

## Fair Processing Notice

OSPS is the pension scheme for support staff of the University or of the Associated Employers participating in the Scheme. OSPS Trustee Limited is the sole Trustee of the Scheme.

Your privacy is important to us. We will process your personal data in accordance with applicable data protection law.

The data controller in respect of the personal data you submit to us either directly or via your employer, is the Trustee of the University of Oxford Staff Pension Scheme (the “**Scheme**”) who you can contact via the Pensions Officer at [osps@admin.ox.ac.uk](mailto:osps@admin.ox.ac.uk). We use your personal data that is provided to us to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse and dependants benefits. We therefore process your personal data on the legal basis that the processing is necessary for the performance of the contract of employment between you and your employer regarding your participation in the Scheme, to comply with our legal obligations and further to our legitimate interests as Trustee of the Scheme. If you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it. We also process personal data as appropriate for reasons relating to the effective administration of the Scheme.

We will transfer your data to your employer, other participating employers in the Scheme and their advisers, the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. Some of these recipients (such as the scheme administrator) will act as data processors (meaning they will process your data as we instruct) but others, such as our pensions consultancy provider and Scheme Actuary (as further explained at the end of this notice), will act as data controllers (meaning that they will process your data (including by sharing it with others, potentially outside the European Economic Area) in a way which they determine, as required by their role and the services they provide to the Scheme). We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that your employer sells its business or assets (in which case we may disclose your personal data to the prospective buyer), in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustees, the members of the Scheme, or others. We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

When you near retirement and if you change address during retirement we will seek your consent (via the relevant form) to process your personal data (including by disclosing your information to third parties) for the purposes of the University's Pensioners' Welfare Officer visiting Scheme pensioners living in Oxfordshire and in connection with membership of the Association of Oxford University Pensioners. If you provide your consent for either or both of these purposes, you are entitled to withdraw it at any time by contacting the Pensions Officer at [osps@admin.ox.ac.uk](mailto:osps@admin.ox.ac.uk). You can find out more about these services on our website <http://www.admin.ox.ac.uk/finance/epp/pensions/pensioners/>

Your personal data may be processed outside of the European Economic Area (“**EEA**”) where required in order for us or your employer to provide benefits to or in respect of you. In each instance, we have ensured that the processing of your personal data outside the EEA is governed by the Standard Contractual Clauses approved by the European Commission.

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data.

Data Protection legislation gives you the right to access information held about you. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. Where we or third parties are processing your personal data on the basis that you have consented to that processing then you are entitled to withdraw your consent. If you do withdraw your consent, we may still be able to process some of the data that you have provided to us on other grounds. Some data, for example data in relation to your health or personal life, is regarded as 'special categories of data'. We have to process that special category data to perform our obligations under law related to your employment and the law relating to social protection. Therefore, data protection law does not require us to obtain your consent to process it.

From 25 May 2018, you are entitled to receive the personal data that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller. You can exercise your data protection rights, including your rights to access, restrict, object to the processing of, rectify and erase your personal data by contacting the Pensions Officer at [osps@admin.ox.ac.uk](mailto:osps@admin.ox.ac.uk). If you are unhappy with the way in which your personal data is being processed you have a right to lodge a complaint with the Information Commissioner's Office. You can report your concerns by telephoning their helpline on 0303 123 1113 or through their website at <https://ico.org.uk/concerns>.

### **Contact details**

If you have any questions or comments on this notice, or concerns about the way we handle your personal data, you can contact us via email [osps@admin.ox.ac.uk](mailto:osps@admin.ox.ac.uk) or write to us at:

**Pensions Office  
Finance Division  
6 Worcester Street  
Oxford  
OX1 2BX**

### **Aon Hewitt Limited (Aon)**

More detail about Scheme's pension consultancy services provider (Aon) and the Scheme Actuary's use of your personal information is set out in their Privacy Notice. You can review this notice which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting Aon, including reference to the Scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.