



PRIVACY NOTICE FOR PENSIONERS



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Rawle Gammon and Baker Holdings Ltd (we, us, our) is the Data Controller.

This Privacy Statement sets out how we will use the personal data relating to our pensioners.

We may make changes to this statement from time to time to reflect developments in the law or in the provision of our services.

What personal data is collected and what it is used for

Data such as your contact details and your bank account details will be held by us and used for the following reasons:

- to provide a pension to you
- to administer and manage our communication and relationship with you
- to keep you informed of news, updates or events that you may be interested in
- to enhance and improve the way that we communicate with you
- to manage health and safety and security
- to fulfil our regulatory obligations

Some of this information was provided by you during your employment with us or since your employment ceased. Other information may be obtained during the course of our relationship with you to enable us to carry out the purposes set out above.

We may also gather information from onsite CCTV surveillance or other publicly available sources.

Based on our relationship with you, we believe you may be interested in other materials, products or services we offer and, unless you have asked us not to, we may use your information for marketing purposes on a Legitimate Interest basis. This marketing may be by mail, telephone, SMS or email.

If you are receiving unwanted marketing information and you wish to opt-out, please contact the Brand Team at brandteam@rgbltd.co.uk or 01271 313000 and you will be immediately unsubscribed from our database. Alternatively you can also write to us at The Brand Team, Rawle gammon and Baker Holdings Ltd, Gammon House, Riverside Road, Pottington Business Park, Barnstaple, EX31 1QN.

You may opt-out or withdraw consent for us to process your data for marketing purposes at any time.

How will my personal data be processed

Your personal data will only be processed in line with the Data Protection Principles, which are:

- Personal Data must be processed **lawfully, fairly and in a transparent manner**
- Personal Data must only be collected for **specified, explicit and legitimate purposes**
- Personal Data must be **adequate, relevant and limited to what is necessary**
- Personal Data must be **accurate and up to date**
- Personal Data must not be kept any longer than **necessary**
- Personal Data must be processed in a manner that ensures **appropriate security**

How long will you keep my personal data for

We will not keep your personal data any longer than necessary, however, regulatory obligations require certain information such as some payroll details to be kept for twelve complete years.

Sensitive Information

We will not generally collect sensitive personal data such as information about physical or mental health from you, but if we do collect sensitive information or you choose to share sensitive information with us (such as details about your medical health), we will treat this information appropriately.

Disclosure of information to third parties

We will never sell your personal data to third parties. We will disclose your information to third parties with which we are associated in order to perform certain functions, for example, to administer payment of your pension.

We will also disclose information about you if we have a legal obligation to do so.

Obtaining the information we hold about you

You have a right to request access to the information we hold about you and the right to request reasonable corrections and deletion of any inaccuracies. Under the General Data Protection Regulations, we are required to respond to your request within one month. If you would like a copy of the information we hold about you, please write to Jenny Naylor, HR Director, Rawle Gammon and Baker Holdings Ltd, Gammon House, Riverside Road, Pottington Business Park, Barnstaple, EX31 1QN.

We will not charge you for responding to your request however we will ask you to provide sufficient evidence to demonstrate that you are the data subject or the data subject's legal representative.

NOTE: Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- Charge a reasonable fee taking into account the administrative costs of providing the information; or
- Refuse to provide the information. A refusal will be accompanied by an explanation why, together with information about your right to complain to the supervisory authority and to your rights to a judicial remedy.