



**BE PENSION FUND TRUSTEES LIMITED**  
c/o The Secretary (HO-6)  
Bank of England  
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## **PRIVACY STATEMENT**

### **BANK OF ENGLAND STAFF PENSION FUND (the “Fund”)**

#### **Who we are**

BE Pension Fund Trustees Limited (the “**Trustee**”) is the trustee of the Bank of England Staff Pension Fund (the “**Fund**”).

As the Trustee of the Fund, we hold certain personal information (known as “**personal data**”) about Fund members and, where applicable, their dependants, beneficiaries and personal representatives. Most of the information held about you and processed by the Trustee in running the Fund will be personal data.

For legal purposes, the Trustee is known as the “**data controller**”, as we decide the purposes for and the means by which the personal data we hold is processed.

#### **What information we collect about you**

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your gender
- your marital/relationship status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender, marital/relationship status and contact address)
- details about your personal representatives
- relevant employment information (including current and past salary information, employment dates and accrual choices)
- details about your pension benefits
- medical and other details about your health (if you have applied for an ill health pension).

In order to properly administer the Fund and to calculate and pay benefits, from time to time we may also need to hold other information about you.

#### **How we gather your personal information**

Your personal data will generally be collected directly from you or from your employer. However, we may also receive your personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser or personal representative. If you are receiving a survivor’s benefit from the Fund, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member’s death.

## **How we use that information**

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Fund and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Fund's governing documents, as well as under relevant legislation.

Personal data relating to the Fund is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Fund, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special categories of personal data"). Under the legislation, details relating to an individual's health, sexual orientation and sex life are regarded 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. The Trustee may, at times, need to process this type of data, for example, when considering any information relating to your relationship status on an expression of wish form or dealing with ill-health pensions.

Where you have provided us with information about other individuals, such as family members, dependants or potential beneficiaries under the Fund, please ensure that those individuals are aware of the information contained in this statement.

## **Who we share your personal data with**

As the Trustee needs help from various advisers to properly administer the Fund, we may share personal data with the following:

- The Fund's professional advisers, including the Fund Actuary (currently XPS Pensions Limited ("XPS")), auditor (currently Crowe UK LLP ("Crowe")) and lawyers (Sacker & Partners LLP)
- The Bank, together with its professional advisers
- The Pension Trustee Support Unit, which consists of individuals who are employed directly or indirectly by the Bank as employees or contractors and who provide high level administration support to the Bank and Trustee
- The pension administrators (currently Equiniti Paymaster) who are responsible for the day to day administration of the Fund on behalf of the Bank/Trustee
- The Bank's Occupational Health Officer in connection with pensions on the grounds of ill health
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) or other third parties as required by law – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- The advisers, designers, printers and mailing providers who help us to prepare the various communications that we send to you
- Insurance companies (Utmost Life and Pensions, Prudential & Standard Life) for the administration of the Fund's additional voluntary contribution schemes
- The providers of the Trustee's banking and payment facilities
- Equiniti Data Services who provide the Trustee with mortality checking services
- The Pensioner Liaison Officer which consist of individuals who are employed directly or indirectly by the Bank as employees or contractors and runs the Pensioner Liaison Organisation and organisers of the BE Social and Sports Club, where you have opted-in to receive communications
- Insurance companies and other organisations for the purposes of investigating and/or implementing liability and risk management exercises

## **Which of those organisations are data controllers?**

In some instances, the Trustee will share your personal data with organisations who are data controllers in their own right - this is likely to be the case where those organisations are not simply

acting on the instructions of and fulfilling the purposes of the Trustee, but are using the personal data for their own ends and in a way that is not aligned with the Trustee's purposes. This means those organisations have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. Examples of the organisations which have identified as a data controller are set out below:

- The Bank has identified itself as a data controller in certain circumstances, for example when evaluating its liabilities to the Fund and taking discretionary decisions. It may also be a joint data controller or a processor in other circumstances. The Bank's privacy statement can be found here: <https://www.bankofengland.co.uk/legal/privacy>
- The Trustee's auditor (currently Crowe) has confirmed that in most circumstances it will be a data controller because of the nature of its role and needing to act independently from the Trustee. Crowe's privacy statement can be found here: <https://www.crowe.com/uk/croweuk/privacy-policy>
- The current XPS Pensions Scheme Actuary and XPS Pensions when providing defined benefits actuarial consulting services are typically Data Controllers in their own right and so we share your personal information with XPS Pensions in order for them to provide these services. The XPS Pensions Privacy Information is available at: <https://www.xpsgroup.com/legal-regulatory/privacy-policy/>

The relevant notice for you is labelled "Combined Scheme Actuary and actuarial consulting services to pension schemes".

XPS Pensions may make changes from time to time so you should check the latest version of this Privacy Information occasionally. The Scheme Actuary may change. If you wish to know who the current Scheme Actuary is, please refer to the most recent scheme accounts, or contact the Trustees.

## Transfers of personal data to other countries

Any transfer of Fund personal data outside the UK or European Economic Area will comply with the requirements of data protection legislation. In particular, such transfers will generally be based on the EU Commission's standard contractual clauses or UK standard contractual clauses. You can find copies of these clauses [here](#).

## How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Fund, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life.

However, we review the personal data held in relation to the Fund periodically. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

## Your rights

- **Right of Access** – you have the right to request information about the processing of your personal data, see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances

- **Withdrawing consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances
- **Right to complain** – you have the right to complain to the Information Commissioner’s Office, or to bring an action before the court, if your personal data rights are not complied with (see “Making a complaint to the Information Commissioner’s Office” below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Fund, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

### **Who to contact about your personal data**

If you wish to:

- see your personal data or to exercise any of the rights mentioned above; or
- make a complaint about how we have handled your personal data,

Please contact Equiniti Paymaster on 0203 048 1997 or by e mail: [bankofengland@equiniti.com](mailto:bankofengland@equiniti.com)  
They can also provide a hard copy of this notice if required.

### **Making a complaint to the Information Commissioner’s Office**

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: 0303 123 1113.

### **Updates to this notice**

This notice is the latest version as at August 2021. This notice will be updated from time to time and you can see the current version at any time on the Bank’s website at <https://www.bankofengland.co.uk/-/media/BoE/Files/about/bank-of-england-staff-pension-privacy-statement> ([www.bankofengland.co.uk](http://www.bankofengland.co.uk) > About > Governance & Funding > staff codes and policies). Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see “Who to contact about your personal data” above).

**BE Pension Fund Trustees Limited**  
**Trustee of the Bank of England Staff Pension Fund**