Privacy Policy

NFU Staff Pension Scheme (Scheme)

Background

This Privacy Policy has been issued by the Trustee of the NFU Staff Pension Scheme (the "Trustee", "we", "us" or "our") and the Scheme Actuary of the NFU Staff Pension Scheme (the "Scheme"). It explains how we collect, use, store and share personal information in connection with the Scheme.

This Policy is intended to help you understand how your personal information is used under applicable UK data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025, together with related regulatory guidance and any legislation amending or replacing them from time to time.

This document replaces any earlier fair processing notice or privacy notice issued in relation to the Scheme.

Data Controller(s) and Contact Details

The Trustee of the NFU Staff Pension Scheme is the NFU Staff Pension Trust Company Limited. The Scheme Actuary is Rebekah Boddy of Barnett Waddingham Actuaries and Consultants Limited.

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and Scheme Actuary are treated as joint data controllers for the personal information processed for Scheme purposes.

The joint data controllers may be contacted as follows:

3 Devon Way

Longbridge

Birmingham

B31 2TS

Email: nfu@barnett-waddingham.co.uk

Telephone: 0333 1111 222

You can request the latest version of this Policy, or a copy of the Scheme's separate Data Protection Complaints Procedure, from the Scheme Secretary.

What this Policy covers

- the personal information we collect about you, what we do with it and why we hold it;
- who we receive personal information from and with whom we share it;
- what rights you have in relation to your personal information and how to contact us if you have questions or concerns;
- how we deal with data protection complaints, including how to obtain the separate Data Protection Complaints Procedure from the Scheme Secretary.

Section One – About your personal information

What information do we collect and process?

We collect and process personal information because you are or were a member of the Scheme, are or were connected to a member, or contact us in connection with the Scheme.

- personal contact details – names, titles, postal addresses, telephone numbers and email addresses;
- information about you – dates of birth, gender, marital status, dependants and next of kin;
- payroll and financial information – National Insurance numbers, payroll numbers, bank account details, tax status, salary and employment information; and
- pension and benefits information – details of accrued benefits, investment choices and death benefit nomination forms.

What special category / sensitive personal information do we collect?

We usually only ask for special category personal data (sometimes referred to as sensitive personal information) where this is necessary to administer the Scheme or to decide questions affecting your rights under the Scheme.

- health information / medical records – for example, where you request ill-health early retirement benefits or another benefit dependent on medical criteria;
- information about personal relationships or family circumstances – where relevant to death benefits, dependants' benefits, divorce / pension sharing matters or disputes;
- information that may be revealed in official documentation such as birth certificates, marriage certificates, passports or similar identification documents; and
- any additional special category data you choose to provide voluntarily when raising a query, right request or complaint.

How do we collect your personal information?

When you join the Scheme, personal details are provided by you and/or your employer so that we can create your membership record. This information is updated while you are a member and may be supplemented when benefits come into payment, on transfer, when you request scheme information, or where additional checks are needed.

- you (for example, where you notify us of a change of address or beneficiaries);
- your employer (for example, salary, payroll or HR updates);
- the Scheme's administrator, professional advisers and service providers;
- HM Revenue & Customs, The Pensions Regulator and other public bodies where relevant; and
- third parties such as tracing agents, medical advisers, occupational health providers or doctors where relevant and lawful.

Why do we process your personal information?

- to establish and maintain your membership record;
- to manage and administer the Scheme;
- to communicate with you about your benefits and the Scheme;
- to calculate, secure, pay and settle benefits;
- to comply with legal, regulatory, tax and trust law duties;
- to manage the Scheme's risks and liabilities and support good scheme governance;
- to support the sponsoring employer(s) in connection with relevant legal, regulatory, audit, HR and finance obligations; and
- to improve our information and knowledge about pension scheme administration where lawful and proportionate.

What are our legal grounds for processing your personal information?

We may process your personal information where this is necessary:

- to comply with legal obligations applying to the Trustee and/or Scheme Actuary under pensions legislation, tax legislation, trust law, court orders, Pensions Ombudsman determinations and the Scheme's governing documentation;
- for legitimate interests pursued by the Trustee, the Scheme Actuary or relevant third parties in running and managing the Scheme, provided those interests are not overridden by your rights and interests; and
- in limited cases, for recognised legitimate interests under UK data protection law where available and appropriate (for example, safeguarding a vulnerable individual), while continuing to comply with the wider UK GDPR principles.

If we rely on legitimate interests, we will consider necessity, proportionality and appropriate safeguards. Where the law provides a recognised legitimate interest, the ordinary balancing test may not be required, but the processing must still be necessary and fair.

What are our legal grounds for processing special category personal data?

- where we have obtained your **explicit consent**, where consent is the appropriate legal basis;
- where the processing is **necessary** for carrying out obligations or exercising rights under employment, social security or social protection law, including pensions law; and
- where the processing is **necessary** for reasons of substantial public interest, including circumstances recognised by the Data Protection Act 2018.

What would happen if we did not collect and process your personal information?

- we would not be able to manage or administer the Scheme properly;
- we may be unable to calculate or pay the correct benefits to the correct people at the correct time; and
- we could be in breach of legal and regulatory duties.

How long do we keep your personal information?

The Scheme is designed to provide benefits over a long period. We therefore keep personal information for as long as necessary to administer the Scheme, determine entitlement to benefits, respond to legal or regulatory queries and deal with claims or disputes. In general, the Trustee expects to retain relevant records for the lifetime of the Scheme and for an appropriate further period afterwards (currently usually up to 15 years, or longer where law or circumstances require).

Section Two – Using and sharing your personal information

How do we keep your personal information secure?

We use a range of technical and organisational measures to safeguard personal information, for both paper and electronic records. We also require third party service providers to implement appropriate security measures and contractual protections.

What do we do with any personal information provided by third parties?

Where we receive personal information from third parties, we add it to the information we already hold so that we can keep records accurate and up to date, administer the Scheme and make lawful decisions about benefits and other Scheme matters.

Who do we share personal information with?

For the purposes of administering and managing the Scheme, managing risks and liabilities, and paying benefits, we may share personal information with relevant third parties, including the sponsoring employer(s) and third parties who provide advice or services to the Trustee.

- administrators, actuaries, auditors, legal advisers and independent trustees;
- insurers, AVC providers, former providers where relevant, tracing agents and medical advisers;
- payroll, finance, compliance, HR and audit teams of the sponsoring employer(s), where relevant and lawful;
- public bodies, regulators, courts, law enforcement agencies, HM Revenue & Customs and The Pensions Regulator where disclosure is required or appropriate by law; and
- other service providers necessary for operating the Scheme.

Our service providers may act either as processors (acting on our instructions) or as controllers in their own right depending on the service in question.

International transfers

Your personal information may be transferred outside the UK where this is necessary for Scheme administration or support services. Where that happens, we will ensure that the transfer is made in accordance with UK data protection law.

Depending on the circumstances, this may include reliance on UK adequacy regulations, the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU standard contractual clauses, or another lawful transfer mechanism or exception.

Where we or our service providers assess international transfers, we will apply the legal standards in force at the relevant time, including the current UK approach to the "data protection test" for restricted transfers.

Section Three – Your rights and who to contact

What rights do you have?

In certain circumstances, you have the following rights in relation to your personal information:

- the right to object to processing;
- the right to request access to personal information relating to you;
- the right to request correction of inaccurate or incomplete personal information;
- rights in relation to solely automated decision-making that has legal or similarly significant effects on you;
- the right to request restriction of processing;
- the right to request portability of personal information in certain cases; and
- the right to request erasure of personal information in certain cases.

How will we respond to your request?

We will usually respond to rights requests within the time limits required by data protection law. If a request is complex, we will let you know as required by law.

For subject access requests, you are entitled to the personal information and related information we are able to provide based on reasonable and proportionate searches. If we reasonably need clarification from you, or need additional information to confirm your identity or locate the information requested, the applicable response period may be paused until we receive what we reasonably need.

Certain exemptions may apply under UK data protection legislation. This means that, in some situations, we may lawfully continue to store, process or transfer personal information even if you ask us not to.

Automated decision-making

The Trustee does not generally use solely automated decision-making or profiling that produces legal or similarly significant effects on members and beneficiaries.

If that position changes, and we use solely automated decision-making in a way that materially affects you, we will tell you and provide the safeguards required by law. These may include information about the decision, the right to make representations, the right to obtain meaningful human intervention and the right to contest the decision.

Questions, concerns and complaints

If you have questions or concerns about how your personal information has been processed, please contact us in the first instance using the contact details above.

The Scheme has a separate Data Protection Complaints Procedure. A copy can be requested from the Scheme Secretary via email at Samantha.Woods@nfu.org.uk. That procedure applies to complaints about compliance with data protection law and is separate from any complaint or dispute raised under the Scheme's Internal Dispute Resolution Procedure.

In line with applicable law, we may ask that data protection complaints are raised with us first under that procedure before they are escalated to the ICO. We will acknowledge data protection complaints within the timeframe required by law and will investigate and respond without undue delay.

If you remain dissatisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available at www.ico.org.uk/concerns or by calling the ICO helpline on 0303 123 1113.

Further Information – Typical categories of personal information

Category of personal information	What we use it for	Legal basis / condition	Where it comes from
Contact details (name, title, address, email, telephone)	To identify you, keep records up to date, send required communications and administer the Scheme	Legal obligation; legitimate interests in running the Scheme	You, employer, administrator, tracing agents
Identity and family information (date of birth, gender, marital status, dependants, next of kin)	To identify beneficiaries and determine entitlement to benefits	Legal obligation; trust law duties; legitimate interests in proper Scheme administration	You, employer, next of kin, official documents
Payroll / employment / tax information	To calculate benefits, deduct tax and maintain accurate records	Legal obligation; pensions and tax law requirements	Employer, HMRC, administrators, actuarial calculations
Bank details	To pay benefits	Legal obligation / performance of Scheme administration functions	You
Death benefit nomination forms	To inform Trustee discretion and decision-making on death benefits	Trust law duties; substantial public interest where relevant	You
Medical information	To assess ill-health and other medically dependent benefits	Social security / social protection law; substantial public interest; explicit consent where appropriate	You, doctors, occupational health advisers, employer
Official identification documents	To verify identity and status, and support changes to benefits or recipients	Legal obligation; legitimate interests in fraud prevention and proper administration	You, next of kin, tracing agents, official sources

Key Third Parties

Role	Third Party
Actuary	Rebekah Boddy, Barnett Waddingham LLP
Administrator	Barnett Waddingham LLP
Legal Advisers	Arc Pensions Law
Auditor	Crowe Clark Whitehill LLP
Independent Trustee	ZEDRA Governance Limited
AVC Provider	The National Farmers Union Mutual Insurance Society Limited
AVC Provider	Prudential plc
AVC Provider	Aviva
AVC Provider	Utmost Life and Pensions