

# Data Privacy Notice

## Why are we writing to you now?

From 25 May 2018 the UK, like all EU member states, will be governed by the General Data Protection Regulation (GDPR) which replaces the Data Protection Act 1998. The aim of GDPR is to give people more control over how organisations use their data and to ensure greater regulation and accountability.

## Your personal data – what is it?

Personal data is information relating to a living individual who can be identified from that data. Identification can be by the information alone, or together with that data and other associated information which is in the possession of, or likely to come into the possession of, the 'Data Controller'. In the UK the processing of personal data is now governed by the GDPR.

## Who are we?

This Data Privacy Notice has been issued by the Maintenance of the Ministry Office (contact details below) which processes data on behalf of both the United Reformed Church Trust (URCT) and the United Reformed Church Ministers' Pension Trust Limited (URCMPTL), which are both registered as 'Data Controllers' of the personal data we hold. They determine how your personal data is processed and for what purposes.

Although the majority of data processed applies to both the URCT and the URCMPTL, we have identified a small amount of data which is processed on behalf of only one of the Trusts and this has been highlighted with the relevant Trust's acronym – for example 'Expression of Wishes Form – URCMPTL'.

## Why we need your personal data?

We collect and use your personal data for the following purposes:

- a) To enable us to comply with legal or industry requirements
- b) To enable us to process your salary/stipend/pension and other payments in accordance with statutory requirements
- c) To enable us to support your health and welfare requirements

## What is the legal basis for processing your personal data?

We use the following legal grounds to process your personal data. Although some of these may overlap, we have highlighted which legal basis we use for what purposes (listed above).

### Personal data:

- Contractual obligations
- Legal obligations

### Sensitive data:

- Employment, social security or social protection or collective agreement obligations

## How do we process your personal data?

The United Reformed Church Trust and the United Reformed Church Ministers' Pension Trust complies with its obligations under the GDPR by:

- Processing your personal data in a lawful, fair and transparent manner.
- Collecting only personal data which is adequate and relevant to the purposes we have specified in this notice.
- Not keeping your personal data longer than necessary for the purposes we have specified in this notice.
- Ensuring your personal data is accurate and up-to-date.
- Implementing appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, damage or destruction.

## Types of personal data we process

We process your personal data relevant to the above purposes. This includes:

- Full name
- Contact detail e.g. address, email, telephone number, etc
- Employment history
- Membership details
- Financial details
- Educational and training details
- Spouse and children's names/dates of birth

We also process sensitive categories of personal data that includes:

- Physical or mental health details
- Proposed recipients for death benefits – (Expression of Wishes Forms) - *URCMPTL*
- Racial or ethnic origins
- Religious or other beliefs of similar nature
- Trade union membership

## Where did we obtain your personal data from?

Although most of your personal data comes directly to us by you, there are some elements of your personal data which we obtain from:

- Synods
- Participating employers (in the URC Ministers' Pension Fund or URC Final Salary Scheme)

## Who the information may be shared with

All your personal data is treated as strictly confidential and mainly processed by our staff at Church House. For the purposes of IT hosting and maintenance, your personal data is also located and backed up onto our servers, which are within the UK. No third parties (apart from those specified in this notice) have access to your personal data unless the law allows them to do so.

Depending on whether you are a stipendiary minister/pensioner/employee, where required we share your personal data for the purposes we have specified in this notice with the following:

- URC Synods
- Participating employers in the URC Ministers' Pension Fund and URC Final Salary Scheme

- Other Pension Schemes which the URC uses/participates in
- Occupational health and welfare organisations
- Financial Services providers including<sup>1</sup>:
  - NorthgateArinso (Payroll Bureau) - <https://www.ngahr.com/privacy-policies#NGA%20HR%20Privacy%20Notice>
  - TPT Retirement Solutions (Administrators of the URC Final Salary Scheme) – URCT - <http://www.tpt.org.uk/privacy-policy>
- Ombudsmen and regulatory authorities
- Professional and Legal Advisors, including<sup>1</sup>:
  - Aon Hewitt (Actuary) – see Appendix 1
- Other voluntary and charitable organisations

### **How long is your personal data kept?**

Your personal data is kept in line with retention schedules which are designed to ensure that we can, primarily, meet legislative requirements. For copies of the retention schedules please contact the Records Manager at the United Reformed Church House, 86 Tavistock Place, London WC1H 9RT.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

### **Transfers of personal data**

We do not transfer your personal data outside of the UK/European Union.

### **What are your rights?**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- Request to access a copy of your personal data which we hold about you.
- Request to rectify your personal data if you find it to be inaccurate or out of date.
- Request to have your personal data erased where it is no longer necessary for us to retain such data.
- Request to have a restriction placed on further processing of your personal data when there is a dispute in relation to the accuracy or processing of your personal data.
- Request to obtain a copy of your personal data in a common machine-readable format and transmit that data directly to another organisation.

### **Who can I contact?**

If you have any questions about how your personal data is being used please email [rob.seaman@urc.org.uk](mailto:rob.seaman@urc.org.uk)  
You can also write to us at The United Reformed Church, 86 Tavistock Place, London WC1H 9RT.

### **How do I complain?**

If you are not satisfied with the way your personal data is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF, via email <https://ico.org.uk/global/contact-us/email/> or by telephone on 0303 123 1113.

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<sup>1</sup> Not all organisations with whom we necessarily share your personal data are explicitly stated in this list; only those which we share data with on a very frequent basis.

## APPENDIX 1

As explained above, it is sometimes necessary for us to share your data with external advisors. This appendix and the links included in the section above headed 'Who the information may be shared with' gives further information on how these advisors will use your data.

### Aon Hewitt Limited "QUICK READ" PRIVACY NOTICE

Aon Hewitt Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting contact us, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH