



BE PENSION FUND TRUSTEES LIMITED
c/o The Secretary (HO-6)
Bank of England
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PRIVACY STATEMENT

BANK OF ENGLAND STAFF PENSION FUND (the "Fund")

Who we are

BE Pension Fund Trustees Limited (the "**Trustee**") is the trustee of the Bank of England Staff Pension Fund (the "**Fund**").

As the Trustee of the Fund, we hold certain personal information (known as "**personal data**") about Fund members and, where applicable, their dependants, beneficiaries and personal representatives. Most of the information held about you and processed by the Trustee in running the Fund will be personal data.

For legal purposes, the Trustee is known as the "**data controller**", as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender, marital/relationship status and contact address)
- details about your personal representatives
- relevant employment information (including current and past salary information, employment dates and accrual choices)
- details about your pension benefits
- medical and other details about your health (if you have applied for an ill health pension).

In order to properly administer the Fund and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you or from your employer. However, we may also receive your personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser or personal representative. If you are receiving a survivor's benefit from the Fund, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Fund and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Fund's governing documents, as well as under relevant legislation.

Personal data relating to the Fund is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Fund, 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"). Under the legislation, details relating to an individual's health, sexual orientation and sex life are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. The Trustee may, at times, need to process this type of data, for example, when considering any information relating to your relationship status on an expression of wish form or dealing with ill-health pensions.

Who we share your personal data with

As the Trustee needs help from various advisers to properly administer the Fund, we share personal data with the following:

- The Fund's professional advisors, including the Fund Actuary (currently XPS Pensions Group), auditor (currently Crowe Clark Whitehill LLP) and lawyers (Sacker & Partners LLP)
- The Bank, together with its professional advisers
- The Pension Trustee Support Unit, which consists of individuals who are employed by the Bank and who provide high level administration support to the Bank and Trustee
- The pension administrators (currently Equiniti Paymaster) who are responsible for the day to day administration of the Fund on behalf of the Bank/Trustee
- The Bank's Occupational Health Officer in connection with granting/reviewing pensions on the grounds of ill health
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- The advisers, designers, printers and mailing providers who help us to prepare the various communications that we send to you
- Insurance companies (Equitable Life, Prudential & Standard Life) for the administration of the Fund's additional voluntary contribution schemes
- The providers of the Trustee's banking and payment facilities
- Equiniti Data Services who provide the Trustee with mortality checking services
- The Pensioner Liaison Officer who is employed by the Bank and runs the Pensioner Liaison Organisation (see further below).

Which of those organisations are data controllers/joint data controllers?

In some instances, the Trustee will share your personal data with organisations who are:

- Data controllers in their own right - this is likely to be the case where those organisations are not simply acting on the instructions of and fulfilling the purposes of the Trustee, but are using the personal data for their own ends and in a way that is not aligned with the Trustee's purposes.
 - The Bank has identified itself as a data controller in certain circumstances, for example when evaluating its liabilities to the Fund and taking discretionary decisions. It may also be a joint data controller (see below) or a processor in other circumstances. The Bank's privacy statement can be found here: <https://www.bankofengland.co.uk/legal/privacy>

- The Trustee's auditor (currently CCW) has also confirmed that in most circumstances it will be a data controller because of the nature of its role and needing to act independently from the Trustee. CCW's privacy statement can be found here: <https://www.croweclarkwhitehill.co.uk/privacy-policy/>

However, the Trustee will remain your primary point of contact for data protection purposes (see "Who to contact about your personal data" below).

- Joint data controllers with the Trustee – this is likely to be the case where the organisation is acting alongside the Trustee in making decisions about what personal data is collected and why, and what it is used for.
- Our actuaries, currently XPS Pensions Group, formerly called Punter Southall Limited, including our individual Scheme Actuary, are classed as joint data controllers with the Trustee when providing certain actuarial and consultancy services. XPS has an appointed Data Protection Officer tasked with ensuring its compliance with data protection legislation. Your point of contact for XPS or the Scheme Actuary is Punter Southall Limited's Data Protection Officer, whose address is 11 Strand, London, WC2N 5HR.

Is data transferred outside of the European Economic Area?

Certain organisations providing services to the Trustee may have support functions based outside of the European Economic Area (the "EEA"). We are working with these organisations to ensure that any processing of personal data complies with the requirements of data protection legislation. You can contact us for more information about the safeguards which protect your personal data when it is processed outside of the EEA (including how to obtain copies of the protections in place) - see "Who to contact about your personal data" below.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Fund, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life.

However, we review the personal data held in relation to the Fund on a regular basis. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- **Right of Access** – you have the right to request information about the processing of your personal data, see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – as 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
- **Withdrawing consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact" below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Fund, 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.

Who to contact about your personal data

If you wish to:

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

please contact Geoff Winn or Steve Blackman in the Pension Trustee Support Unit on 020 7601 4671 / 4148 or e mail: pensiontrusteesu@bankofengland.co.uk.

If you would like to request a hard copy of this notice, please contact the pension administrators on 01293 604119 or by e mail: bankofengland@equiniti.com.

Making a complaint to the Information Commissioner's Office

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.

Updates to this notice

This notice is the latest version as at May 2018. This notice will be updated from time to time and you can see the current version at any time on the Bank's website at <https://www.bankofengland.co.uk/-/media/BoE/Files/about/bank-of-england-staff-pension-privacy-statement> (www.bankofengland.co.uk > About > Governance & Funding > staff codes and policies). Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact about your personal data" above).

Pensioner Liaison Organisation

The Bank currently funds the Pensioner Liaison Organisation for individuals in receipt of benefits from the Fund. The Bank and the Trustee are looking to put in place measures to ensure that the Pensioner Liaison Organisation can operate in a compliant manner under the new data protection regime. Further details of how the organisation may operate in the future will be made available to affected individuals in due course. In the meantime, if you are currently a member of the organisation, please continue to contact your local representative in the normal manner.

BE Pension Fund Trustees Limited
Trustee of the Bank of England Staff Pension Fund