

MEMBER PRIVACY NOTICE

FROM THE TRUSTEE OF THE CREST NICHOLSON GROUP PENSION AND LIFE ASSURANCE SCHEME (THE "SCHEME")

Summary:

- We care about your data and privacy, and seek to ensure that we look after any personal data you provide us or that we may hold. We will never sell your personal data.
- We are here to administer your pension benefits and ensure that when you come to retire, it is a smooth and seamless transition for you.
- We will not direct market to you or try to sell you any other services.
- Any personal information you give us or that we ask you for, will be used to help support your enquires and our relationship with you, such as:-
 - sending you information you request about your benefits
 - sending you up to date AVC statements
 - processing your retirement or transfer out requests
- We will only keep your data for as long as we need it and/or where required by law.
- We take data security seriously and have a range of measures to help keep your personal information secure.
- Your data may be accessible outside of the EEA but we will ensure the same data protection safeguards are in place as if it were inside the EEA
- You can ask us any time about our privacy practices.

Please read the rest of this Privacy Notice to learn more about what personal information we collect, use, share and why. We also summarise how we protect that information.

Please don't hesitate to [contact us](#) if you have any questions or concerns.

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WHO WE ARE

The Scheme is a registered pension scheme (Registration number PSR10011371). If you have been contacted by us, we believe you to be either a deferred or pensioner member of the Scheme.

You may have known the Scheme by one of the former scheme names listed below:

- Camper & Nicholson's (Holdings) Pension Scheme
- Crest Homes Limited Pension Scheme
- The Lamson Engineering Co Ltd Pension and Life Assurance Scheme
- The Lamson No 1 Pension Plan
- Pearce Group (1976) Retirement Benefits Scheme

When we say 'we' or 'us' or 'our' we mean the Scheme's Trustee, Crest Pension Trustee Limited (see our registration with the UK data protection regulator, the ICO Registration number Z5514344), which acts as Data Controller.

Our actuaries, XPS Pensions Limited, including our individual Scheme Actuary, are classed as joint data controllers with the Trustee when providing certain actuarial and consultancy services. You can view XPS Group's privacy policies at <https://www.xpsgroup.com/privacy-policy/>.

The Trustee will only use your information to administer your pension and the Scheme and help support your enquiries and our relationship with you.

WHAT KIND OF PERSONAL INFORMATION WE COLLECT ABOUT YOU

The kind of information we collect and use about you will vary depending on how long you have been a member of the Scheme. We hold any or all of the following personal information about you:

- personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number and identifiers such as your national insurance number; and
- family, lifestyle and social circumstances such as details about current marriage and partnerships and marital history, details of family and dependents; and
- Where you have applied for an ill health early retirement we will hold a description of your physical or mental health; and
- employment details such as pensionable pay, length of service, employment and career history and termination details, attendance record, job title, financial details such as salary, investments and bank account details to process pension payments.

You may also hear the term "personal data" being used, and this means information that relates to you as an identifiable individual.

Crest Nicholson, who host the Scheme's website, and XPS Pensions Group, who host the Scheme's member portal, also capture information about how people use their websites. This will involve placing a cookie onto your computer (or smart device) which will automatically collect standard internet and website information, for example pages you've viewed and any account preferences. They may receive information about the device you are using, such as the browser or IP address. Please see below for further information:

- Crest Nicholson's [Cookie policy](#) and [Privacy policy](#).
- XPS Pensions Group's [Cookie policy](#) and [Privacy policy](#).

WHEN AND WHY WE USE YOUR PERSONAL INFORMATION

We collect personal information **directly from you** when you:

- send us a letter or email
- call us
- complete retirement or transfer out forms
- send us instructions in respect of your additional voluntary contributions
- complete questionnaires
- applied for membership

We may also **indirectly obtain** information from third parties when we:

- lose touch with you and use a tracing service to find you. Please be reassured that the traces we use do not leave a record of our search;
- contact your current or former employer or government departments such as HMRC or DWP;
- are contacted by anyone entitled to benefit under your membership of the Scheme (e.g. a relative).

We will use your personal information for a number of purposes including the following:

- to ensure that the personal information we hold about you is up to date and correct;
- to update the actuarial data used to value the Scheme's assets and liabilities;
- to administer the Scheme including to process data to calculate and pay benefits;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- in relation to any correspondence (including queries relating to your membership of the Scheme) related to the administration of the Scheme;
- for statistical, financial modelling and reference purposes;
- for internal record keeping, including member tracing or pension existence checks;
- risk management including credit risk analysis and the insurance of longevity risks and related demographic risks;
- complying with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
- in connection with any sale, merger, acquisition, disposal, recognition or similar change of the Employer's business;
- in connection with a de-risking project, such as a Scheme Buy-Out;
- to analyse and improve the activities, services and information offered by the Scheme; and
- to send you updates and information about the Scheme.

OUR LEGAL BASIS FOR USING YOUR INFORMATION

In most cases our legal bases for processing are that it is either necessary in our legitimate interest to use your personal information for the purposes of administering the Scheme in order to pay your, and other members' benefits, or we do this to comply with our own legal requirements.

RETAINING YOUR INFORMATION

Your personal information is stored by us and/or our service providers strictly to the extent necessary for the performance of our obligations, and for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws and our information retention policy. In the context of providing pension benefits, this period is extensive. We will typically store your personal information for the life

of the Plan (or, in the event that the Plan were to wind up, for 15 years after such time). Retention of your personal information enables us:

- to process and pay your benefits and benefits that may be payable after your death;
- to respond to queries from members or your beneficiaries about your correct benefit entitlement, which may be received many years after members have transferred out or taken a refund of contributions or made elections to change their benefits;
- to correct or uplift benefits if circumstances come to light that require this, potentially long after members have drawn their benefits or left the Plan; and
- to respond to legal claims.

When we no longer need to use your information, we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

PEOPLE WHO MAY PROCESS YOUR PERSONAL INFORMATION IN SUPPORT OF THE SCHEME

Your personal information may be received and processed by:

- Secretarial support staff provided by Crest Nicholson – it's not all done by computers alone.
- third party data processors who provide support services to us and/or Crest Nicholson and who will process your personal information on our behalf. Such third parties may include cloud services providers (such as hosting and email management) or other IT service providers, as well as XPS Administration Ltd, who looks after the Scheme on our behalf.
- Joint data controllers who provide actuarial and consultant services to us and who will process your personal information on your and our behalf.
- We have a duty to hold accurate and up to date contact details for all our members. If we lose touch with each other, we will use Tracing services to find you.
- Participating employers in the Scheme (but your information will only be shared with these entities to the extent that it is necessary for the administration of your pension benefits).
- parties that we have a legal obligation to disclose information to.
- If your benefits are transferred to another scheme, we will also need to give the administrators of that scheme information about you.

SECURITY – KEEPING YOUR INFORMATION SAFE

We have adopted a range of technical and organisational measures to help ensure your personal information is kept safe and secure. We also take steps to ensure any third party that provides services to us – such as hosting personal information on servers – also take steps to protect any personal information they process on our behalf.

YOUR PERSONAL INFORMATION AND THE EEA

In limited circumstances, such as when data processors located outside the EEA are required to access data stored within the EEA in order to support the administering of your benefit, your personal information may be accessed, transferred, and/or stored, outside the European Economic Area (**EEA**) in which data protection laws may be of a lower standard than in the EEA. Regardless of location we will impose the same data protection safeguards that we deploy inside the EEA.

YOUR RIGHTS AND CHOICES OVER YOUR PERSONAL INFORMATION

U.K. Data protection law gives you a number of rights over your personal. Please see below for an explanation of your rights.

Please notify us of any changes to the personal information that you have provided to us by contacting us using the details below.

You can contact us at any time by post or email:

- Crest Nicholson Pension Trustee Limited, Crest House, Pycroft Road, Chertsey, Surrey KT16 9GN
- sending an email to pensions@crestnicholson.com (please remember email is not a secure way of communicating sensitive information)

Right to know and right to access

You can ask us if we are holding and using information relating to you and if we are, to ask us:

- why we're processing your personal information
- the categories of information we process about you
- the recipients or categories of recipients of your information (and if outside the EEA the derogations or safeguards relied upon)
- how long we keep your information or the criteria we use to determine how long we need to keep it
- for a copy of personal information we hold about you

Right to rectify

You can ask us to rectify inaccuracies in your personal information. You can also ask us to complete personal information considered incomplete or to record a supplementary statement.

Right to erasure

In some circumstances, you can ask us to erase personal information we hold about you. This includes when:

- the information is no longer necessary in relation to the purpose for which it was collected or is otherwise used by us
- if you previously gave consent to the use of your information, but decide to withdraw it and we cannot justify another ground for using it
- we process your information based on our legitimate interests and we cannot demonstrate overriding legitimate grounds to continue processing the information
- we don't have a lawful ground under data protection law to process your information
- the information has to be erased to comply with a legal requirement

Right to restrict processing

You have the right to ask us to 'restrict' (block or suppress) the processing of your personal information when:

- you dispute the accuracy of the information (while we verify matters);
- the processing is unlawful, and you object to the erasure of the information and request that we restrict processing instead;
- we no longer need the information, but you require it to establish, exercise or defend a legal claim; and/or
- we process your information for our legitimate business interests but you object and while we verify the grounds for continued processing

Right to Data Portability

You have the right to receive personal information you provide to us, in a 'commonly used machine-readable format':

- when processing is based on your consent or for the performance of a contract, and
- when the information is processed by solely by automated means

Right to object

Based on your particular situation, you can object to the processing of your personal information, that is:

- based on our legitimate business interests (including profiling)
- done for research and statistical purposes

You also have the right to object to the use of your personal information for direct marketing purposes (including profiling).

Right to withdraw consent

When we rely on your consent to process your personal information – such as for sensitive information such as information about your health – you have the right to withdraw your consent at any time. We'll always strive to make it easy for you to withdraw consent, and if you find this isn't the case, then just email us as per below, and we'll try to fix things ASAP. Occasionally, where it is not possible to obtain your consent, we may process this sensitive information which we receive from third parties where this is necessary for the purposes of carrying out our legal obligations or exercising our (or your) specific rights under employment, social security and social protection law, or where this is necessary to protect your vital interests.

RIGHT TO LODGE A COMPLAINT WITH THE UK REGULATOR

UK data protection and privacy law is overseen by the [Office of the Information Commissioner](#) (the 'ICO'). If you are dissatisfied with how we handle your personal information under UK data protection law, or how we respond to your rights, you can lodge a complaint with the ICO. See www.ico.org.uk for more information.

We would ask that you give us the opportunity to resolve your complaint before contacting the ICO. Please see our contact details below.

CONTACTING US

You can contact us at any time about how we use your personal information or to exercise any of your rights set out under 'Your rights and choices over your personal information'.

You can contact us by post or email us:

- Crest Nicholson Pension Trustee Limited, Crest House, Pyrcroft Road, Chertsey, Surrey KT16 9GN
- sending an email to pensions@crestnicholson.com (please remember email is not a secure way of communicating sensitive information)

This notice was last updated on 23 February 2023