

BASF UK Group Pension Scheme

Privacy Notice

Introduction

BASF Pensions Trustee Limited (the Trustee) is the **Data Controller** of all personal data relating to the BASF UK Group Pension Scheme and has a duty to process this information fairly and lawfully.

Information we collect about you

Depending on your membership category and status, the Trustee will hold a variety of information about you.

When you joined the Scheme, you and/or your employer provided personal details so that your membership record could be generated. This information is updated whilst you are a member of the Scheme and may be provided by you, your employer and other third parties, such as the Scheme Administrator or HMRC. The Trustee may also ask you for additional information from time-to-time.

Your information is needed to properly administer the Scheme and to calculate and pay benefits. The Trustee therefore has a legitimate interest in holding and processing certain information about you.

The Trustee may also hold and process sensitive information about you, your dependants, or beneficiaries (known as *sensitive personal data*). Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

We hold personal data relating to the Scheme on paper and on computer systems. We will not collect any personal data from you that we do not need.

If we don't collect and process your personal information, then:

- We would not be able to manage or administer the Scheme appropriately
- We would not be able to pay the benefits that you are entitled to under the Scheme
- We would be in breach of our legal and regulatory duties

Who we share your personal data with

The Trustee does not disclose your information to third parties, except when required for contractual or legal reasons, for other specifically identified purposes, or if you've given your consent.

The Trustee needs help from various advisers and third parties to properly administer the Scheme and to ensure the correct benefits are provided. For these reasons, the **Scheme Administrator** holds your data, and your information may also be shared with the **Scheme Actuary** (who help assess the funding level of the Scheme) and other professional advisers, including the **Auditor** and **Legal Adviser**.

How long will we keep your personal data

The Trustee keeps all personal data safe and only holds it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data for a minimum of **six-years**.

Given the nature of pension schemes, the Trustee may need to keep some information for the rest of your life.

Your rights regarding the personal information you provide to us

You have certain rights in relation to the personal information we hold about you, which we detail below. Some of these only apply in certain circumstances as set out below. We also set out how to exercise those rights. Please note that we will require you to verify your identity before we respond to any of your requests.

Right of Information	The right to know the personal information held about you, how it is used, who it is shared with and how long it is kept.
Right of Access	If you require a copy of information we hold about you, it is free of charge unless the Trustee deem it necessary to charge an administration fee. The Trustee may not provide you with certain personal information if providing it would interfere with a person's rights and freedom or where another exemption applies.
Right to Rectification	The accuracy of the information held about you is important. Under the DPA 2018 and UK GDPR, you have the right to access the information held about you and have any inaccuracies corrected. When you request a correction, please explain in detail why you believe the personal data held about you to be inaccurate or incomplete so that corrections can be made (if required). Please note that whilst the Trustee assesses whether the personal data held about you is inaccurate or incomplete, you may exercise your right to restrict our processing of the applicable data.
Right to Erasure	This is also known as the "right to be forgotten".
Right to Data Portability	You have the right to receive a subset of the personal data collected from you in a structured, commonly used and machine-readable format and a right to request that the Trustee transfers such personal data to another third party. If you wish to transfer the personal data to another third party, please ensure you detail that third party and note that the Trustee will only do so where it is technically feasible. The Trustee are not responsible for the security of the personal data or it's processing once received by the third party. The Trustee may not provide you with certain data if providing it would interfere with right and freedom of another person.
Restriction of Processing to Storage Only	The right to require the Trustee to stop processing personal data we hold about you other than for storage purposes in certain circumstances. If the Trustee stop processing the personal data, the Trustee may use it again if there are valid grounds under data protection laws for us to do so.
Making a Complaint	The right to lodge a complaint with relevant data protection supervisory authorities. In the UK, it is the Information Commissioner's Office (ICO).

Complaints

If you wish to make a complaint about how we process your personal data, please [contact us](#) and we will endeavour to deal with your request as soon as possible. This does not interfere with your right to raise a complaint with a relevant data protection supervisory authority.

Changes to this Privacy Notice

The Scheme reserves the right to change this Notice from time-to-time. Any changes will become effective when we post the revised Privacy Notice on the [Pension Website](#).

Your use of the website, or continued participation in the Scheme, following these changes means that you accept the revised Privacy Notice. It is your responsibility to ensure that you are aware of the latest version of this Notice.

Appendix: Legal Bases of Processing

Category of Personal Data	Purpose for Processing	Legal Basis of Processing
Personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number and identifiers such as national insurance number	<ul style="list-style-type: none"> Correspondence for the purpose of administration of the Scheme To notify you about services & changes to services To conduct member satisfaction surveys For internal record keeping To verify your identity, to prevent and detect fraud and to comply with our legal & regulatory obligations 	<ul style="list-style-type: none"> Performance of a contract as required by the Scheme Legitimate interests to run an effective business
Personal details and family, lifestyle, and social circumstances such as details about current marriage and partnerships and marital history, details of family and dependents	<ul style="list-style-type: none"> To carry out our obligations arising from any agreement that we have with, or concerning you and to provide you with the information, benefits, and services that you request from us Risk management including credit risk analysis and the insurance of longevity risks and related demographic risks 	<ul style="list-style-type: none"> Performance of a contract as required by the Scheme Legitimate interests to run an effective business
Personal details and employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, attendance record, health and safety records, security records, job title and job responsibilities, financial details such as income, salary, assets and investments, bank account details to process pension payments, benefits, grants, and insurance details	<ul style="list-style-type: none"> To administer the Scheme including to process data to calculate and pay benefits To comply with any present or future law, rule, regulation, guidance, or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes To comply with any requests received from BASF group companies To comply with requests made by local and foreign regulators, governments, and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation 	<ul style="list-style-type: none"> Performance of a contract as required by the Scheme Legitimate interests to run an effective business
Personal details and pension entitlement	<ul style="list-style-type: none"> To comply with and carry out your instructions in relation to your benefits and investment choices including in relation to additional voluntary contributions and voluntary deductions, where applicable 	<ul style="list-style-type: none"> Performance of a contract Legitimate interests to run an effective business
Personal details and details in relation to your physical and mental health	<ul style="list-style-type: none"> Compliance with our legal obligations Necessary for carrying out our legal obligations in the field of social security law 	<ul style="list-style-type: none"> Legitimate interests to run an effective business Explicit consent