

Aspire Savings Trust ("the Scheme") Privacy Policy

Punter Southall Aspire Pension Trust Company Limited, the Trustee of the Aspire Savings Trust ("the Trustee" "We" "us"), is committed to protecting and respecting your privacy.

This Policy (and any other documents referred to in it) and the Member Guide sets out the basis on which any personal data about you that the Trustee collects from you or from third parties (for example your employer or financial adviser) or that you provide to the Trustee, in relation to your membership of the Scheme will be processed by us.

The Trustee will be the data controller of your personal data under the General Data Protection Regulation (GDPR), which came into effect on 25 May 2018. You or your employer may provide personal data to the Trustee or the Trustee may collect it. This means that the Trustee is responsible for deciding how it holds and uses personal information about you and that it is required to notify you of the information contained in this Privacy Policy ("Policy"). It is important that you read this Policy so that you are aware of how and why the Trustee is using your personal information.

The Data Protection Officer is Richard Garmon-Jones, who you can contact at:

Address: 11 Strand, London WC2N 5HR

Telephone: 020 3327 5000

Email: data.protection@puntersouthallgroup.com

You can also contact the Trustee using the details provided at the end of this Policy in the "Contacting Us" section.

THE TYPE OF INFORMATION THE TRUSTEE WILL COLLECT FROM YOU AND HOW WE WILL USE IT

We will collect various types of personal information from you when you use the Scheme, depending on the services which you use. We will also obtain data from third parties including your employer, where your employer has enrolled you in the Scheme.

The information we will typically collect includes;

- Your personal details that you or your employer provides (typically your name, date of birth, address, salary and how much you are paying into the Scheme);
- Employment information;
- Anti-fraud information including passport, birth, marriage/civil partnership and death certificates;
- Our correspondence and telephone notes and telephone recordings;
- Benefit details; and
- Website and communication usage.

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Uses

We collect personal data so we can administer you as a member of the Scheme. Details of how we will process your data, and the bases for doing so are shown in the table below.

Service	Personal data may include the following	Role of Aspire Savings Trust	Basis for processing the data
Administration of your policy under the Scheme, eg receiving and applying contributions into the Scheme, making payments out of the Scheme.	Your Name, DoB, Employee number, Address, Email address, Job title, Age, Salary, Contribution rates, Pension policy value, Medical details	Data Controller	Performance of a contract
To provide you with information about services, offers, events or promotions relating to the Scheme that the Trustee feels may interest you, where permitted by law and unless you have advised it otherwise.	Your Name, DoB, Employee number, Address, Email address, Pension policy value.	Data Controller	Legitimate interest
To notify you about changes to the services provided by the Scheme	Your Name, DoB, Employee number, Address, Email address, Pension policy value.	Data Controller	Legitimate interest



<p>To transfer your pension to a replacement trustee</p>	<p>Your Name, DoB, Employee number, Address, Email address, Job title, Age, Salary, Contribution rates, Pension policy value, Medical details</p>	<p>Data Controller</p>	<p>To comply with our legal requirements</p>
<p>To research and analyse your data in order to better understand our members' requirements, to better understand our business and develop our services</p>	<p>Your Name, DoB, Employee number, Address, Email address, Job title, Age, Salary, Contribution rates, Pension policy value, Medical details</p>	<p>Data Controller</p>	<p>Legitimate interest</p>
<p>To process your personal information to comply with our legal or regulatory obligations which may include disclosing your personal information to third parties, the court service and/or regulators (e.g. The Pensions Regulator), HMRC, or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties, anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.</p>	<p>Your Name, DoB, Employee number, Address, Email address, Job title, Age, Salary, Contribution rates, Pension policy value, Medical details</p>	<p>Data Controller</p>	<p>To comply with our legal requirements</p>

Special Categories of Personal Data

In order to effectively administer your benefits under the Scheme, the Trustee is required to collect, process and disclose Special Categories of Personal Data about you which may include health data or data relating to your sexual orientation and/or the gender of your partner, and in limited circumstances data which may reveal your political or religious opinions or racial/ethnic origins, which you may provide or have provided to the Trustee or the Trustee may have obtained or may obtain from other sources to the extent relevant to the administration of your benefits under the Scheme.

For example, the Trustee may need to process data about your health in relation to any application for an ill-health benefit. The Trustee may also record details of your relatives and/or dependants, for example, on an 'Expression of Wishes' form so that the Trustee can distribute any benefits payable on your death. Alternatively, you may nominate a certain charity or political group to receive such distribution.

Where the Trustee processes Special Categories of Personal Data, the Trustee will generally do so by consent. If at any time you do not want the Trustee to process this personal data, you can contact the Trustee. You should be aware that in most circumstances we will not be able to provide these services to you and pay benefits to you or your dependants without continuing to process this personal data.

Where you are providing these types of personal data about a dependant, you agree that you have provided the Trustee's Privacy Policy to them and obtained their consent to the Trustee's collection, processing and disclosure of their Special Categories of Personal Data as set out above.

Automatic Personal Data Collection

The Trustee will not carry out any solely automated decision-making using your personal data.

Change of Purpose

The Trustee will only use your personal information for the purposes for which we collected it, unless we reasonably consider that it needs to use the personal information for another reason and that reason is compatible with the original purpose and permitted under data protection laws. If the Trustee needs to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

DISCLOSURE OF YOUR INFORMATION

The Trustee will share your data with the third parties set out below, for the purpose of administering the Scheme:

- Punter Southall Defined Contribution Consulting Ltd (trading as PS Aspire) the administrator of the Scheme;
- Punter Southall Group Limited which provides legal and governance services to the Aspire Savings Trust
- Idea Group Limited, Quai Administration Limited (Quai) and XPS Pensions Group Plc (XPS). Idea Group, Quai and XPS provide pension administration services to the Trustee, as the pension administrator for Scheme. It will share the details necessary to enable Idea Group, Quai and XPS to assist with administering the pension scheme such as recording your benefits, changing your investments and retirement age as directed by you on myAspire.
- moneyinfo – providing secure messaging and document storage facility for MyAspire.com (through which the Trustee will communicate with members of the Scheme).
- The administrator of your AVC policy and/or pension provider (if appropriate), as notified to you in the communication from the Aspire Savings Trust when you joined or subsequent communications from the Trustee advising of a change to the administrator.
- Norton Rose Fulbright (NRF) & Pinsent Masons LLP (PM). NRF and PM provides legal advice to the Trustee, when required. The Trustee will share the details necessary so NRF and PM can provide the appropriate legal advice it needs when determining questions and matters relating to you and your benefits in the Scheme.

The Trustee enters into agreements with such third parties to ensure that they respect the security of your data and use it only in accordance with data protection laws.

We will also disclose your personal information to third parties:

- in the event that the Scheme is sold, appoints a new establishing employer for the Scheme to replace Punter Southall Defined Contribution Consulting Limited or takes on assets from another scheme, in which case the Trustee will disclose your personal data to the prospective seller or buyer of such business or assets;
- if the assets of the Scheme are acquired by a third party as part of the purchase of the establishing employer or its parent company, in which case personal data held by us about our customers will be one of the transferred assets; and/or

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, in order to enforce or apply our Terms of Use and other agreements;
- to protect the rights, property, or safety of us, our users, customers and providers;
- as requested by the Pensions Regulator;
- to maintain the approved status of the Scheme so the members can continue to benefit from tax relieved status.

STORAGE OF YOUR PERSONAL DATA

As a member of the Aspire Savings Trust, the Trustee will retain your personal data relating to the administration of the Aspire Savings Trust for as long as you continue to have benefits in the Aspire Savings Trust. At the end of that period, the Trustee will retain this personal data in its secure archives for as long as is necessary for us to comply with the requirements of HMRC, the Pensions Regulator and the Financial Conduct Authority, to deal with any related legal claims and to continue to administer the Aspire Savings Trust for you or your beneficiaries.

We take the security and confidentiality of your personal data very seriously. We will use strict procedures and security features to aim at preventing unauthorised access, disclosure, alteration or deletion of your data. This includes restrictions on who can access data, using encryption to protect data when it is being transferred or stored, and maintaining corporate firewalls to safeguard against unauthorised access. For full details of the security measures we have in place, please contact us using the details shown below. Unfortunately, the transmission of information via the internet is not completely secure.

It is important that the personal information we hold about you is accurate and current. Please keep your records up-to-date on MyAspire.com. It is particularly important that you maintain the personal information held about you in My Details.

YOUR RIGHTS

Data protection laws provide you with the following rights to:

- request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information the Trustee holds about you and to check that it is lawfully processing it;
- request correction of the personal information that it holds about you. This enables you to have any incomplete or inaccurate information the Trustee holds about you corrected;

- request erasure of your personal information. This enables you to ask the Trustee to delete or remove personal information we hold about you. However, in certain circumstances we will not be able to delete such data. As a member of the Scheme, the Trustee has a legal obligation to retain your data so will not always be able to comply with your request. You also have the right to ask the Trustee to delete or remove your personal information where you have exercised your right to object to processing (see below);
- request the restriction of processing of your personal information, for example if you want to establish its accuracy or the reason for processing it; and
- request the transfer of your personal information to another party.

You also have the **right to object** to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights above). However, the Trustee may charge a reasonable fee if your request for access is clearly unfounded or excessive, for example if you keep requesting copies of the same data. Alternatively, we may refuse to comply with the request in such circumstances.

The Trustee may need to request specific information from you to help it confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Where the Trustee relies on your consent to process your personal data, for example in relation to any direct marketing we provide to you, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using any of the details set out below in the "Contacting Us" section. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to do so by law.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.



CHANGES TO OUR PRIVACY POLICY

Any changes the Trustee makes to its Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to its Policy.

CONTACTING US

If you have any queries, comments or requests regarding this Policy or you would like to exercise any of your rights set out above, you can contact us in the following ways:

by email:	mastertrust@psaspire.com
by telephone:	0203 327 5470
by post:	The Aspire Savings Trust Albion, Fishponds Road, Wokingham, RG41 2QE