

# Privacy Notice

## **NMB-Minebea UK Pension Scheme (the 'Scheme')**

### **Introduction**

This notice is intended to provide you with information about the personal data held about you which is needed to administer the Scheme and pay benefits from it. It explains the type of information collected, how it is used and who it is shared with.

In connection with this and for the purposes of the data protection laws and regulations:

- The Trustee of the Scheme is a 'data controller'.
- The Scheme Actuary, Victoria Snowden of Lane Clark & Peacock LLP (LCP), is also a data controller in respect of your personal data that they use to carry out their functions. For further information please see <https://www.lcp.com/en/third-party-privacy-notice>
- LCP when acting in the capacity as the administrators of the Scheme appointed by the Trustee are 'data processors'.
- Members, beneficiaries and other persons associated with them are 'data subjects'.
- 'Personal data' is information relating to an identified or identifiable natural person that could enable a living person to be identified.

### **Information we collect from or about you**

The information about you that we collect and process may be provided from a number of sources including: by you; your employer or a previous employer; HM Revenue & Customs (HMRC); a tracing agency who may use a range of sources such as the electoral roll (eg if we are trying to locate you); and (with your consent) your doctor (eg if retiring on grounds of ill health).

The categories of personal data that we collect, hold and use in relation to you; why we hold it, and how we use it are set out below:

<i>What data?</i>	<i>Why do we process it?</i>	<i>What's our lawful basis?</i>
<b>Personal details:</b> your name, date of birth, contact details (home address, email address, telephone numbers), marital and civil partnership status, dependents, copies of identification and similar documents (e.g. birth, marriage, civil partnership and death certificates, passport identity pages, decree absolute, expression of wish forms, pension sharing and earmarking orders)	We process this to contact you, including in relation to your entitlements and options under the Scheme's governing provisions.	The lawful basis we rely on to conduct this processing is it is necessary for our legitimate interest to respond appropriately to you in a timely manner and ensure that you are provided with the best client services.
	We may process this data to confirm your identity as part of verifying your eligibility for benefits.	The lawful basis we rely on to conduct this processing is to fulfil our legal and regulatory obligations as Trustee of the Scheme or to bring legal claims or defend legal claims made against us.
	We may process this data to meet the statutory requirements under the Pensions Dashboards Regulations including to make some of your pensions data available to you through the Pensions Dashboards Programme.	The lawful basis we rely on to conduct this processing is complying with our legal and regulatory obligations as Trustee of the Scheme.
	We may process this data to operate our business and provide our services, for statistical and financial modelling and to allow alternative ways of delivering your benefits, for example, through the use of insurance products.	When we process this data to provide key elements of our services, the lawful basis we rely on to conduct this processing is to fulfil our contractual obligations to you. In other circumstances, we may process this data as necessary for our legitimate interests in ensuring that you are provided with the best client services, including our commercial and reputational interests in client satisfaction.
	We may process this data to maintain our records.	When we process this data to provide our services to you, the lawful basis we rely on is our legitimate interests, including our commercial interests in

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		running our operations. In other circumstances, we may maintain records for purposes of our legal obligations as Trustee of the Scheme or, where relevant, in connection with legal claims we might bring or might be brought against us.
	To manage the Scheme's liabilities, including entering into insurance arrangements and selecting Scheme investments.	The lawful basis we rely on to conduct this processing is our legitimate interests, including our commercial interests in appropriately managing the Scheme's liabilities.
	We may process this data (including transfer this data to third parties) as part of a corporate transaction, including an investment, merger or acquisition.	The lawful basis we rely on to conduct this processing is our legitimate interests, including our commercial interests in a transaction and/or to the extent special category or criminal offence data is involved, your consent.
	We may process this data as part of an actuarial valuation.	The lawful basis we rely on to conduct this processing is our legal obligation to carry out an actuarial valuation.
<b>Employment details and pension scheme membership details:</b> your National Insurance (NI) number, dates of joining and leaving employment, employment history (eg whether part time or full time, periods of absence and job title), periods of pensionable service, earnings and details of other benefits.	We process this to assess eligibility for, calculate and provide you (and, if you are a member of the Scheme, your beneficiaries upon your death) with benefits.	The lawful basis we rely on to conduct this processing is to fulfil our contractual obligations to you, or as necessary for our legitimate interest to ensure you are provided with the best client services.
<b>Scheme related details:</b> your name, age, date of birth, gender, email address, telephone number, health data, marital status and information relevant to a claim for benefits following death, national insurance number, employment details, financial details, information about a criminal	We process this to maintain our records, to identify your potential benefit options and, where relevant, implement those options.	The lawful basis we rely on to conduct this processing is to fulfil our contractual obligations to you, or as necessary for our legitimate interest to ensure that you are provided with the best client services.

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conviction, and details of pension contributions and benefits (such as compulsory and voluntary contributions, actual or potential defined benefits and defined contribution account information).	We process this to comply with our legal and regulatory obligations as Trustee of the Scheme.	The lawful basis we rely on to conduct this processing is to fulfil our legal obligations or to defend legal claims made against us.
	We process this to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Scheme.	The lawful basis we rely on to conduct this processing is to fulfil our contractual obligations to you, or as necessary for our legitimate interest to ensure we respond appropriately to you in a timely manner.
<b>Financial details:</b> Your financial details such as other pension arrangements, relevant tax and National Insurance (NI) details (eg tax code, Lifetime Allowance and other protections), bank account details and deductions from pension payroll.	We process this for reference purposes, to pay pension benefits and to account to HMRC for tax.	The lawful basis we rely on to conduct this processing is it is necessary for our legitimate interest to allow us to provide our services.

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<b>Special categories of personal data:</b> Special categories personal data, such as health information, race, ethnic origin, religious or philosophical beliefs, trade union membership, genetics, biometrics (where used for ID purposes), sex life and/or sexual orientation.	<p>We may process biometric data and other data relating to you to verify your identity as part of ensuring benefits are paid to the correct recipient/beneficiary.</p>	<p>The lawful basis we rely on to conduct the biometric verification process is your explicit consent.</p> <p>When any personal data is retained after the initial biometric verification process (for example, to check any unsuccessful verification results), this information will be retained on the basis of our legal obligations to ensure the payments are made to the correct recipient/beneficiary. To the extent any special category data is involved, we will also process this data as necessary for legal claims or as part of our legal obligations to ensure benefits are paid to the correct individuals. As part of this process, we will not be processing any biometric data.</p>
	<p>We also process this personal data to identify whether a member is eligible for early-health retirement, to assess ill-health early retirement claims and to identify their potential benefit options and administer those options.</p>	<p>The lawful basis we rely on to identify or assess eligibility is your explicit consent. To the extent any of your personal data collected or generated as part of the eligibility assessment process is retained after the process is completed, we will rely on our legal obligations in respect of administering the Scheme, including in the field of employment, social security or social protection law or the processing of this data in the context of legal claims.</p>

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<b>Phone calls</b> all calls made or received by the Scheme helpline are documented (including your telephone number).	We process this to ensure we can monitor and adhere to quality standards and for the detection, investigation and prevention of crime (including fraud).	The lawful basis we rely on to conduct this processing is that it is necessary for our legitimate interests in preventing fraudulent actions in association with your pension and in allowing us to improve our services.
<b>All of the personal data listed above.</b>	We process this in connection with any sale, merger, acquisition, disposal or similar change in the employers participating in the Scheme.	The lawful basis we rely on to conduct this processing is consent (in relation to special categories of personal data) or it is necessary for our legitimate interest to allow us to change our business and improve our services.

## Consent

We may ask you to consent to us processing information in some circumstances. For example, where personal data collected is categorised as a special category of personal data (such as information about your health if retiring on grounds of ill health), or where we are asking for your feedback on services, if there is not an alternative legal basis for processing it we may ask for your consent.

Where we are relying on consent for processing of your personal data, you have the right to withdraw your consent to the processing at any time by writing to us using the contact details given below.

However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

## Who we might share this data with

The Trustee, the Scheme Actuary and the administrators as listed on page 1 will share your personal data with each other as necessary and with other advisers and service providers used to help administer the Scheme. This may include the Scheme's:

- legal advisers,
- investment advisers,
- auditors and accountants.

It may also include other organisations such as tracing, archiving, document printing and distribution and IT service providers. If you require details of any of these advisers/providers please contact us using the details given below.

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in a single, secure place. As part of this, we are required by law to connect to the pensions dashboard architecture which involved preparing our member data so that our systems would connect to the ecosystem. As part of the dashboards, we are receiving information about individuals and matching it against the data we hold about members on our systems (to verify if a person has a pension with us). Once a match has been achieved, we will be making certain pensions data available to the specific individual.

In light of a 'possible match' we may carry out further data processing to verify whether you have a pension with us.

If you use the pensions dashboards to access information about you, you will be providing certain information (including your name, date of birth and address) to the dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service).

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the integrated service provider(s) that our administrator has in place to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboards duties.

As part of these dashboards duties, we may also need to report information (which could potentially include personal information) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

In some circumstances, we may need to pass personal information to other third parties who advise or assist the Trustee and the Scheme Actuary, the sponsoring employer and any business associated with it, prospective purchasers of any of them (although in this latter case, where practicable, the data is anonymised), Government bodies, fund providers, insurance companies and persons associated with you. In the event that any such third-party processes personal information, reasonable steps will be taken to ensure that such third party agrees in writing to act only on our instruction and provides appropriate guarantees in respect of the technical and organisational security measures governing the processing to be carried out.

This may also involve transferring personal data to countries outside the United Kingdom / EEA and where that is the case reasonable steps will be taken to ensure that the processing of any personal data by the third party, including that the transfer to the third party complies with the data protection laws and regulations.

We may also pass personal information to other third parties at your request, for example where you are considering a possible transfer and you have asked us to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation we will assume that you have satisfied yourself that the third party has suitable security measures in place.

We do not carry out any automated decision making using your personal data and we will not use or share your data for marketing purposes.

### **How long we keep your personal data**

We will keep your personal data, in accordance with the law and regulatory guidance, for as long as is necessary for the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Scheme. When no longer needed, we will ensure that personal data is securely destroyed.

## Your rights

You have a right to:

- a copy of your personal data held;
- have your data corrected if it is inaccurate or incomplete;
- have your data deleted or removed if it is no longer necessary for the purpose of administering the Scheme;
- restrict the processing of your data;
- withdraw any consent you have given in respect of your personal data;
- data portability - to obtain and reuse your data for your own purposes.

Please note that the rights set out above are all subject to the rights of the Trustee to continue to hold or use personal data where the Trustee are required to do so for a legitimate purpose such as administering benefits under the Scheme or where they are otherwise, for any legal reason, required to continue to hold or use your personal data.

If you wish to exercise any of these rights, please contact us using the contact details below. We will aim to respond to any request received from you within one month of receiving your request. Access to your data will usually be provided free of charge.

Contact details	Complaints
<p>You do not need to take any action as a result of reading this but if you have any questions please contact:</p> <p>Team NMB-Minebea</p> <p>Lane Clarke and Peacock St Paul's House St Paul's Hill Winchester Hampshire SO22 5AB</p> <p>Tel: +44 (0)1962 672994</p> <p>NMBAdmin@lcp.uk.com</p>	<p>If you are not happy with the way your personal data is held or processed, please contact us at the address in the first column of this table.</p> <p>You also have the right to complain to the Information Commissioners Office (ICO) using the following contact details:</p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Tel: 0303 123 1113</p> <p>Email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a></p> <p>More information is available on the ICO website at <a href="https://ico.org.uk/">https://ico.org.uk/</a>.</p>



## **Updates to this notice**

We may update or amend this privacy notice from time to time to comply with law or to meet changing business requirements. Any changes made to the privacy notice will be posted on the pension section of the NMB-Minebea website at <https://nmb-minebea.co.uk/> and notified to you within the Trustee's Newsletter to Members.

This privacy notice was last updated in January 2026.