

RICOH PENSIONS TRUSTEE LIMITED
PRIVACY NOTICE

Who we are

Ricoh Pensions Trustee Limited is the trustee (“the Trustee”) of the NRG Group Pension Scheme, Ikon Pension Plan, Danka Office Imaging Pension Scheme and Ricoh Document Management Retirement Benefits Scheme (“the Schemes”). As the Trustee of the Schemes, we hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Schemes will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension and any death benefits
- medical and other details about your health.

In order to properly administer the Schemes and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from one of the Schemes, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death or divorce.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Schemes and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Schemes' governing documents, as well as under relevant legislation.

The main purposes for which we use your personal data include, but are not limited to, the following:

- to set up, administer and manage your benefits;
- to provide information to you, or a representative authorised by you, in response to queries, changes to your benefits, or changes in legislation that we must tell you about;
- to undertake identity checks, to ensure that your benefits are protected against fraud and that you are still alive; and
- for compliance with regulatory and legal obligations, such as submitting statutory tax reports to HM Revenue & Customs.

Personal data relating to the Scheme is held on paper, on microfiche and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Schemes, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special categories of personal data"). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "special categories of personal data". Except where the legislation allows it (for example, where the processing is in connection with employment, social security and social protection, where you have made the relevant information manifestly public or where the information is required to establish, exercise or defend legal claims) this information cannot be processed or passed to a third party without your explicit consent. The Trustee may, at times, need to process this type of data, for example, when considering any information relating to your relationship status on an expression of wish form telling us who you would like us to consider for any benefits payable on your death.

Generally, we will not process personal information for any purpose or purposes which we have not told you about. However, there are exceptions to this. For example, if it were obvious to an individual that personal information would be processed for the new purpose or if the new purpose was in fact compatible with the original purpose(s) for which the personal information was collected.

Will personal data be transferred outside of the UK?

Certain organisations with which the Trustee shares Scheme personal data may from time to time process data outside of the UK. Where this happens, we will take reasonable steps to ensure that your personal data continues to be appropriately secured and treated in accordance with this notice. This may include entering

into data transfer agreements with relevant third parties based on the model clauses approved for this purpose to ensure that the third parties to whom we transfer personal data commit to ensuring an adequate level of protection for your personal information.

Who we share it with

As the Trustee needs help from various advisers to properly administer the Schemes, we share personal data with the following:

- Shirley Johnson, the Schemes' secretary
- the Schemes' professional advisers, including the Schemes' actuaries (J D Jones of Lane Clark Peacock LLP for the NRG Group Pension Scheme, Ikon Pension Plan and Danka Office Imaging Pension Scheme and P Schofield of XPS Pensions Group (previously known as Royal London) for the Ricoh Document Management Retirement Benefits Scheme), auditor, (RSM Tenon), medical advisers (as appointed in relation to individual cases), investment adviser (Lane Clark Peacock LLP) and lawyers (Sacker & Partners LLP)
- the third parties who are responsible for the day-to-day administration of the Schemes on behalf of the Trustee who is Capita Employee Benefits for the NRG Group Pension Scheme, Ikon Pension Plan and Danka Office Imaging Pension Scheme and XPS Pensions Group (previously known as Royal London) for the Ricoh Document Management Retirement Benefits Scheme)
- your current, past or future Ricoh employer which may include group companies which are based outside the UK.
- the third parties who provide services to Ricoh relating to the sponsorship of the Schemes, including its legal advisors, auditors and accountants
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- our appointed insurance companies for the purposes of additional voluntary contributions who are currently The Prudential Assurance Company Limited and Equitable Life Assurance Society for the NRG Group Pension Scheme, Santander for the Ikon Pension Plan and Aviva UK Limited, Clerical Medical and AEGON Scottish Equitable plc for the Danka Office Imaging Pension Scheme
- insurers, re-insurers or brokers providing services relating to securing benefits or de-risking mechanisms in accordance with the Schemes' rules
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System in the UK and/or a payment via a financial services corporation that specialises in the transfer of money from one location to another location when pensions are being paid overseas

Some of the Trustee's advisers may be data controllers in their own right. This is likely to be the case where those organisations are not simply acting on the instructions of and fulfilling the purposes of the Trustee, but are determining the purposes and means of processing personal data themselves. This is relevant as follows:

The Schemes' auditor, who is appointed by the Trustee to help carry out its annual audit of the Schemes, is data controller in relation to your personal data. For more information about what personal data they hold about you and how they use it, please follow the link: [Entities' privacy policy | RSM UK](#).

The Schemes' Actuary, who is appointed by the Trustee to value the Schemes' benefits and carry out other calculations in relation to Scheme benefits, is also data controller in relation to your personal data. The Actuary for the NRG Group Pension Scheme, Ikon Pension Plan and Danka Office Imaging Pension Scheme is J D Jones of Lane Clark Peacock LLP. For more information on how your personal data may be used by LCP when acting as Scheme Actuary, please follow the link: <https://www.lcp.com/third-party-privacy-notice>.

The Actuary for the Ricoh Document Management Retirement Benefits Scheme is P Schofield of XPS. For more information on how your personal data may be used by XPS when acting as Scheme Actuary, please follow the link: <https://www.xpsgroup.com/privacy-policy>.

How long we keep personal data for

The Trustee will keep personal data for as long as is required to meet the purposes for which it was collected. In practice, this will be the lifetime of the Scheme and for an appropriate period after that time. This is because of the long-term nature of pension schemes and the possibility of queries being brought many years after an individual has ceased to be a member or a scheme has been wound up.

From time to time, the Trustee will consider whether certain types of personal data are no longer needed. If they are not, they will generally be destroyed, erased or made inaccessible.

Security

We strive to use appropriate technical and physical security measures to protect your personal data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration and unauthorised disclosure. Service providers with access to your personal data are also selected carefully and are contractually required to use appropriate protective measures.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate/wrong, you can ask to have it corrected.
- **Right to Restrict processing** – you can require the Trustee to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.
- **Withdrawing consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact about your personal data" below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

- **Right to complain** – you have the right to complain to the Information Commissioner’s Office, or to bring an action before the court, if your personal data rights are not complied with (see “Making a complaint to the Information Commissioner’s Office” below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

please contact the Trustee.

If you are a member of the NRG Group Pension Scheme, Ikon Pension Plan or Danka Office Imaging Pension Scheme you can do this by contacting the Trustee c/o Capita Employee Benefits, PO Box 555, Stead House, Darlington, DL1 9YT or on Tel: 01227 774 653.

If you are a member of the Ricoh Document Management Retirement Benefits Scheme you can do this by contacting the Trustee c/o XPS Pensions Group, 3rd Floor, East Wing, 40 Torphichen Street, Edinburgh, EH3 8JB or on Tel: 0131 370 2888.

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: **0303 123 1113**.

Updates to this notice

This notice is the latest version as at January 2024.

This notice will be updated from time to time, for example, to reflect changes to the Schemes’ personal data flows and data protection law and guidance from the Information Commissioner’s Office. You can obtain a copy of the latest version by contacting the Trustee using the details set out above (see “Who to contact about your personal data”).

As at January 2024