

**This privacy notice applies to the St John's College Staff Pension Fund (SJCSPPF): current members, deferred members, pensioners and individuals who have opted out of membership**

**A summary of what this notice explains**

SJCSPPF is committed to protecting the privacy and security of personal data.

This notice explains what personal data SJCSPPF hold about "you" (current members, deferred members, pensioners and individuals who have opted out of membership), how we use them internally, how we share them, how long we keep them and what your legal rights are in relation to them.

This notice does not form part of any contract of employment or other contract to provide services.

For the parts of your personal data that you supply to us to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

**St John's College, Oxford has also published separate notices, which are applicable to various groups and activities. Those notices may also apply to you, depending on your circumstances, and it is important that you read this privacy notice together with other applicable privacy notices:**

You can access the College privacy notices at: <http://www.sjc.ox.ac.uk/gdpr>

**What is your personal data and how does the law regulate our use of it?**

"Personal data" is information relating to you as a living, identifiable individual. We refer to this as "your data".

Data protection law requires SJCSPPF ("us" or "we"), as data controller for your data:

- To process your data in a lawful, fair and transparent way;

- To collect your data only for explicit and legitimate purposes;
- To collect data only that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data are accurate and up to date;
- To ensure that your data are only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

### **SJCSPF's Contact Details**

If you need to contact us about your data, please contact: [sjcspf@sjc.ox.ac.uk](mailto:sjcspf@sjc.ox.ac.uk)

### **What personal data we hold about you and how we use it**

We may hold and use a range of data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from St John's College, Oxford or someone else.

Categories of data that we collect, store and use include (but are not limited to):

- The contact details that you provide to us, including names, addresses and telephone numbers.
- Your position at the College, role, contract terms, grade, salary, benefits and entitlements.
- Date of birth.
- Your financial details, including bank and building society account numbers, sort codes, BACS IDs, NI numbers, tax codes, payslips and similar data.
- St John's College salary history.
- Pensions membership data, including identification numbers, quotes and projections, terms benefits and contributions.
- Copies of identity documents, birth, marriage and death certificates and divorce arrangements.
- Attendance and absence records, including leave requests, sickness records and related data.
- Details of dependants.
- Expressions of wish for in service benefits.
- Details of any medical issues and/or disabilities that you have notified to us.

Further categories of data that we hold in relation to current members, deferred members, pensioners and individuals who have opted out of membership are set out in our Record of Processing Activity.

### **The lawful basis on which we process your data**

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purpose(s).

We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants benefits. We therefore process your personal data on the legal basis that the processing is necessary for the performance of the contract of employment between you and St John's College, Oxford, regarding your participation in the Scheme, to comply with our legal obligations and further to our legitimate interests as Trustee of the Scheme. If you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it. We also process personal data as appropriate for reasons relating to the effective administration of the Scheme

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

#### *How we apply further protection in the case of "Special Categories" of personal data*

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

The Special Categories of personal data consist of data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership.

They also consist of the processing of:

- genetic data;
- biometric data for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal information in the following circumstances:

- Where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the SJCSPF or you in connection with employment, social security or social protection; or
- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
  - for the exercise of a function conferred on SJCSPF or anyone else by an enactment or rule of law; or
  - for equal opportunities monitoring;

We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

#### *Details of our processing activities, including our lawful basis for processing*

Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to current staff, office holders and senior members and details of retention periods are set out in our Record of Processing Activity. Details of parties to whom we transfer data, and on what basis, are given below.

#### **Data that you provide to us and the possible consequences of you not providing it**

Most data that you provide to us is processed by us in order that we, and you, can each fulfil our contractual obligations and/or comply with obligations imposed by law.

#### **Other sources of your data**

Apart from the data that you provide to us, we may also process data about you from a range of sources. These include:

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- Data that we generate about you, such as when administering your benefits;
- St John's College, Oxford as your employer and which also administers the scheme on behalf of the Trustees;

### How we share your data

We do not, and will not, sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law.

Examples of bodies to whom we are may disclose certain data include, but are not limited to:

Organisation	Why?
St John's College, Oxford	To enable the College to administer the scheme on behalf of the Trustees. When necessary for the management and administration of the benefits provided by the Scheme.
The Pensions Regulator	To comply with their regulation of the sector
HM Revenues & Customs (HMRC)	Real time information released to HM Revenue & Customs (HMRC) in order to collect Income Tax and National Insurance contributions (NICs) from employees.
The scheme actuary	To enable valuation of the scheme and calculation of certain benefits.
The scheme auditor	To enable completion of the annual audit.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

Data which may be shared with third parties including St John's College, Oxford may include details of:

- death in service benefit nominations;
- health information about you (as a result of incapacity retirement benefit);
- information about your spousal or other relationships which might identify your sexuality.

We will only process or share such data when it is necessary for carrying out obligations and exercising specific rights of either you as a member of the pension scheme or of the SJCSPF or of the College in the fields of employment, social security or social protection law.

### **Sharing your data outside the European Union**

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a country where there is no “adequacy decision” by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your contract with us.

Otherwise, we will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

### **How long we keep your data**

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

Details of expected retention periods for the different categories of your personal information that we hold are set out in our Record of Processing Activity.

If there are legal proceedings, a regulatory, disciplinary or criminal investigation, suspected criminal activity, or relevant requests under data protection or freedom of information legislation, it may be necessary for us to suspend the deletion of data until the proceedings, investigation or request have been fully disposed of.

### **Your legal rights over your data**

Subject to certain conditions and exception set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;

- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in our detailed table of processing activities. Please visit <http://www.sjc.ox.ac.uk/gdpr> for further information.
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting [sjcspf@sjc.ox.ac.uk](mailto:sjcspf@sjc.ox.ac.uk).

If you wish to exercise any of your rights in relation to your data as processed by SJCSPP please contact [sjcspf@sjc.ox.ac.uk](mailto:sjcspf@sjc.ox.ac.uk). Some of your rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at <https://ico.org.uk/concerns/> if you believe that your data has been processed unlawfully.

### **Future changes to this privacy notice**

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes or to make the SJCSPP's or the St John's College's operations and procedures more efficient. If the change is material, we will give

you not less than two months' notice of the change so that you can exercise your rights, if appropriate, before the change comes into effect.