

The College of Law Pension and Assurance Scheme – Fair Processing Notice

1 Introduction

We are the Trustees (“**we, us, our**”) of the College of Law Pension and Assurance Scheme (“**Scheme**”). To make sure you receive your pension and to administer the wider Scheme, we need to collect, use and share your information (“**you**”) and the information of your dependants and nominated beneficiaries. We have contracted Isio Total Reward & Benefits Limited (“**Isio**”) to undertake the administration of the Scheme on our behalf.

The Trustees and Isio are committed to protecting your privacy and acting in accordance with data protection law and operate a strict policy in respect of your personal information.

This Fair Processing Notice (“**Notice**”) explains what information we collect about you, how we use it, who we share it with and how long we retain it.

We have also provided important information regarding your rights in respect of the information we collect about you and how to contact us.

2 We collect a range of information about you

We obtain most of your information from you. We also obtain information from your employer, former employer, other pension schemes, tracing agents, our insurers and insurance brokers, our service providers and our medical advisers. The table below contains more details regarding the information we collect and process about you.

Category	Details	Source
Personal information	<ul style="list-style-type: none">NameGenderDate of birthNational insurance number	You
Contact information	<ul style="list-style-type: none">Home address (including country of residence and postcode)Telephone numberEmail address	You / Target Professional Services (UK) Ltd (tracing agency) / Department for Work and Pensions / Insurers
Professional information	<ul style="list-style-type: none">EmployerCampus/DepartmentRoleRetirement date	You / Your Employer (or former employer)
Bank information	<ul style="list-style-type: none">Account detailsFinancial information	You / Insurers

Benefits information	<ul style="list-style-type: none"> • Member identifying number • Scheme joining and leaving dates • Contributions • Your earnings and pensionable earnings • Scheme category (e.g. deferred member) • Value of contributions and benefits that you receive • Tax protections and other adjustments • Any relevant matters affecting your benefits such as additional voluntary contributions 	You / Trustees / Isio / Insurers / Your employer (or former employer)
Correspondence (including complaints)	<ul style="list-style-type: none"> • Letters and emails from you, us or Isio • Records of other communications 	You / Trustees / Isio / Insurers

2.1 Special Category and Criminal History Data

We collect and process the following 'special category' information about you:

Category	Details	Source
Relationship information	<ul style="list-style-type: none"> • Marital status • Relationship of beneficiary • Marriage and birth certificates • Pension sharing orders (including divorce and dissolution certificates) <p>Note that any relationship information may disclose your sexual orientation.</p>	You / tracing agencies (e.g. LexisNexis and/or Target Professional Services (UK) Ltd)
Health information	<ul style="list-style-type: none"> • Information about ill health causing earlier retirement • Outcomes of ill-health reviews • Incapacity or similar 	You / Medical Professionals / Trustees

If a member should ever owe any money to their employer or former employer because of a criminal act or omission, it is possible we may process data relating to that member's criminal history. No such data is processed by the Scheme's administrators at present.

2.2 Beneficiaries

We collect the following information from you about your nominated beneficiaries, dependants and next of kin:

Category	Details	Source
Beneficiary information	<ul style="list-style-type: none"> • Name • Spouse's date of birth • Contact information • Beneficiary status and entitlement • Bank information • Spouse gender 	You / tracing agencies (LexisNexis (tracing agency) / Target Professional Services (UK) Ltd)

Please be aware that you should provide your beneficiaries, dependants and next of kin with this Notice, before you share their personal information with us.

3 How we use your information for administration of the Scheme and lawful bases

We use your information to provide and administer your pension benefits and for the wider administration of the Scheme. Where necessary, we also use your information to fulfil the Trustees' legal obligations and exercise the Trustees' legal rights in relation to the Scheme.

We must identify a lawful basis for our use of your information. The main lawful basis is that it is in our legitimate interests to ensure the successful operation of the Scheme and that you receive any Scheme benefits to which you are entitled. We also rely on our use of your information being necessary to fulfil our legal obligations as trustees in respect of the Scheme. We are under a legal duty to manage the Scheme on behalf of its members and beneficiaries.

Our main lawful basis for using your information for the wider administration and development of the Scheme are the legitimate interests we have in the ongoing success and stability of the Scheme. We also rely on our legal obligations as pension trustees.

We will only use your information for the purposes of a legitimate interest when there is no unfair impact on you.

Where we use your special category information, we must identify an additional condition. This condition will mainly be consent but we will also use special category information where necessary for a substantial public interest or in the field of social security and social protection law.

The table below sets out in more detail how we use your information and our lawful bases.

Purpose / activity	Information we use	Lawful basis / condition
Record your contributions, track entitlements and pay benefits	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations • Consent
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Consent • Substantial public interest in making a determination in connection with the Scheme
Make payments to your beneficiaries and confirm their entitlement to benefits	<ul style="list-style-type: none"> • Personal information • Professional information • Benefits information • Beneficiary information 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations • Consent
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Consent • Substantial public interest in making a determination in connection with the Scheme
Actuarial valuations	<ul style="list-style-type: none"> • Personal information • Professional information • Benefits information 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations
Audits and statistical and reference exercises	<ul style="list-style-type: none"> • Personal information • Professional information • Benefits information • Beneficiary information 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations • Consent
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Consent

Member tracing including locating you if you move address without providing us with new contact details	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations • Consent
	<ul style="list-style-type: none"> • Relationship information 	<ul style="list-style-type: none"> • Consent
<p>Communicating with you and your beneficiaries in relation to your contributions, entitlements and benefits</p> <p>Communicating with you to provide you with updates about the Scheme and obtain your feedback about its operation</p>	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Benefits information • Beneficiary information • Correspondence 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations • Consent
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Consent
<p>Liability management</p> <p>(including longevity modelling and hedging, bulk transfers, pension increase exchanges, transfer value exercises, bulk annuity transactions)</p>	<ul style="list-style-type: none"> • Personal information • Professional information • Benefits information • Beneficiary information 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Social security and social protection law
Develop and improve the Scheme's systems	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Benefits information • Beneficiary information 	<ul style="list-style-type: none"> • Legitimate interests
Conducting elections and elect trustees	<ul style="list-style-type: none"> • Personal information • Contact information • Benefits information 	<ul style="list-style-type: none"> • Legitimate interests

Preventing and detecting fraud and other crime	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Substantial public interest in preventing and detecting crime • Substantial public interest in preventing fraud
Meeting ongoing regulatory and compliance obligations	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence 	<ul style="list-style-type: none"> • Legitimate interests • Legal obligations
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Substantial public interest
Dealing with any complaints you might make	<ul style="list-style-type: none"> • Personal information • Contact information • Benefits information • Beneficiary information • Correspondence 	<ul style="list-style-type: none"> • Legitimate interests

Bringing and defending legal claims	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence 	<ul style="list-style-type: none"> • Legitimate interests
	<ul style="list-style-type: none"> • Relationship information • Health information 	<ul style="list-style-type: none"> • Establishment, exercise or defence of legal claims
Management of our internal systems processes and our use of technology, including testing and upgrading of systems	<ul style="list-style-type: none"> • Personal information • Benefits information • Beneficiary information 	<ul style="list-style-type: none"> • Legitimate interests

4 Disclosure of your information to third parties

To provide your benefits and administer the Scheme, we work with a number of external service providers and third parties, including Isio. We have contracts in place with service providers restricting how they can use your information.

In addition to sharing your information for the purposes of providing your benefits and administering the Scheme, we may have to share your information with official authorities such as the Pensions Regulator and the Pensions Ombudsman. We may also share your information where necessary for the restructuring or reorganisation of the Scheme.

Further information about what information we share with service providers and third parties is included in the table below.

Service provider / third party	Purpose	Information shared
<ul style="list-style-type: none"> • Isio 	<ul style="list-style-type: none"> • Scheme administration • Employment • Audit • Corporate transactions 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information
<ul style="list-style-type: none"> • Intellipay / Intellipen (software providers) 	<ul style="list-style-type: none"> • Scheme administration • Payroll 	<ul style="list-style-type: none"> • Benefits information • Beneficiary information
<ul style="list-style-type: none"> • Isio internal print room / Paragon (printing) 	<ul style="list-style-type: none"> • Printing services 	<ul style="list-style-type: none"> • Correspondence • Relationship information

		<ul style="list-style-type: none"> • Health information
<ul style="list-style-type: none"> • BDO LLP 	<ul style="list-style-type: none"> • Auditors 	<ul style="list-style-type: none"> • Personal information • Professional information • Benefits information • Beneficiary information • Relationship information • Health information
<ul style="list-style-type: none"> • Isio 	<ul style="list-style-type: none"> • Actuarial services 	<ul style="list-style-type: none"> • Personal information • Professional information • Benefits information • Beneficiary information • Relationship information • Health information
<ul style="list-style-type: none"> • Baker Tilly Mooney Moore 	<ul style="list-style-type: none"> • AAF01/20 internal controls testing 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Correspondence • Relationship information • Health information
<ul style="list-style-type: none"> • Financial advisers (if you have opted to receive financial advice) • Other pension plans 	<ul style="list-style-type: none"> • Financial services 	<ul style="list-style-type: none"> • Personal information • Professional information • Benefits information • Beneficiary information

		<ul style="list-style-type: none"> Relationship information Health information
<ul style="list-style-type: none"> Insurers / Aviva / Legal & General / Prudential To Buy-in insurers 	<ul style="list-style-type: none"> Insurance and reinsurance services Scheme administration 	<ul style="list-style-type: none"> Personal information Contact information Professional information Bank information Benefits information Beneficiary information Correspondence Relationship information Health information
<ul style="list-style-type: none"> Your current employer 	<ul style="list-style-type: none"> Transferring you to another Defined Benefit scheme, at your request. 	<ul style="list-style-type: none"> Personal information Contact information Professional information
<ul style="list-style-type: none"> Aegon / Standard Life 	<ul style="list-style-type: none"> Additional voluntary contributions 	<ul style="list-style-type: none"> Personal information Contact information Professional information Benefits information Beneficiary information
<ul style="list-style-type: none"> Aviva / Legal & General, Prudential / Canada Life 	<ul style="list-style-type: none"> Bulk or individual annuity policies 	<ul style="list-style-type: none"> Personal information Professional information Benefits information Beneficiary information
<ul style="list-style-type: none"> Public authorities, regulators or government bodies including HM Revenue & Customs and the Department for Work & Pensions. 	<ul style="list-style-type: none"> Regulatory and compliance 	<ul style="list-style-type: none"> Personal information Contact information Professional information Bank information Benefits information Beneficiary information Correspondence

		<ul style="list-style-type: none"> Relationship information Health information
<ul style="list-style-type: none"> SmartSearch (provider of anti-money laundering services) Bottomline (PT-X Verify) (provider of bank account validation and verification services) 	<ul style="list-style-type: none"> Preventing and detecting fraud and other crime 	<ul style="list-style-type: none"> Personal information Contact information Professional information Bank information Benefits information Correspondence Relationship information Health information
<ul style="list-style-type: none"> The Pensions Ombudsman / The Money and Pensions Service 	<ul style="list-style-type: none"> Complaints 	<ul style="list-style-type: none"> Personal information Benefits information Beneficiary information Correspondence Relationship information Health information
<ul style="list-style-type: none"> LexisNexis / Target Professional Services (UK) Ltd (Tracing agencies) 	<ul style="list-style-type: none"> Locating you where your contact details are not up to date Confirmation of your continuing entitlement to benefits 	<ul style="list-style-type: none"> Personal information Contact information
<ul style="list-style-type: none"> Beneficiaries 	<ul style="list-style-type: none"> Beneficiary payments 	<ul style="list-style-type: none"> Personal information Benefits information Beneficiary information
<ul style="list-style-type: none"> Isio Group Limited 	<ul style="list-style-type: none"> Accounting software 	<ul style="list-style-type: none"> Personal information Contact information Professional information Benefits information
<ul style="list-style-type: none"> Isio Group Limited 	<ul style="list-style-type: none"> Payroll software 	<ul style="list-style-type: none"> Personal information

		<ul style="list-style-type: none"> • Contact information • Professional information • Bank information • Benefits information • Beneficiary information
<ul style="list-style-type: none"> • Isio Group Limited 	<ul style="list-style-type: none"> • Data and records management 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence • Relationship information • Health information
<ul style="list-style-type: none"> • Isio Group Limited 	<ul style="list-style-type: none"> • Communications software 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence • Relationship information • Health information
<ul style="list-style-type: none"> • IT providers 	<ul style="list-style-type: none"> • IT systems and support 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information

		<ul style="list-style-type: none"> • Beneficiary information • Correspondence • Relationship information • Health information
<ul style="list-style-type: none"> • Hymans Robertson LLP (professional advisers) 	<ul style="list-style-type: none"> • Investment consultancy advice • Covenant advice 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence • Relationship information • Health information
<ul style="list-style-type: none"> • Linklaters LLP (professional advisers) 	<ul style="list-style-type: none"> • Legal advisers 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Benefits information • Beneficiary information • Correspondence • Relationship information • Health information
<ul style="list-style-type: none"> • Third party pension providers to whom you ask us to disclose your information 	<ul style="list-style-type: none"> • Transfer of your pension to another provider 	<ul style="list-style-type: none"> • Personal information • Contact information • Professional information • Bank information • Beneficiary information

		<ul style="list-style-type: none"> • Benefits information • Correspondence • Relationship information • Health information
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5 Transfer of your information outside the UK and the European Economic Area (EEA)

The use and disclosure of your information, including for the purposes of liability management or by Isio or the Scheme’s actuary, may in certain cases involve transferring your information to countries outside of the UK and in certain cases outside of the EEA also (e.g. where our service providers carry out certain functions outside the EEA).

Additionally, if you are based outside the UK, we will transfer your information outside of the UK in order to pay you. If you are based outside the EEA (and UK), we will similarly transfer your information outside of the EEA (and UK) in order to pay you. Additionally, we will transfer your information outside the UK (or EEA, as applicable) in order to trace you if we lose contact with you, and to confirm your continuing entitlement to benefits. We will also transfer your information outside the UK (and EEA, as applicable) if you ask us to transfer your information to an overseas pensions provider. We do this because you have consented to this disclosure to allow us to make such overseas payments or because we have taken other measures to ensure that we continue to protect your information. Please contact us at the address set out below if you want more details.

The EEA is recognised by the Information Commissioner as ensuring an adequate level of data protection. Transfers of data from the UK to the EEA do not require additional arrangements.

However, when we transfer your information to service providers or third parties based in countries not recognised as providing an adequate level of data protection, we ensure that the transferred information is protected in compliance with UK GDPR, for example by putting in place a data transfer agreement in the appropriate standard form approved for this purpose by the Information Commissioner. Further details of these transfers including information about any data transfer agreements we use are available from us on request at the address below.

6 Retention of your information

We keep your information for the longer of: (a) the period required in order to meet our legal or regulatory responsibilities, and (b) the period envisaged within our record retentions policy. We determine the period envisaged within such documentation with regard to the Scheme’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 Scheme, and responding to legal claims or regulatory requests.

Unless required by legal obligations, we will retain your information for the following periods:

- (i) On-going schemes – information is held indefinitely, but subject to review after 20 years;
- (ii) Wind-up and merged schemes – information is held indefinitely, but subject to review after 20 years; and

- (iii) After transfers out to external schemes or arrangements – information is held for a period of 8 years from when our engagement ceases, and then deleted. Before this information is deleted, we generally issue a letter to the third party that received your information, to inform them of our actions.

7 Your rights over your information

You have the right to:

- **Access** your information
- **Object** to the use of your information
- **Erasure** of your information
- **Portability** of your information to other organisations
- **Correct and update** your information if it is inaccurate
- **Restrict** our use of your information while any concerns you raise are resolved
- **Complain** to your supervisory authority
- **Withdraw** your consent

Please be aware that these rights are not absolute and there are situations where they cannot be exercised or they are not relevant.

If you have any concerns about our use of your information, you also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113. Details for the office of the Information Commissioner in the UK are available at www.ico.org.uk.

If you are not based in the UK, you have a right to complain to the EU Data Protection Authority ("DPA") in your jurisdiction. If you would like to be directed to the appropriate DPA, please contact us.

8 Other matters

This Fair Processing Notice was updated on 19 July 2023. It is non-contractual. We reserve the right to amend it from time to time, and will take appropriate steps to bring any such amendments to your attention.

To contact us about the matters set out above, please contact us:

By email: collegeoflaw@isio.com

Or by registered post:

Pensions Administration Team
c/o Isio Total Reward and Benefits Limited,
PO BOX 4916
Interface Business Park, Swindon, SN4 4RX