

Privacy Notice: Yorkshire and Clydesdale Bank Pension Trustee Limited

Yorkshire and Clydesdale Bank Pension Trustee Limited is the trustee (the "Trustee") of the Yorkshire and Clydesdale Bank Pension Scheme (the "Scheme").

We gather, hold and use personal information (also known as personal data) relating to members and former members of the Scheme, their family and dependants. We need that information for the purposes of administering the Scheme, paying benefits and managing liabilities and also for internal statistical, financial modelling and reference purposes (eg when we assess how much money is needed to provide members' benefits and how that money should be invested). Without such information, it may be impossible for some benefits under the Scheme to be paid.

We are committed to protecting and processing fairly and lawfully the personal information we gather, hold and use. This Privacy Notice explains how we do this.

This Privacy Notice is the latest version as at April 2024. This Privacy Notice will be updated from time to time and you can see the current version at any time on the secure member portal at: www.ycbps.co.uk. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know.

Where you have provided us with personal data about other individuals, such as family members or your other dependants, please ensure that they are aware of the information contained within this notice.

1 About us

1.1 As noted above we are the Trustee of the Scheme.

1.2 For the purposes of data protection laws, we are the 'controller' of the personal information we gather, hold and use about you, your family and other dependants as we decide the purposes for and how the personal information we gather and use is processed.

2 Your privacy rights

You have a number of legal rights in relation to the personal information we hold about you, including:

Access to your personal information - you can request access to a copy of the personal information that we hold about you. You can make a request by contacting the Secretary to the Trustee whose details are set out at section 10 below. Please make all requests in writing. You may be asked for evidence of your identity. Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances. Exemptions may apply in some particular circumstances.

Right to withdraw consent - if you have given us your consent to use personal information, you can withdraw your consent at any time. However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for us to continue processing your personal data where this is justified.

Rectification - you can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure - you can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. However, we can override this in certain circumstances.

Restriction - you can ask us to restrict the personal information we use about you in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.

Right to object to processing – where 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

Make a complaint - 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**. The details for the ICO's website are **ico.org.uk**.

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.

3 The kinds of personal information we gather and use

3.1 We use different types of personal information depending on a person's circumstances at the time. This may include some or all the following information about you, your family and other dependants:

name and date of birth, gender, status – whether single, married, in a civil partnership or other relationship akin to marriage or civil partnership, postal address, telephone number and email address, Cookie id, IP address, national insurance number, employee and/or scheme number, tax details, details of bank account for the purpose of paying benefits, details about your dependants and/or beneficiaries (including their names and possibly details of their gender), relevant employment information (including current and past salary information and employment dates) and details about pension benefits.

3.2 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 of personal data'). See section 6.2 below for further details.

4 How we gather your personal information

4.1 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 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 in section 7 below.

5 How we use your personal information

- 5.1 Personal information must only be used for the purpose or purposes for which it is collected. The main purpose for which we gather, hold and use personal data is so that we can properly administer the Scheme, by ensuring that benefits are calculated correctly and paid to or in respect of the right person. In addition, as noted above we use personal data for internal statistical, financial modelling and reference purposes and to manage liabilities.
- 5.2 We may, subject to compliance with the data protection laws, process personal information for another purpose if that purpose is compatible with the purposes referred to in section 5.1 above.

6 Our legal basis for using your personal information

6.1 We use personal information:

- to comply with our legal obligations under the documents governing the Scheme and legislation governing the operation of pension schemes;
- where we have a legitimate interest in holding and processing personal information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits.

Although you can object to processing on this ground, this objection can be overridden where there are compelling reasons (eg because we need to process personal information to meet our legal obligation to pay benefits).

- 6.2 Where special categories of personal information are processed, such as information about an individual's health or information about a criminal conviction if this has resulted in an individual owing money to an employer or former employer and that employer may be reimbursed from the person's benefits, further legal grounds apply in order for us to process the data, including:

- 6.2.1 where you have given your explicit consent
- 6.2.2 by relying on provisions set out in data protection laws permitting the processing of special categories of personal data, such as where such processing is in connection with employment, social security and social protection
- 6.2.3 where you have made the special category of personal information manifestly public
- 6.2.4 where the information is required to establish, exercise or defend legal claims.

Where we have your consent, you have the right to withdraw it as noted in section 2.2 above. We will let you know how to do that at the time we gather your consent.

7 Sharing your personal information with others

7.1 We share personal data we hold with the following

- personnel in the Bank's Group Pensions Department for many reasons such as checking benefits, eligibility for certain benefits, dealing with day to day queries
- the Bank and other Group employers (and potential purchasers of any part of the Group's business) so that they can understand their liabilities to the Scheme, notify you of your scheme options and implement liability management exercises and for any other purpose for which the Group has a legitimate interest in processing Scheme personal data;
- the Scheme's professional advisers, including the Scheme actuary, actuarial advisors, auditor, medical advisers, investment advisers, benefit consultants and lawyers
- financial advisers appointed to give you advice about your pension options
- the administrators, who are responsible for the day-to-day administration of the Scheme
- the advisers and printers who help prepare various communications which are sent to members and others
- appointed providers of life insurance and additional voluntary contributions
- tracing bureaus for mortality screening and locating members and other beneficiaries
- depending upon how pensions are paid, organisations to whom personal data is sent to effect pension or other benefit payments whether in the UK or overseas
- Government and regulatory bodies (we can be fined and subject to other action if we fail to provide certain information to certain authorities)

- UK courts for the purposes of processing pension sharing orders
- 7.2 Insurance companies and other organisations for the purposes of liability and risk management exercises. In addition, where we make investments or seek to provide benefits for members in other ways, such as through the use of insurance, then we may need to share personal data with providers of investments, insurers and other pension scheme operators.
- 7.3 Some of the organisations referred to in sections 7.1 and 7.2 will simply process your personal data on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal data that we share with them. When we share personal data with the Bank or other Group employer, the Bank or other Group employer will be responsible to you directly for their use of personal data that we share with them. Further information is provided in Appendix 1 by the Bank about how the Bank uses the personal data shared with us.
- 7.4 The Scheme actuary is a “controller” for data protection purposes. Details of the actuary’s privacy notice can be found at <https://www.willistowerswatson.com/en-gb/notices/How-Willis-Towers-Watson-uses-personal-data-for-actuarial-services-to-UK-pension-scheme-trustees>
- 7.5 Zurich Assurance Ltd and Pacific Life Re International Limited will each act as “controller” in respect of personal data of certain members/beneficiaries of the Scheme in order to provide insurance services to the Trustee. More information about how these companies process personal data and your rights in respect of that processing can be found on Zurich Assurance Ltd’s privacy notice (available at [Fair Processing Notice | Zurich Insurance UK](#)) and Pacific Life Re International Limited’s privacy notice (available at [Privacy and other policies | Pacific Life Re](#))

8 Transfers of personal data

Any transfer of your personal data must be done securely and consideration is always given to the most secure and efficient way of doing this such as the anonymisation of Scheme personal data.

9 International transfers

- 9.1 We or the entities outlined above may need to transfer data to other countries outside of the United Kingdom from time to time. Unless the country to which the data is to be transferred ensures an adequate level of protection for personal information (as assessed by the UK authorities), we (or the relevant entity) will put in place safeguards in line with the recommendations of data protection legislation. In particular, such transfers will generally be made based on the UK international data transfer agreement or, where relevant, the EU Commission’s standard contractual clauses.
- 9.2 Parties with whom we share data must inform us of any processing of personal information outside of the EEA.

10 How long we keep your personal information for

10.1 We must keep all personal information safe and only hold it for as long as necessary. Given the nature of pension schemes, we will keep relevant personal information for as long as required to meet the purposes for which it was collected. In practice, this means for the life of the member, or the life of the last remaining beneficiary associated with the member, plus 7 years.

10.2 We review the types of personal information we hold in relation to the Scheme every three years. If the decision is taken that certain personal information is no longer needed, the personal information will generally be destroyed, erased or made inaccessible.

11 Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned at section 2 above
- make a complaint about how we have handled your personal data

please contact the Secretary to the Trustee, care of Capita Employee Benefits, PO Box 555, Stead House, Darlington, DL1 9YT

September 2024

Clydesdale Bank: Privacy Notice to Members of the Yorkshire and Clydesdale Bank Pension Scheme

Clydesdale Bank PLC ("Clydesdale", 'the Bank', 'we' or 'us') take your privacy seriously. This Privacy Notice describes how we collect, use and share Personal Information about you, as a member of the Yorkshire and Clydesdale Bank Pension Scheme. If you are also an existing employee, this Privacy Notice applies in addition to the CYBG Colleague Fair Processing Notice.

Your privacy rights and protections are set out in the above privacy notice issued by Yorkshire and Clydesdale Bank Pension Trustee Limited ('the Scheme'). Clydesdale Bank PLC is a separate 'data controller' from the YCB Scheme – this means that we may use the same personal information about you as the YCB Scheme, but we take decisions about how that personal data is used separately from the YCB Scheme.

We will gather, use and share your personal data in relation to the Scheme as follows:

- the personal data we share is 'pseudonymised', which means that we can still identify you from it but certain criteria such as your name and address has been removed from the data set for additional security – the pseudonymised personal data we use includes unique identification numbers, dates of birth and pensions amounts.
- we gather and share personal data from and with the Scheme, and its services providers and advisers, where necessary to either carry out pension liability management or contact you as a member to tell you about options under your scheme – it is in our legitimate interests to carry out such liability management and options exercises.

we gather, share and use personal data with:

- the Bank's professional advisers, including the Bank's actuarial advisors, auditor, medical advisers, investment advisers, benefit consultants and lawyers.
- appointed providers of life insurance and group income protection
- financial advisers appointed to give you advice about your pension options
- the advisers and printers who help prepare various communications which are sent to members and others
- the Government and regulatory bodies (we can be fined and subject to other action if we fail to provide certain information to certain authorities)

We do not, for these purposes:

- gather, share or use any 'special category' or 'sensitive' personal data;
- carry out any automated processing of personal data; or
- transfer any personal data outside the EEA

We keep your personal data as a Scheme member securely and we will never retain your personal information for any longer than is necessary for the purposes we need to use it for. Generally, we keep information relating to pensions for a period of 15 years from expiry of the pensions account, but in some cases we may need to keep this information for a longer period where necessary for legal reasons

The rights you have in respect of our use of your personal data are the same as the rights set out in Section 2 of the above Scheme privacy notice. If you would like to exercise any of your rights, or make an enquiry or complaint about our use of your personal data, please contact our DPO team at: CYBG.data.protection.officer.queries@cybg.com.