

The Sir Robert McAlpine Limited
Staff Pension and Life Assurance Scheme
Members Privacy Notice

1. Introduction

The Sir Robert McAlpine Limited Pension and Life Assurance Scheme (the “Scheme”) is a "data controller" meaning that we are responsible for deciding how we hold and use personal information about you, for the purposes of administering the pension scheme.

As trustees of the scheme, we are committed to protecting and respecting your privacy. This Privacy Notice explains how we collect, use, store, and protect your personal data as required under the UK’s General Data Protection Regulation (UK GDPR) and the UK’s Data Protection Act 2018.

You are being sent a copy of this privacy notice because you are a member of the Scheme by way of being a current member, deferred member or pensioner. This document makes you aware of how and why your personal data will be used and how long it will usually be retained for.

2. Personal Data We Collect

In connection with your scheme membership, we process personal data necessary to administer the pension scheme, which may include:

- Identity data: Name, date of birth, national insurance number, and gender.
- Contact data: Address, email address, and phone number.
- Financial data: Bank account details, salary, pension contributions, and tax information.
- Employment details: Employer name, employment history, pensionable service, and job title.
- Beneficiary information: Details of nominated beneficiaries or dependents.
- Records: death, birth and marriage certificates where relevant.
- Transactional data: details of transfers of funds in and out of the scheme including bank details, schemes from which transfers were made into or from, details of Independent Financial Advice taken (in certain circumstances)
- Health information: information about your health, including any medical condition, health and sickness records (only where they affect contributions into the Scheme or the payment of benefits).

3a. How We Use Your Personal Data

We will use the personal information we collect about you to:

- Deduct pension contributions from your salary whilst you are an active member of the Scheme
- Instruct our authorised third-party service providers to operate and administer the Scheme (including, where applicable, the payment of pensions)
- Communicate with you about the Scheme
- Keep records relating to the Scheme
- Comply with legal or regulatory requirements.

3b. How we use your sensitive personal information.

We will use your sensitive personal information in the following ways:

- in the case of any medical history, to confirm any periods of time where contributions were reduced (e.g. when maternity leave was taken, or a period of sick leave was taken)
- health details will be maintained where benefits are paid early (before the statutory minimum age limit) for health reasons.
- appropriate certificates and other relevant documentation will be maintained to support the payment of a pension or lump sum to a beneficiary.

4. Legal Bases for Processing Your Data

We rely on the following legal bases under the UK GDPR:

- Legitimate interests: For scheme administration, risk management, and fraud prevention.
- Legal obligation: To comply with our regulatory obligations.
- Consent: In specific cases where we may ask for your consent (e.g., to send you information about additional services or products).

In carrying out the above, and by instructing authorised third parties, we are fulfilling our, and your employer's, legal contract with you to meet the obligations with regards to the Scheme.

You have the right to withdraw consent at any time, however If you fail to provide, when requested, information which is necessary for us to operate the Scheme, we may not be able to administer your benefits successfully.

5. Data Sharing

We may share your personal data with:

- Scheme administrators and advisers: To manage your benefits and perform services on our behalf.
- Government and regulatory authorities: Such as HM Revenue & Customs (HMRC) and The Pensions Regulator.
- Insurers and reinsurers: Where required to provide benefits under the scheme.
- Third-party service providers: For activities such as auditing and IT support.
- Third parties in relation to the Scheme's connection to the pensions dashboard: such as pensions dashboard providers (for example, the Money and Pensions Service), pensions tracing agencies and other third parties who we rely on to connect to the pensions dashboard.

We ensure that all third parties respect the security of your data and process it in accordance with the law.

We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data security

We have put in place appropriate technical and organisational security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, agents and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7. Data Retention

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

We will retain your personal information for as long as your pension, or fund, is active, including payment of a beneficiary's pension, and for a period of 6 years after the pension is no longer payable.

Details are maintained even where a member transfers out from the Scheme in case of queries arising in the future. Further to that, we securely archive your personal information but may retain it indefinitely in case of future queries (including regulatory queries).

Generally, we retain personal data until the scheme is wound up or as required under applicable law, or as set out in our retention schedule, see appendix 1 (Retention Schedule).

8. Your Rights

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

9. Contact Us

If you have questions or concerns about this privacy notice or how we process your data, you can contact us here.

Contact	Lauren Haworth Scheme Secretary
By Post	Sir Robert McAlpine Limited Concept House, Home Park Mill Link Kings Langley, Hertfordshire WD4 8DU
By Email	lauren.haworth@srm.com

We may need to verify your identity to fulfil your request.

10. Right to Complain

If you are dissatisfied with how we handle your personal data, you have the right to complain to the Information Commissioner's Office (ICO) at www.ico.org.uk.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

11. Changes to This Privacy Notice

We may update this notice from time to time.
This policy was last updated in October 2025.