

# Privacy notice for the Argos Section of the Sainsbury's Pension Scheme

The Trustee holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation. This notice explains how we store and use your data as a member or beneficiary of the Sainsbury's Pension Scheme. You do not need to take any action as a result of this notice.

## What we do with your data

As a data controller, we collect and process your personal data so that we can fulfil our legal duty to administer the Scheme and for other legitimate purposes relating to the operation of the Scheme

– so we can calculate and pay your benefits. The data we hold includes your name, address, salary, service, date of birth, National Insurance number and contact details.

You have provided much of our data; we also hold and process data from Sainsbury's, Argos and other schemes from where you may have transferred, HMRC, the DWP and regulatory bodies and from tracing organisations.

You also tell us about potential beneficiaries who would be eligible to receive benefits on your death. We assume that you have their consent to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the Scheme.

We also hold some special category or 'sensitive' data about members so that we can administer the Scheme (for example, for the purposes of providing ill-health or death benefits). We will typically only do so with your explicit consent or where there is an alternative legal basis for processing this information under data protection legislation. Where we are relying on your consent to process your sensitive data, you can withdraw it at any time.

## Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, Willis Towers Watson, the Scheme Actuary and JLT, the Scheme Administrator and/or Sainsbury's and Argos as employers supporting the Scheme.

In some circumstances we are joint controllers with Willis Towers Watson (as Actuary), the legal advisers, CMS (who may process your data to comply with their professional duties as advisers to the Trustee), and also Sainsbury's and Argos. Sainsbury's and Argos hold your data to comply with their legal obligations as the sponsoring employers of the Scheme. They have a legitimate interest in the Scheme being run in a cost-effective way and may have an interest in offering certain options to members. We may share information with Sainsbury's and Argos and their auditors and advisers for this purpose.

The Administrator and Actuary will, from time to time, transfer data to other countries, including outside the European Economic Area. Where such transfers are made, we will ensure adequate safeguards are in place.

## **Storage of your personal data**

We store your information until such time that we will no longer need it.

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to keep information relating to you until your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after six years; however, we may hold information for longer where we consider that we need it to pay the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

JLT will hold on to your personal data for a period to be agreed with the Trustee after the termination of the contract with us. This is to protect themselves against any subsequent legal claims.

## **Your rights**

You have the right to access your personal data and ask us to correct any errors in the data that we hold, or erase your personal data. You can also request that we restrict the way we process your personal data or object to its processing. In some circumstances, you have a right to request a copy of your personal data for the purposes of transferring that data elsewhere. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to run the Scheme, we may not be able to pay your benefits.

## **Contact details**

If you have any questions about this, please contact any of the Scheme's data controllers listed below:

J Sainsbury Pension Scheme Trustees Limited, J Sainsbury Plc and Sainsbury's Supermarkets Limited Pensions Department, 33 Holborn, London EC1 2HT

Argos Limited, J Sainsbury Plc and Sainsbury's Supermarkets Limited Pensions Department, 33 Holborn, London EC1 2HT

Email: Pensions@sainsburys.co.uk Telephone: 0207 695 4884

Administrator – JLT Benefit Solutions Post Handling Centre, St James's Tower, 7 Charlotte Street, Manchester M1 4DZ

Telephone: 0345 072 6772

Email: SPSArgos@jltgroup.com

Actuary – Gareth Oxtoby FIA, Willis Towers Watson, London Road, Reigate RH2 9PQ

Legal advisers – CMS Cameron McKenna Nabarro Olswang LLP, FAO Mark Atkinson, Cannon Place, 78 Cannon Street, London EC4N 6AF

## **What if you have a complaint about how we've handled your information?**

To make a complaint about how we've handled your information, contact us as set out above.

If you're not satisfied with our response to your complaint, or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office.

Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone: 0303 123 1113 or 01625 545 745