

STATE BANK OF INDIA (UK) PENSION SCHEME ("SCHEME")

DATA PROTECTION AND PRIVACY POLICY

This is the Trustees' Data Protection and Privacy Policy relating to the Scheme.

The Trustees are committed to keeping your personal information secure. Please see the attached Privacy Notice which has been issued to the members of the Scheme.

Privacy policy

1. Where we obtain your information

In the course of administering your pension, we may hold information about you which is provided by you, your employer or former employer, other pension schemes or medical advisers.

The information we hold includes your name, address, email address, phone number, date of birth, gender, NI number, salary details, bank details, employment history, periods of membership of the Scheme and possibly details of other pension arrangements that you have e.g. in relation to transfers in and out of the Scheme. We may also hold information about your spouse, dependants or other potential beneficiaries, and we may hold sensitive personal information e.g. health information, membership of trade unions, race, religion or sexual orientation.

2. How we use your information

Your information will be used to administer your pension benefits and for related activities. In particular, we will use the information to:

- Calculate your benefits, including online calculations that you request;
- Identify what benefits are, or might be, payable to you or, in the event of your death, any beneficiaries;
- Deal with any queries or disputes you may have about your benefits;
- Communicate with you by electronic means, including online, by post or by other means to keep you updated on matters related to the Scheme;
- Provide you with information about your benefits and options available to you.

We may add new features, or change some features, of the website. We will notify you of any changes as they go live.

3. Why we use your information

The law requires that the Trustees only use your personal data for defined lawful purposes.

We will only use your data where:

- it is necessary to comply with our legal obligations as Trustees, e.g. to pay your benefits as they fall due;

- it is necessary to protect your interests, e.g. if we need to let you know about benefit options; or
- it is in the legitimate interests of the Trustees to use your data in that way, and in doing so we are not breaching your rights, e.g. any of the uses referred to above.

We will only process sensitive data, such as health information, with your consent. You have the right to withdraw that consent at any time but please note that failure to provide consent, or withdrawal of the consent, could affect our ability to assess your entitlement to certain benefits, e.g. without access to your medical information, the Trustees could not process a claim for ill-health early retirement.

4. Sharing your information

We may share your information with:

- any of your employers or former employers who participate or have participated in the Scheme;
- our professional advisers (including legal advisers, medical advisers and auditors);
- the third party administrator appointed by the Trustees to provide day to day administration services;
- the Scheme Actuary;
- other organisations providing services to the Trustees, including insurance companies, pensions governance and communications providers and pensions tracing services

but in each case only in relation to matters connected to the administration of the Scheme and your benefits under them. We will never use or transfer your data for purposes unconnected with the administration of the Scheme.

We may also share your information with government agencies and other authorities (including HMRC and the Pensions Regulator) where necessary for the proper administration of your benefits, the prevention of crime or to meet legal and regulatory requirements.

In addition, we may participate on a voluntary basis in the National Fraud Initiative. This is a data matching exercise carried out by the Cabinet Office under which we would provide particular sets of electronic data which are then compared against records held by other public and private sector bodies to detect fraud.

5. Processing your information outside the European Economic Area (EEA)

All countries within the EEA, including the UK, have similar standards for the protection of personal data. Where any of your information is transferred outside the EEA (e.g. because any of our advisers or service providers, or the sponsoring employers, have IT systems located in other jurisdictions) we ensure that there are appropriate safeguards in place to ensure the security of personal data.

Please see the "Contact us" section below if you would like further information about these safeguards.

6. Security of your information

The Trustees are committed to ensuring that your personal information is secure. We have in place appropriate technical and contractual measures to ensure that information is only shared for the reasons, and by the means, set out in this notice.

The Trustees take great care to ensure that your information is kept secure when we need to share this with a third party as outlined above.

7. How long do we keep your information?

Pension Funds are long-term. We will keep your personal information for as long as we need it to administer the Scheme in accordance with the Rules of the Scheme (to comply with the law) and for our legitimate interests to respond to queries, claims or disputes relating to the Scheme, including from regulators as well as beneficiaries. This means that we will retain your personal data until the date which is 15 years after the date of completion of the winding up of the Scheme, if and when that occurs.

8. Monitoring and recording

We may monitor, record, store and use any telephone, email or other communication with you in order to maintain a record of any instructions given to us, for training purposes, for crime prevention and to improve the quality of service to members of the Scheme.

9. Access to your information

By law you are entitled to know what personal information we hold about you, the purpose for which we hold it and the identity of any person to whom it has been disclosed. You can also ask us to correct any errors in your data, and can ask for unnecessary or outdated data to be deleted. Please see the "Contact us" section if you would like more information.

You are also entitled to receive a copy of the information and you can exercise these rights by using the contact details in section 12 below.

10. Process for reporting data breaches

If we become aware of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data held for the purposes of the Scheme, and there is a risk to individuals' rights and freedoms, we will notify the Information Commissioner within 72 hours of becoming aware of that breach, where feasible. When reporting such a breach, we will identify and report the measures taken or proposed to deal with that breach and mitigate its effects. We will also keep a record of all such breaches, whether or not they need to be reported to the Information Commissioner.

11. Trustee training

The Trustees have undertaken training regarding the requirements of the General Data Protection Regulation, which comes into force on 25 May 2018. The Trustees will keep that training up to date on an annual basis.

12. Contact us

The Trustees of the Scheme are the "data controller", i.e. we determine the purposes for which your personal data are processed, and how they are processed. The Scheme actuary, Scheme auditors and Scheme legal advisers are also data controllers in relation to the Scheme.

If you would like any further information about the Trustees' approach to data protection and privacy, or to request details about the information we hold, please contact the Trustees of the State Bank of India (UK) Pension Scheme, c/o Capita Employee Solutions, DB Consulting and Scheme Management, 65 Gresham Street, London EC2V 7NQ, email: peter.rolland@capita.co.uk and telephone number: 0207 7098 4834.

13. The Information Commissioner


The Information Commissioner is the UK's independent authority set up to uphold information rights and data privacy for individuals. You have the right to lodge a complaint with the Information Commissioner if you are dissatisfied with any aspect of the way that we collect and use your personal information.

The Information Commissioner's website can be found [here](#) or you can call their helpline on 0303 123 1113.

14. Updates and changes

We will keep this privacy policy under review and may update it from time to time without prior notice. Any revised policy will appear online at <https://sbi-london.sbiuk.com/>. Please check every now and then for any updates.

Signed:



David Chandler

Chair of the Trustees of the Scheme

Date: 18th May 2018