**FOR THE ATTENTION OF ALL MEMBERS OF THE TRANSWORLD PUBLISHERS PENSION SCHEME (“the Scheme”)**

**Privacy Notice**

The Scheme Trustees have to keep certain personal data about you in order to administer your benefits under the Scheme. The Scheme Trustees take the security of your data very seriously and takes steps to ensure that:

* No more data is held about you than is necessary;
* The data is kept accurate; and
* The information about you is not disclosed to third parties other than as required to administer the Scheme and data will be anonymised where practical.

New data protection legislation came onto effect on 25 May 2018 and the Trustees are required to provide you with the information set out in this notice.

For the purpose of data protection legislation, the data controllers are the Scheme Trustees. In addition Jonathan Isted as Scheme Actuary also acts as a data controller when carrying out certain statutory activities for the Scheme. Where the Scheme Actuary is fulfilling his statutory function (or any other function required by the rules of the Scheme) he and the Trustees act as joint data controllers of your personal data and have control over the processing of it. For the processing of all other Scheme data the Trustees are the sole data controllers.

The contact details for the data controllers are shown at the end of this article. The controllers hold and use your data (referred to as “processing” under data protection legislation).

**Why do we hold your personal data?**

The data about you is held for the purposes of administering the Scheme, including to calculate and pay benefits. The ways that the Trustees will use your information include:

* Identifying you and your survivors and making sure your details are up to date;
* Communicating with you;
* Calculating and paying your benefits;
* Making Trustee decisions – such as whether to agree to early payment or how to distribute benefits after your death; and
* Deciding how to invest contributions paid by you or your employer.

The legal basis we use for processing your personal data is that we need to use your data in order to administer the Scheme correctly, so that we pay the right benefits to the right beneficiaries at the right time. The Trustees only collect and use your information where it has lawful grounds and legitimate business interests to do so.

Where the Trustees are required to process sensitive personal data relating to you (for example, in respect of death benefits or ill-health early retirement options), we require another legal reason for doing so, in addition to the one referred to above. That legal reason is that this data is required to enable the Trustees to make informed decisions where the rules state that Trustee discretion is required. When you provided this information to us you explicitly consented to the Trustees holding this data and using it for the purposes of the Scheme.

**How do we collect your personal data?**

The Trustees may collect and process information you provide to them in connection with the Scheme. This could include your date of birth, gender, marital status, length of employment, pensionable salary history, bank details, National Insurance Number and details of your dependants. It will also include your contact details such as residential address, email address and telephone number. For those still in active service other data we hold such as your earnings, address and service details is obtained from your employer and is regularly updated.

You need to provide information to the Trustees in order for them to correctly calculate and pay your Scheme benefits. As a condition of membership of the Scheme you are required to provide some of this personal data to us and you acknowledged this when you originally joined the Scheme. If you do not provide us with this information, we will not be able to properly and accurately administer your benefits under the Scheme and you may not receive the benefits you are entitled to.

We may also collect information from other parties such as anyone who might be entitled to benefits as a result of their connection with you, family members or personal representatives, people who have named you as a potential beneficiary in relation to their own pension benefits, or government bodies or departments such as HMRC.

**To whom do we disclose your personal data?**

In the course of administering the Scheme, the Trustees will engage professional advisers and third parties to assist it.

In particular, data may be passed to:

* HM Revenue & Customs when you are paid benefits from the Scheme and for the purpose of administering your benefits if you have been contracted out of the State second pension through your membership of the Scheme;
* Insurance companies if the Trustees intend to secure your benefits through an annuity policy and for the purposes of administering any benefits you have from paying additional voluntary contributions to the Scheme;
* The Scheme’s employers;
* Pensions administration service providers;
* Tracing agencies;
* Advisers such as actuarial firms, lawyers, accountants, auditors and investment consultants
* Fund managers; and
* Mailing houses (but only in respect of a specific member communication exercise by the Trustees).

The Trustees do not generally, and have no intention to, transfer or process the personal data that it collects about you outside the European Economic Area.

**How long will we store your personal data?**

Your personal data will be kept for as long as it is necessary to administer your benefits. Data may be kept after you have ceased to be a member of the Scheme and there are no further benefits payable in respect of you if the Trustees consider that retention of the data is necessary for the proper administration of the Scheme, for example to show how the liability for your benefits was discharged.

**What rights do you have?**

You have the right to:

* Obtain a copy of the personal data held about you;
* Have the data rectified, if it is inaccurate;
* Have the data erased if it is no longer necessary for the Trustees to hold it for the purposes of administering the Scheme;
* Withdraw any consents you have given to us in respect of your personal data, where we have asked for and are relying on your consent. You should be aware that if you decide to withdraw your consent to the Trustees holding data that they rely upon in order to administer the Scheme, this might affect the Scheme’s ability to provide services to you.
* Complain to the Information Commissioners Office if you believe your data is being processed unlawfully using the following details:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 or 01625 545 745

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

More information with regard to your rights can be found on [the Information Commissioner's Office website](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/).

**Contact**

You do not need to take any action as a result of reading this. However if you have any questions please contact the Pensions Manager, whose contact details are given below.

Stephen Holland

Pensions Manager

Penguin Random House

One Embassy Gardens

8 Viaduct Gardens

London SW11 7BW

Telephone: 020 78408642

Email: sholland@penguinrandomhouse.co.uk