



**PRIVACY NOTICE (SUMMARY) for the members and beneficiaries of the  
Cumbria County Council**

Local Pensions Partnership (LPP) administers the Fund on behalf of the Administering Authority and we hold certain information about you ("personal data") which we need to administer the Fund.

We have summarised some of the key ways in which we deal with this information below. Further information can be found in the Full Privacy Notice at <https://www.localpensionspartnership.org.uk/cookie-policy> website from the **25<sup>th</sup> of May 2018**.

**What personal data do we hold?**

The types of data we hold and process will typically include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth and national insurance number.
- Information relating to your benefits in the Fund, including length of service and salary.
- Other information in relation to your membership of the Fund or to enable the calculation or payment of benefits, for example bank account details.

We obtain some of this personal data directly from you and the Administering Authority. We may also obtain data from your employer (for example, salary information) and from other sources including public databases.

**What will we do with your personal data?**

We will use this personal data to administer the Fund on behalf of the Administering Authority and to calculate and provide you (and, if you are a member of the Fund, your beneficiaries if you die) with benefits, for statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members' benefits and how that money should be invested) and to comply with our legal obligations.

From time to time we will share your personal data with third parties, including our contractors, advisors, government and law enforcement agencies and insurers in order to comply with the Administering Authorities obligations under law, and in connection with the provision of services that help us carry out LPP's and the Administering Authorities duties, rights and discretions in relation to the Fund. These organisations are listed in the full Privacy Notice.

In some cases these recipients may be outside the UK. If this occurs, we will make sure that appropriate safeguards are in place to protect your data in accordance with applicable laws. Please use the contact details below if you want more information in connection with this.

**What is the legal basis for our use of your personal data?**

The legal basis for our use of your personal data will generally be one or more of the following:

- a) we need to process your personal data to satisfy the Administering Authorities legal obligations of the of the Fund; and

- b) we need to process your personal data to carry out a task in the public interest or in the exercise of official authority in our capacity as a pension administrator of a public body; and
- c) we need to process your personal data for the legitimate interests of administering the Fund on behalf of the Administering Authority and calculating and paying benefits from the Fund and to perform our obligations and exercise any rights and discretions the Administering Authority has in relation to the Fund; and\*
- d) because we need to process your personal data to meet the Administrating Authorities contractual obligations in relation to the Fund (for example, under an agreement that you will pay additional voluntary contributions to the Fund), or to take steps, at your request, before entering into a contract.

### **How long will we hold your data?**

We may retain your personal data for up to 99 years after benefits have stopped being paid or as long as we need it to administer the Fund on behalf of the Administering Authority and to deal with any questions or complaints that we may receive about this, unless the law requires us to keep it for a longer period. In practice, this means that your personal data may be retained for as long as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Fund and after those benefits stop being paid.

### **Your rights**

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask us to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline (0303 123 1113).

If you wish to exercise any of these rights, please contact the Fund Administrator below. You also have the right to lodge a complaint in relation to this summary notice, the full Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the benefits payable to you under the Fund. In some cases it could mean that we are unable to put your pension into payment or have to stop your pension (if already in payment).

### **Contacting us**

Please contact the Fund Administrator Local Pensions Partnership (LPP) at [DPA@localpensionspartnership.org.uk](mailto:DPA@localpensionspartnership.org.uk) for further information.

### **Data Protection Officer**

You may also contact our data protection officer Greg Smith at [DPA@localpensionspartnership.org.uk](mailto:DPA@localpensionspartnership.org.uk) for further information.

\*The GDPR does not permit public authorities to rely on legitimate interests for any processing they undertake in their capacity as a public authority. However, where the public authority has other legitimate purposes outside of their tasks as a public authority e.g. a contract between the Administering Authority and individual where AVCs are being made, it may be possible to rely on legitimate interests as a legal basis for collecting and processing that personal data. Legal advice should be taken