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The Pension and Life Assurance Plan for the Non-Teaching Staff of Oundle School (“the Scheme”) – Privacy Notice

The Trustees need personal information about you in order to run the Scheme and pay benefits.

In legal terms we are a ‘data controller’ and we are required to tell you some things about the personal information we have about you, how we use it and what your rights are in relation to it.

Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone numbers, email addresses, marital status, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number(which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- records of our communications with you, including any complaints; and
- in some cases, special categories of personal data such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, the above information may also be collected from other sources:

- Oundle School, the sponsoring employer of the Scheme;
- Isio, who administer the Scheme on our behalf;



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- The Scheme Actuary, currently Audra Rowlands (joint data controller) employed by Broadstone Pensions Ltd. and Broadstone Pensions Ltd. (also a joint controller) who provide actuarial services to the Scheme;
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP;
- Publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and we are trying to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;
- b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations and calculations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing should we happen to lose contact with you) or to prevent fraud;
- c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- e) when we undertake or agree to activities from time to time to help us manage the liabilities of the Scheme, such as longevity modelling and hedging, insurance, bulk transfers, pension increase exchanges and transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to



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these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- i required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- ii in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or direct us on benefit payments or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent;
- iii necessary for our legitimate interests: in pursuing the purposes set out in (a) to (e) above; in establishing, exercising or defending legal claims; and (when we make the disclosures to Oundle School for the audit and corporate transaction purposes referred to below) necessary for their legitimate interests, such interests in each case not being overridden by your privacy interests; and
- iv necessary for your legitimate interests in having your benefits administered correctly.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record, calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

We may share your information with the following recipients:

- our suppliers, including Oundle School and other providers of services to us and them, such as administrators, Banks and Deposit takers, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Scheme actuary (for actuarial calculations), and printing, communication, IT and hosting, marketing, and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);



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- Oundle School for audit purposes or in relation to corporate transactions (if any) initiated by them;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies, including when required bylaw or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including our own and those of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information, including for the purpose referred to in (a) to (e) above, may involve transferring your information outside of the United Kingdom. In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we require (through a binding agreement) that the recipients comply with appropriate measures designed to ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the relevant authority in the United Kingdom. Further details of these transfers including copies of any data transfer agreements we use are available from us on request.

Automated Decision Making

We do not use your personal data to carry out automated decision-making (including profiling) which produces legal effects concerning you or similarly significantly affects you.

Retention of your information

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To do this, we will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our retention



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management policy documentation. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests.

In practice, information relating to your membership of the Scheme is typically retained for the lifetime of the Scheme member and, where relevant, their dependants or beneficiaries, and for a period thereafter in line with legal, regulatory and limitation requirements.

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict its processing, and (in some circumstances) to require certain of your information to be transferred to you or a third party.

In some circumstances your right to erasure may not apply where records must be retained by law.

You also have rights under data protection law to object to the processing of your information on grounds which we have said are necessary for our legitimate interests (see above), or for marketing purposes (see above).

You also have the right to withdraw your consent to the use of your information to the extent such use is based on your consent.

The Trustees have established a formal Data Protection Complaints Procedure to ensure that complaints relating to the processing of personal data are handled in accordance with data protection legislation and within the required statutory timescales.

Data protection complaints are distinct from complaints relating to scheme administration or benefit entitlement and are not dealt with under the Scheme's Internal Dispute Resolution Procedure (IDRP). Where a complaint raises both data protection and pensions-related issues, the elements of the complaint may be considered separately under the relevant procedures.

The Trustees are responsible for ensuring that data protection complaints are appropriately acknowledged, investigated and responded to without undue delay, and for signposting individuals to the Information Commissioner's Office where required.



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If you have concerns about how your personal data is being handled in connection with the Scheme, including its accuracy, use, storage or disclosure, you have the right to raise a data protection complaint with the Trustees, via the Data Protection Complaints Procedure which reflects the specific requirements and timescales under data protection law. Details of how to raise a data protection complaint can be obtained from the Secretary to the Trustees of the Scheme c/o ISIO, AMP House, Dingwall Road, Croydon, CR0 2LX.

You also have the right to raise your concerns at any time with the Information Commissioner's Office (ICO), the UK regulatory authority responsible for data protection. Contact details for the ICO are shown below:

Address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Online: <https://www.ico.org.uk>

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Other Controllers

Other parties also need personal information about you in order to support the running of the Scheme.

Status of this privacy notice

This privacy notice was updated in July 2026. It is non-contractual. We reserve the right to amend it from time to time but will notify you where we do this.



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Reviewer – Oundle	AC
Post of Reviewer (s)	Secretary to Trustees
Review Date	01/07/2026
Reviewed and filed	01/07/2026
Next Review (max 3 yrs)	01/07/2027