

The Condé Nast Publications Limited Retirement Benefits Scheme - Privacy Notice

This Privacy Notice has been issued by the Trustees of The **Condé Nast Publications Limited Retirement Benefits Scheme** (the Scheme) to comply with the General Data Protection Regulation (GDPR).

This notice is intended to provide you with information about the personal data held about you which is needed to administer the Scheme and pay benefits from it. It explains the type of information collected, how it is used and who it is shared with.

Data controllers

For the purposes of data protection law and regulation, the Trustees of the Scheme are “data controllers” (the holders, users and processors of personal data).

The Scheme Actuary, **Rachel Banham of Lane Clark & Peacock LLP**, is also a data controller in respect of your personal data that she uses to carry out her functions. For further information please see <https://www.lcp.uk.com/privacy-policy/>.

It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Scheme’s auditor or legal advisers.

Use, transfer and storage of personal data

In the course of running the Scheme, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner’s) health. Such information will be used by the Scheme’s administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Scheme).
- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Scheme).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the Trustees by the principal and/or participating employer of the Scheme or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Scheme. We will keep your personal information for as long as we have a relationship with you or your dependents. When deciding how long to keep your personal information after that relationship ends, we take into account our legal obligations and regulators’ expectations.

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The Trustees share your data with the Scheme's administrator currently LCP, the Scheme Actuary, the sponsoring employer and AVC providers. They may also share data with the Trustees' other professional advisers (including the legal adviser, Scheme Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions the Pensions Protection Fund and the Pensions Regulator). We have measures in place to protect your data and when sharing your personal data with the administrator or another third party we will make sure that they too have appropriate measures in place to protect your data.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive.

The Scheme administrators, on behalf of the Trustees, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustees' **legal obligation** to run the Scheme in accordance with the Trust Deed and Rules. The Trustees and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustees' **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Scheme so that the correct benefits can be paid
- Undertake risk-management exercises so that the risk your benefits are not paid is reduced
- Comply with the law, including regulations and guidance issued by the Pensions Regulator so that you, the Trustees and their advisers are not subject to legal sanctions which may impact benefits
- Efficiently manage the impact of any change to the legal status of the sponsoring company so that your benefits are not adversely affected for example by a sale or company merger

In certain circumstances your personal data may be processed in countries outside the European Economic Area (EEA), which are not covered by the GDPR. For example, third party providers may store certain data in a country outside the UK and the EEA. In such circumstances we will ensure appropriate safeguards are in place in accordance with the applicable laws. Further details on the steps we take to protect your personal data in these cases are available from the Data Controller at the address above.

Pensions dashboards

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in a single, secure place. As part of this, we were required by law to connect to the pensions dashboard architecture which involved preparing our member data so that our systems would connect to the ecosystem. As part of the dashboards, we are receiving information about individuals and matching it against the data we hold about members on our systems (to verify if a person has a pension with us). Once a match has been achieved, we will be making certain pensions data available to the specific individual.

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In light of a 'possible match' we may carry out further data processing to verify whether you have a pension with us.

If you use the pensions dashboards to access information about you, you will be providing certain information (including your name, date of birth and address) to the dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service).

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the integrated service provider(s) that our administrator has in place to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these dashboards duties, we may also need to report information (which could potentially include personal information) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

Your rights in relation to your data

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data, ie request to see the personal data held about you.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to request that your personal data is deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the Data Controller with the ICO.

If you would like to discuss or exercise any of these rights, please contact the Trustees at the address below.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustees may not be able to perform their duties in relation to the Scheme, and your benefits could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>

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How to contact us

If you would like further information about this privacy notice or how to request your personal data you can contact us as follows:

**c/o The Condé Nast Publications Limited Retirement Benefits Scheme
The Adelphi,
1-11 John Adam Street
London
WC2N 6HT**

Email: ella.holloway@lcp.uk.com
Telephone: 01962 870060