

# Nationwide Pension Fund Privacy Notice

June 2025

# Privacy Notice

## Who we are

As the Trustee of the Nationwide Pension Fund (the Fund), we hold certain personal information about Fund members and, where applicable, their dependants and beneficiaries. Most of the data held and processed by the Trustee in running the Fund will be “personal data” as it’s information from which you, as an individual, can be identified.

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 do 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
- your age and date of birth
- your gender
- contact details, such as your address, email address and telephone number
- your national insurance number
- information about your benefits under the Fund, including pensions and death benefits, together with corresponding details of assets, investments and insurance
- your pensionable service
- relevant employment information, such as salary information, pensionable pay, employment dates, length of service, and career history (where relevant)
- details of your bank account to pay benefits to if you are a pensioner or we are paying a lump sum to you
- your marital status
- details about your dependants and/or beneficiaries where this is relevant to benefits which may be payable following your death
- details of medical/health conditions if you apply to receive benefits on grounds of ill health
- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a “pensions identifier”, which is a string of characters used to identify your specific benefits under the Fund
- information on trade union membership.

## How do we gather your information?

Your personal information will generally be collected directly from you or from your employer. However, the Trustee may also receive information from other parties such as HM Revenue & Customs, the Pensions Ombudsman, tracing agencies and online identity verification tools or people acting on your behalf such as a parent, guardian, financial adviser or someone who holds a Power of Attorney. If someone other than you provides this information, we'll record what's been provided and who gave it to us.

If you're receiving a dependant's benefit from the Fund, or a benefit resulting from a divorce or dissolution of a civil partnership, we may have been given information about you by the deceased member or through enquiries undertaken by us on the member's death.

The Trustee won't automatically provide a copy of this privacy notice to your dependants and beneficiaries because that could seriously impair our ability to administer and manage the Fund and pay benefits. However, please do share this privacy notice with them and where you provide personal data about them to us we'll assume you have their consent to do so.

## How do we use that information?

The Trustee needs to hold and process information about you for us to administer the Fund, and to calculate and pay benefits. Under the legislation, this means that we have a legitimate interest in processing the information. We also hold your information:

- to allow us to comply with our obligations towards members under the Fund's governing documents, as well as under relevant legislation; and
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes "matching", where we use personal data that a user has provided to search our Fund records to check whether that user is a member of the Fund, and where we collect further personal data from that user in the event of a "possible match". We will not collect any personal data from you that we do not have a legal basis for holding.

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

Due to the nature of running the Fund, we may also need to hold and process some particularly sensitive information about you and/or your dependants and beneficiaries. This is known in law as "special categories of personal data". This includes information that relates to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation, political affiliations and trade union membership. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. The Fund will only collect any special category personal data when it has a legitimate interest in holding that information, for example information about your health if you apply to receive your benefits on the grounds of ill health.

## What else we do with personal data

We may transfer, store, or process your personal data outside of the UK. Where this is the case, we will take reasonable steps to ensure that your personal data continues to be appropriately secured. This may include entering into data transfer agreements based on the model clauses approved by the European Commission or, where relevant, the UK, to ensure that third parties commit to ensuring an adequate level of protection for your personal data.

In particular, the third-party administrator of the Fund (Gallagher) has offshored a number of non-member facing administration services to its subsidiary company in Romania. The UK has recognised all EU member states (including Romania) as providing an adequate level of data protection for the purposes of UK data protection legislation.

## Who do we share it with?

We're not allowed to share personal data about you with other organisations and people, unless the law allows us to or you have given your consent. The Fund needs to share information with others (see below) to provide you with benefits, when there is a legitimate interest, and in order for the Trustee to meet contractual and other legal obligations.

We share personal data with the following:

- the third parties who are responsible for the day-to-day administration of the Fund on behalf of the Trustee;
- the employer to the Fund (i.e. the company that employed you while you are or were an active member of the Fund) and other companies in the group;
- the Fund's professional advisers, including the Fund actuary, auditors, investment advisers, lawyers and medical adviser;
- 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;
- the advisers and printers who help us to provide you with various communications such as the online secure member portal and your annual benefit statement;
- third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, as well as the Fund's Integrated Service Provider (ISP), which provides a service allowing pensions information from the Fund to be connected to the dashboard ecosystem;
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions and to help the Trustee appropriately fund, support and provide benefits under the Fund;
- depending upon how we pay pensions, the personal data we have to supply in order to carry out a BACS transfer (the Bankers' Automated Clearing Service) in the UK or an overseas pensions payment via Western Union;
- tracing agencies who assist the Trustee with updating Fund data;
- the Nationwide Group Staff Union, in respect of Union members who pay their Union fees via their pension.

The Trustee will only share the essential data that is needed by those organisations and will make sure that they treat the data with the same care as the Trustee uses.

Some organisations the Trustee shares information with will have their own published privacy policy and links to some of these are published on the privacy policy page of the [nationwidepensionfund.co.uk](https://nationwidepensionfund.co.uk) website.

## How long do we keep personal data for?

We must keep all personal data safe and only hold it for as long as necessary. To comply with UK tax and pensions law, we must keep certain personal data for a minimum of 6 years (such as name, address, date of joining the Fund and benefit details). Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life so that we have the information we need to pay benefits and to answer queries relating to your benefits.

We may also be required to retain some of your personal information after your death so we have the information we need to pay benefits to your dependants and to answer queries relating to your benefits.

We review the personal data held in relation to the Fund on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

## Your rights

- 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 digital format.
- If you believe that the personal data we hold about you is inaccurate, you can request to have it corrected.
- You can instruct the Trustee to restrict the processing of your personal data in certain circumstances, for example, whilst an accuracy issue is being resolved.
- You can object to your personal data being processed, although the Trustee can override this objection in specific instances.
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us.
- You can request that your personal data is deleted altogether.

You should be aware that taking any of the above steps could impact on the payment of your benefits, the ability for you to build up benefits and 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, exercise any of your rights mentioned above, request a hard copy of this notice or make a complaint about how we have handled your personal data, please contact:

**The Secretary to the Trustee,  
Nationwide Pension Fund,  
Nationwide House,  
Pipers Way,  
Swindon,  
SN38 2GN**

## Making a complaint to the Information Commissioner's Office

If you're 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 - helpline number: **0303 123 1113**.

## Updates to this notice

This notice is the latest version as at June 2025. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at [nationwidepensionfund.co.uk](https://nationwidepensionfund.co.uk).