

# Bupa Pension Schemes:

## Privacy Notice

This notice applies to members and beneficiaries of the following schemes (the “**Schemes**”):

- The Bupa Pension Scheme
- The Bupa Home Healthcare Limited Pension Scheme
- The Cromwell Hospital Retirement Benefits Plan

The Trustees of the Schemes (“**we**”, “**our**” or “**us**”) are committed to protecting your privacy when dealing with your personal information. This privacy notice provides details about the information we collect about you, how we use it and how we protect it. It also provides information about [your rights](#).

If you have any questions about how we handle your information, please contact us at [dataprotection@bupa.com](mailto:dataprotection@bupa.com).

**Notice last updated: April 2025**

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### 1. [Information about us](#)

In this privacy notice, ‘we’, ‘us’ and ‘our’ mean The Trustees of the Schemes. For contact details, see *Trustee contacts* below.

The Trustee of the Scheme you are a member or beneficiary of, as shown in your pension documentation, makes decisions about how your information is handled as a Data Controller. This means that the Trustee decides how and why your data is used. As Data Controllers, the Trustees collect and process your personal data for the purposes of administering the Scheme in compliance with their legal obligations and for their other legitimate interests relating to the operation of the Scheme, such as funding, benefit design and running the Scheme in a cost-effective way.

In some circumstances, the Trustees are joint controllers with Scheme Actuaries, companies in the Bupa Group (as employers), legal advisers, and Bupa Independent Medical Advisory Service (IMAS, as medical adviser).

This privacy notice contains information on what personal information about you the Scheme collects, who from, what we do with this information, the lawful basis on which personal information is processed and what rights you have.

## 2. What this privacy notice covers

This privacy notice applies to members and beneficiaries of the Schemes which are operated by Bupa Trustees. If you are a member or beneficiary of a Scheme not managed by a Bupa Trustee (such as NEST or My Bupa LifeSight Plan), you should read the [Privacy Notice provided by the Trustee of that Scheme](#).

## 3. How we collect personal information

We collect personal information from you and the people and organisations listed below.

You must provide most of this personal information so that we can meet our obligations, you can enjoy the benefits that we offer, and we can manage our relationship with you properly. If you do not provide this personal information, these outcomes may not be possible. **If you provide us with information about other people (for example, your emergency contacts or beneficiaries), you must make sure that they know you are doing this and do not object to you giving us their information. You should also make them aware of this privacy notice.**

**We collect personal information from you** if you provide this in the course of your membership of a Scheme, or as a beneficiary of a Scheme, or through any other interaction with us generally, including by phone, by email, through our websites, on our apps, by post, by filling in application or other forms, on social media or face-to-face.

### **We collect personal information from people and organisations such as:**

- your agents (for example, a legal representative)
- your employer
- any service providers who work with us in relation to your membership
- your doctor, occupational health provider or other health care professionals to enable us to make decisions about your rights to benefits where certain medical criteria need to be met (for example, early retirement due to ill-health)
- our agents (for example, our legal representatives if we are involved in legal proceedings against you), our advisers, insurers and reinsurers
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- the police and other law-enforcement agencies to help them perform their duties, or with others if we have to do this by law or under a court order; and
- sources which are available to the public

## 4. Types of personal information

We process the following types of personal information about you and (where this applies) your dependants.

- **Standard personal information** (for example, information we use to contact you, identify you or manage our relationship with you).
- **Special categories of information** (for example, health information in connection with ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

- Where applicable, we also collect information about your dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.
- While much of the data we hold has been provided by members themselves, in some cases, we will collect personal information about you indirectly from the Bupa entity which is (or was) your employer and from our service providers (e.g. the Scheme administrator). In certain circumstances, we receive personal data from other schemes from which members have transferred, HMRC, the DWP and regulatory bodies and by tracing organisations. We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death.

#### **Standard personal information includes:**

- contact information (for example, your name, username, address, email address and phone numbers).
- the country you live in, your age, your date of birth, next of kin, dependants and national identifiers (for example, your National Insurance number or passport number).
- information relating to your benefits such as your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings and pensionable earnings, the category and value of benefits that you have built up or receive, and relevant matters impacting your benefits such as voluntary contributions, fund value, investment choices, pension sharing orders, tax protections or other adjustments.
- financial details (for example, your National Insurance number, payment details and bank details);
- information provided in order to allow us to assess your entitlement, e.g. copies of passports and certificates, as well as data received from Her Majesty's Revenue and Customs in order to allow us to calculate your guaranteed minimum pension.
- some employment information, such as location, department and redundancy details.

#### **Special category information includes:**

- information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you). We will in most circumstances process this data in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation).
- information about your race, ethnic origin and religion (where this information may be included in identity or employment documentation which we process about you).

#### **5. What we use your personal information for:**

We process your personal information to:

- manage your membership of your scheme and communicate with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;
- administer the Schemes, such as: to record, calculate and pay benefits; for reviews we or our administrators conduct for statistical and reference purposes; and for other administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you and to prevent fraud;

- investigate or prevent crime, to exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the people and organisations we work with;
- improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- undertake activities from time to time to help us manage the risks and liabilities of the Schemes, such as longevity hedging, actuarial valuation, insuring Scheme liabilities with an insurer, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.
- take part in, or be the subject of, any sale, merger or takeover of all or part of the Bupa business; and
- consider and act upon whistleblowing reports we receive, as set out in our *Speak Up Policies* (available [by contacting us](#)).

## 6. Legal grounds

By law, we must have a lawful reason for processing your personal information. These are set out below.

**Standard personal information:** We process standard personal information about you if:

- it is necessary to meet the obligations set out in a contract or to take steps before entering into a contract – if we have a contract with you, we will process your personal information to fulfil that contract.
- it is necessary to meet our legal or regulatory responsibilities, such as to carry out the terms of the trust, in accordance with its governing documents, and to make disclosures to authorities, regulators or government bodies.
- it is in our own or a third party's legitimate interests (see below for more details).
- we have to or are allowed to do so by law.

**Special category information:** We process special category information about you if:

- in limited circumstances, we obtain your consent from time to time, such as when you ask us to make disclosures or allocate benefits or where the Scheme rules require you to provide information which requires consent. Where the processing is based on consent, it can be withdrawn at any time (which will not affect the lawfulness of processing before such withdrawal). Please note that if consent to process information is withdrawn, we will not be able to take the relevant information into account.
- it is necessary for carrying out our obligations and exercising specific rights under employment, social-security or social-protection law (for example, we process health and disability information in connection with managing ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).
- it is necessary to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to administer your contributions and benefits or record or calculate or pay your or your beneficiaries' benefits.
- it is necessary in the vital interests of you or another person.

- you have obviously made that personal information public (for example, you publicly share sensitive personal information on the intranet).
- it is necessary for establishing, exercising or defending legal claims.
- it is in the public interest, in line with local laws.
- it is necessary for the purposes of occupational medicine, including to assess whether you are able to work.

## 7. Legitimate interest

Legitimate interest is one of the legal reasons why we may process your personal information. Taking into account your interests, rights and freedoms, the types of legitimate interest which allow us to process your personal information include:

- to provide our members and beneficiaries with support on a full range of pension related matters, and to otherwise manage our relationship with you, our business and people and organisations who provide services on our behalf and administer the Schemes.
- to protect our (or other people's) rights, property or safety, including to protect the health, safety and welfare of workers, and to maintain a safe working environment.
- to exercise our rights, to defend ourselves from claims and to keep to laws and regulations that apply to us and the people and organisations we work with.
- to take part in, or be the subject of, any sale, merger or takeover of all or parts of the Bupa business.

## 8. Sharing your information

We share your information, for the purposes set out in this privacy notice, with:

- our suppliers, including the Bupa Group and other providers of services to us and them
- advisers including the Scheme Actuary, Scheme Auditor, investment consultants, medical advisers, payroll providers, banks, AVC providers, electoral providers for trustee elections, and consultants.
- our insurers, insurance and reinsurance companies.
- our agents (for example, our legal representatives, translators, interpreters and tax advisers in line with the law).
- suppliers who help deliver products or services on our behalf.
- people or organisations we have to, or are allowed to, share your personal information with by law (for example, for fraud-prevention or safeguarding purposes, including with social-security and tax offices).
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.
- the police and other law-enforcement agencies to help them perform their duties, or with others if we have to do this by law or under a court order.
- if this applies, potential buyers of all or part of our business.
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others (e.g. the

Pensions Regulator, the Pensions Ombudsman, HMRC, the police, courts and our legal advisers/representatives) and legal advisors (to provide us with legal advice).

- proposed beneficiaries, who may become eligible to a benefit on a member's death.

If we share your personal information, we will make sure appropriate protection is in place in line with data-protection laws.

### Transferring information outside the UK and the European Economic Area (EEA)

The use and disclosure of your information for the purposes referred to in Privacy Notice may involve transferring your information to countries outside the UK and the EEA (the EU member states plus Norway, Lichtenstein and Iceland), for the purposes set out in this privacy notice.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, the Trustees will ensure that transferred information is appropriately protected in line with data-protection laws. Often, this protection is set out under a contract with the organisation who receives that information. For more information about this protection, please contact the relevant Scheme Trustee.

### 9. How long we keep your personal information

In general, we will keep your information until after your membership of the Scheme ends. Once your membership ends, we may decide to delete some or all of the data held in relation to you after 6 years. However, information will be held for longer where we consider it appropriate in order to deal with any queries which may arise, and ensure that everyone receives the correct pension and also that, in the event of a member's death, their dependants are paid the correct benefit. We will need to hold personal data for many years, probably until long after your own death and any dependant's pension ceases.

We use the following criteria to help us decide how long we need to keep your personal information for.

- Whether you are currently a member or beneficiary of the Schemes.
- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- Any periods for keeping information which are set by law or recommended by regulators, professional bodies or associations.
- Any time limits for making a claim.
- Any tribunal, court or other relevant proceedings that apply.

At the end of the retention period decided, we will securely and permanently delete the personal information in your file. If you would like more information about how long we will keep your information for, please contact the relevant Scheme Trustee (see *Trustee contacts* below).

### 10. Your rights

Under UK and European data-protection laws, you have the following rights relating to the information we hold about you in some computer and paper records.

- **Right of access:** You have the right to make a written request for details of the personal information we hold about you and a copy of that personal information.
- **Right to rectification:** You have the right to have inaccurate information about you corrected.
- **Right to erasure ('right to be forgotten'):** You have the right to have certain personal information about you deleted from our records.

- **Right to restriction of processing:** You have the right to ask us to use your personal information for restricted purposes only.
- **Right to object:** You have the right to object to us using personal information.
- **Right to data portability:** You have the right to ask us to transfer personal information you have given us to you or someone else in a format that can be read by computer.
- **Right to withdraw consent:** We do not normally rely on permission to allow us to process your personal information. We will only ask for your permission in very limited circumstances and, if we do so, we will make it obvious to you when we are asking for permission and what it is for. You have the right to withdraw any permission you have given us to handle your personal information. If you withdraw your permission, this will not affect the lawfulness of how we used your personal information before you withdrew your permission.

These rights may not apply in all cases. If we are not able to meet your request, we will explain why. If you make a request, we will ask you to confirm your identity if we need to, and to provide information that helps us to understand your request better. If you would like more information about your rights, or to exercise any of your rights, please contact the relevant Scheme Trustee (see *Trustee contacts* below).

## 11. Data-protection contacts

If you have any questions, comments, complaints or suggestions relating to this notice, or any other concerns about the way in which we process information about you, please contact our Data Protection Officer and Privacy Team at [dataprotection@bupa.com](mailto:dataprotection@bupa.com).

You also have a right to make a complaint to your local privacy supervisory authority. Our main office is in the UK, where the local supervisory authority is the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
United Kingdom  
SK9 5AF

Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

You can also make a complaint with another supervisory authority which is based in the country or territory where:

- you live;
- you work; or
- the matter you are complaining about took place.

## 12. Trustee contacts

### The Bupa Pension Scheme

The Trustee of the Bupa Scheme  
Bupa Pension Scheme Trustees Limited c/o Bupa Pensions  
Bupa Place  
102 The Quays  
Salford Quays  
M50 3SP  
[pensions@bupa.com](mailto:pensions@bupa.com)  
Tel: 0161 240 4357

### **The Cromwell Hospital Retirement Benefits Plan**

Kim Mairs  
XPS Pension Group  
1<sup>st</sup> Floor  
Flax House  
83-91 Adelaide Street  
Belfast  
BT2 8FE

[cromwell.admin@xpsgroup.com](mailto:cromwell.admin@xpsgroup.com)

### **The Bupa Home Healthcare Limited Pension Scheme**

Kim Mairs  
XPS Pension Group  
1<sup>st</sup> Floor  
Flax House  
83-91 Adelaide Street  
Belfast  
BT2 8FE

[bhh.admin@xpsgroup.com](mailto:bhh.admin@xpsgroup.com)