health retirement,
- To trace you if we lose track of you (and your beneficiaries),
- To run mortality and address checks against member records to ensure the information we hold is up to date,
- Communicate with you about your pension, benefits and your contributions,
- Carry out actuarial, statistical and financial calculations for funding and investment advice,
- To meet our on-going regulatory, legal and compliance obligations, including assisting with the investigation or prevention of crime,
- To undertake activities from time to time to help us manage the liabilities of our pension schemes, such as insuring scheme liabilities with an insurer, longevity hedging, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises
- Prepare scheme accounts and help our auditors,

- Pay tax charges and check whether you exceed allowances and prepare reports to HMRC for fraud prevention, and
- As otherwise is required in connection with the general administration of our pension schemes.

2. *Communication*

- To contact you about retirement housing and services.
- To make you aware of services provided by third parties about your pension or retirement which we believe may be of benefit to you.
- To ask you for feedback on our services.
- To contact you about the work of the Pensions Board undertaken on your behalf.
- To share with you contact information of the Retirement Officers with the relevant diocese.

3. *Crockford's Clerical Directory*

- To manage your inclusion in Crockfords publication (as a retired member of the clergy), where you have given consent to Crockfords.

4. *Provision of grants*

- To process applications and assess eligibility for discretionary grants, as funded by the Pensions Board or the Church Commissioners.
- To pay any grants awarded.

3. The categories of personal data we collect

We process personal information about members of our pension schemes and their dependents. This includes members of the Church of England Funded Pensions Scheme (and the pre-1998 scheme), the Church Workers Pensions Fund and Church Administrators Pensions Fund.

The types of information we process include:

Personal details:

- Your personal information such as your name (including former names), date of birth, gender, contact details (e.g. address, phone numbers and e-mail address) and National Insurance number,
- Your employment and/or appointment details, such as the dates you join and leave, any part-time periods or absence, your earnings and your pension contributions,
- Your retirement date,
- Your financial details, such as your tax code, Lifetime Allowance and other protections, your bank details, any housing costs, your savings/assets, and any state benefits,
- Details of your family and social circumstances such as your marriage or civil partnership status, and your wishes as to how you would like us to pay any death benefits,
- Copies of your birth and marriage or civil partnership certificates, death certificate, passport, and deed polls,
- Decree absolute and Court Orders (such as pension sharing, earmarking orders or attachment orders.), and
- Your housing needs, if relevant, and if you wish for us to share these with the Pensions Housing team.

Special categories of information that may include:

- Religious beliefs,
- Sexual orientation through asking for a copy of your marriage or civil partnership status or copies of relevant certificates,
- Information about your physical and mental health if we need it to assess your eligibility for ill-health retirement or details of any disability benefits to support your grant application,
- Criminal allegations, proceedings or convictions.

4. The lawful bases for using your information

We collect and use your personal information under the following lawful bases:

Personal data

- **Consent:** to provide information to insurance brokers and underwriters when insuring benefits; to process applications for charitable and discretionary grants; and/or to process information about any disability benefit you might be in receipt of in connection with your grant application, where applicable.

You have the right to withdraw your consent at any time by contacting the Pensions Administration using the details provided in Section 9 below. This may impact the services we can offer you.

- **Contract:** to comply with the terms of a contract to deliver a service to you e.g. agreement we have with your employer to provide you with pension scheme benefits,
- **Legal obligation:** to comply with pensions and trust law;
- **Legitimate Interest:** In certain instances, we rely on our legitimate interest to process your personal information. These are:
 - to run mortality and address checks against member records to ensure our information is correct and prevent fraud. To do this, we use LexisNexis and you can see how they use your data here -
 - for risk management and research purposes, including insurance or management of longevity risks and getting quotes for annuities or other insurance products,
 - to contact you about a small, select number of third-party organisations that we believe may be of interest to you,
 - to contact you about events or news we believe you may be interested about, and ask you for feedback on our services. If you do not wish to be contacted about such events, please let us know and we will remove your name from our circulation list, and
 - to send 'nudge' emails about topics, benefits and additional services that help you make good retirement decisions.

As set out above, because we consider we have a legitimate interest in processing your personal information, we have undertaken Legitimate Interests Assessments to help us ensure our processing of your personal information for certain purposes is lawful. You can ask us for a copy of the full assessments. *Our contact details are in Section 9 below.*

Legitimate Interest Assessment – 3rd party information

<p>We have a specific purpose with a defined benefit.</p>	<p>Yes, to share information about a service which could be very helpful to a large number of our members, residents, tenants or customers for their information.</p>
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The processing is necessary to achieve the defined benefit.	It benefits the Pensions Board, its members, residents, tenants and customers and the third party organisations to publicise relevant and carefully selected services.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	We will not manage or process requests to use or “opt-in” to any third party service. Instead we will direct members to this service. Individuals have the right to object to receiving such communications again in the future. After we provide the initial information, we will direct members, tenants, residents or other customers who enquire about these additional services to our website (or the third party website), for more information.

Legitimate Interest Assessment – Risk management

We have a specific purpose with a defined benefit.	It is our responsibility to pay all members and beneficiaries benefits when they fall due. We undertake mortality and address checks to ensure we pay the correct people. We may use financial products provided by insurance companies to reduce the risk we do not pay benefits when they are due.
The processing is necessary to achieve the defined benefit.	Mortality and address checks ensure accurate records. If this processing is not done, our records may become inaccurate which could affect our ability to pay the correct people. When putting in place an insurance policy we need to share information with the insurer so we can agree terms.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	We respect the rights of members, balanced with our objective to minimise the risk we do not pay benefits when they are due. There is no risk to member’s rights and freedoms when we run checks to prevent fraud, and to ensure benefits are properly paid. The processing mitigates risks to members.

Legitimate Interest Assessment – Research and Planning

We have a specific purpose with a defined benefit.	We administer pensions on behalf of the Church Commissioners. We supply them with information so they can assess their pension liabilities and manage their assets. We also supply information to the Church’s Statistics & Research department so they can carry out research to inform the Church’s strategic and financial decision making and planning process.
The processing is necessary to achieve the defined benefit.	The information we supply is key to the national Church being able to plan and manage its finances and to assist with policy or strategic planning decisions.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	There is minimal risk to members, and the benefits of policy and financial planning are to the benefit of our members.

Privacy Notice - Legitimate Interest Assessment – Sending nudge emails to members

<p>We have a specific purpose with a defined benefit.</p>	<p>The emails share information and guidance about a range of pension related topics, specifically related to the members' circumstances, to support their planning for retirement.</p>
<p>The processing is necessary to achieve the defined benefit.</p>	<p>The emails are key to the Pensions Board, and its members in publicising options, benefits and additional services that allow members to make decisions that lead to good retirement outcomes.</p>
<p>The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.</p>	<p>Members have the right to object to receiving nudge emails again in the future.</p>

Special category data

- **Explicit consent:** to allow us to use medical information to process ill-health retirements and to process your personal information (including any disability benefits you might be in receipt of) to help with any grant application
- **Substantial Public Interest:** to allow us to process information that may reveal something about your religious belief, as indicated by any title or post you may hold due to your work within the Church where in the substantial public interest, including for insurance purposes or to exercise functions conferred on us by statute
- **Legal claims:** to allow us to process special category data in the exercise or defence of a legal claim or other judicial process.

5. Who we collect from or share your information with

We collect your personal information from a number of sources, including:

- You,
- Your employer or Responsible Body,
- From Clergy payroll (if you are a Clergy member),
- HM Revenue & Customs (HMRC),
- Tracing agencies such as LexisNexis (if we lose track of you), and,
- Your doctor if you apply for ill health retirement (but only with your consent).

If we are unable to collect your personal data by law, or under the terms of a contract you have with us, we may be unable to provide you with services or administer your pension correctly.

In connection with the processing set out in section 2, we share your information with certain third parties, including:

- With our Housing Team colleagues within the Pensions Board who may contact you to manage, and to let you know about, retirement housing (if appropriate) or other charitable services (including Welfare Advice).
- With our advisers and service suppliers who we rely on to help us run our pension schemes. This includes the other National Church Institutions e.g. Finance, Payroll, HR and Crockfords. Once we collect your information it may be used by other NCI's, where necessary and lawful, to provide a

complete service to you. We will link your information together to save you providing your information more than once.

- Insurance and actuarial companies for the purposes set out in section 2.
- With relevant authorities such as HMRC to assess or collect tax or duty.
- Foreign exchange services to pay pensions to overseas bank accounts.
- Customer relationship management systems to email you about services, news and information about your pension.

We will also share your personal information with other third parties at your request. For example:

- If you are considering a pension transfer, we need your permission to provide information to your adviser or the administrators of the receiving pension scheme. In this situation we assume you are satisfied they have suitable security measures in place.
- If you use some of the options available to you, for example you pay Additional Voluntary Contributions or use Ecclesiastical Financial Advisory Services (EFAS) services, we may share your details with the relevant service providers.

We do not use your personal information to carry out any automated decision making.

We do not transfer your personal information outside the United Kingdom, but some of our advisers might transfer your information outside the European Economic Area with our agreement and sufficient protection in line with data protection laws.

6. How long we keep your information.

We will only hold records of your personal information during the period of our relationship with you and for a set period afterwards. In most cases, this set period will be a period of 10 years. This allows us to meet our legal obligations or business needs in line with our corporate retention schedule, which is available on request.

7. Security of your personal data

We commit to ensuring that your personal information is secure. We limit access to personal information on a need to know basis and test our security practices and technologies. We require employees and temporary workers to follow policies and procedures and complete mandatory annual training to understand the importance of protecting personal information and information security.

We have contractual agreements with all our advisers and external suppliers which set out how they keep personal information secure and destroy or return it safely.

If the security of your personal information is breached, we will endeavour to limit the damage. In the case of a high-risk breach, and depending on the circumstances, we will tell you about the breach and any remedial actions to prevent further damage. We will report any qualifying breaches of the security of personal information to the Information Commissioner's Office, or a local privacy regulator (where appropriate).

8. Your rights

Subject to exemptions, you have the following rights:

- The right to be informed about any personal information we collect and use about you;

- The right to access and request a copy of your personal information which we hold about you;
- The right to request that we correct any personal information if it is found to be inaccurate, incomplete or out of date;
- The right to request your personal information is erased where it is no longer necessary for us to keep such information;
- The right to request a restriction is placed on further processing, for example where there is a dispute in relation to the accuracy or processing of your personal information;
- The right to object to the processing of your personal information;
- The right to obtain and reuse your personal information to move, copy or transfer it from one IT system to another. [*only applicable for data held online*]
- The right to withdraw your consent to our processing of your personal information at any time.

To exercise these rights please contact the Data Protection Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

9. Complaints or concerns

If you have any queries about the ways in which we use your personal information and why we do so, please contact the Pensions Administration team in the first instance on:

Tel: 020 7898 1802 (9am - 5pm, Monday to Friday)

Email: pensions@churchofengland.org

If you have any concerns or queries about how the Pensions Board handles your personal information, please contact our Data Protection Officer through our **Data Protection Team** at:

Email: gdpr@churchofengland.org

Tel: 020 7898 1030

Online: www.churchofengland.org/national-church-institutions-data-protection

You have the right to make a complaint at any time to the UK's privacy regulator, the Information Commissioner at:

Online: ico.org.uk/make-a-complaint/your-personal-information-concerns/

Tel: 0303 123 1113

If you are based in the EU, you can lodge a complaint with your local privacy regulator, which is based in the country or territory where you live, work or the alleged infringement took place.