



## **William Jackson Pension Plan Privacy Notice**

### **1. Introduction**

This Privacy Notice explains how we collect, use, and protect your personal data in relation to your membership of the William Jackson Pension Plan (“the Plan”). We manage your personal data so we can run the pension scheme and pay benefits. We are committed to ensuring your privacy is protected and to complying with our obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### **2. Who We Are**

The Trustee of the Plan is the data controller responsible for your personal data. You can contact us at:

Post:

Pensions Department, William Jackson Food Group Ltd  
The Riverside Building, Livingstone Road  
Hessle, East Yorkshire, HU13 0DZ

Email:

[grouppensions@wjfg.co.uk](mailto:grouppensions@wjfg.co.uk)

Telephone Number:

01482 301214

### **3. What Personal Data We Collect**

We may collect and process the following types of personal data:

- Name, date of birth, gender, marital status, nationality
- National Insurance number
- Contact details (address, email, telephone number)
- Employment history and salary details
- Pension contributions and entitlements
- Bank account details for pension payments
- Information about your spouse, civil partner, or dependents
- Health information (for ill-health retirement cases)
- Criminal offence data for fraud prevention
- Copies of identification documents (e.g. passport, birth/marriage certificates)

## **4. How We Collect Your Data**

We collect your data from:

- You directly (via forms, correspondence) or your spouse/ dependents
- Your employer or former employer
- Previous pension providers
- Scheme administrators and professional advisers
- Tracing agencies
- HMRC and other statutory bodies

## **5. Why We Use Your Data**

We use your data to:

- Operate the Plan and administer your pension benefits
- Carry out actuarial, funding and investment activities
- Maintain accurate records
- Access ill health or incapacity benefits
- Communicate with you
- Comply with legal and regulatory obligations
- Make decisions about benefits (e.g. early retirement, death benefits)

## **6. Lawful Basis for Processing**

We process your data under the following lawful bases:

- Legal obligation: to comply with pension and tax laws, trustee fiduciary duties.
- Contractual necessity: to pay and manage benefits under the Plan Rules/your membership.
- Legitimate interests: to manage the Plan effectively
- Consent: where required for sensitive data (e.g. health information)
- Special category data: processed under employment, social security and social protection law; substantial public interest (pension administration), or explicit consent where needed.
- Criminal offence data: processed under legal obligations and substantial public interest grounds (fraud prevention, safeguarding assets).

## **7. Sharing Your Data**

We may share your data with:

- Scheme administrators (Trustees and internal administration teams)
- Actuaries, auditors, legal advisers
- Payroll
- Banking payment providers
- Tracing, mortality screening services
- Legal, medical, and professional advisers (including occupational health where relevant)
- HMRC and regulatory authorities
- Your employer (for employment-related data)
- Insurers (who we insure your specific benefits with)
- Beneficiaries or executors (in the event of death)

We ensure all third parties comply with data protection laws and have appropriate safeguards in place. These third parties may transfer your personal data outside the European Economic Area (EEA) to jurisdictions that may not provide the same level of protection as within the EEA. Where such transfers occur, we will ensure that appropriate safeguards are implemented to protect your data in accordance with applicable laws.

## **8. Data Retention**

We retain your data for as long as necessary to administer your benefits and meet legal obligations. This may extend beyond your membership or lifetime.

## **9. Your Rights**

Subject to legal limitations and the rights of others, you may:

- Request access to your data and information about processing.
- Request rectification of inaccurate or incomplete data.
- Request erasure (where no longer needed and not legally required).
- Request restriction of processing.
- Exercise data portability (where processing is based on consent or contract and carried out by automated means).
- Object to processing based on legitimate interests (including profiling for funding/risk analysis).
- Not be subject to automated decision-making producing legal or similarly significant effects, unless permitted by law with safeguards. To exercise rights, use the contact details in section 2.
- You also have the right to complain to the ICO (<https://ico.org.uk>)



## **10. Contact and Complaints**

If you have questions or concerns about how your data is handled, please contact the Trustee using the details above (section 2).

If you are not satisfied with our response or believe we are processing your personal information not in compliance with your jurisdiction's Data Protection law, you can lodge a complaint with the Information Commissioner's Office using the link <https://ico.org.uk>

## **11. General Information**

### **Security**

We implement technical and organisational measures to protect personal data, including access controls, encryption in transit and at rest (where appropriate), supplier due diligence, data minimisation, training, and incident response procedures. We require processors to meet equivalent standards.

### **Changes to this notice**

We may update this notice to reflect changes in law, guidance, or Plan operations. The latest version will be available at <https://www.wjfg.co.uk/pensions> and upon request.