THE SCOTTISH ENTERPRISE PENSION AND LIFE ASSURANCE SCHEME

PRIVACY NOTICE

We are the **trustees** of the **pension scheme**. If you are a **member** or **beneficiary** of the **pension scheme** we hold **personal data** about you, including details of your pension.

Here is a list of the current **trustees**:

- Brenda Margaret Rankin;
- Catherine Mary Corr;
- Clair Yvonne Alexander;
- David William Haworth Walton;
- Derek Ballantyne;
- Gordon McLarnon;
- Julia Caroline Miller;
- Laura Birch;
- Leah Pape; and
- Ross McKie.

There is a **glossary** at the end of this notice to help you understand the words in bold used in this privacy notice.

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Introduction

We have prepared this notice to explain:

- why we hold your **personal data** and how we use it
- the **personal data** we collect about you (either as a **member** or as a **beneficiary**)
- how we collect your **personal data**
- who we share **personal data** with; and
- your rights about your **personal data**.

The **trustees** are **controllers** of your **personal data.** This means that we are responsible for deciding what pensions-related **personal data** to collect about you and why and determining who the **personal data** is shared with and why. We are also responsible for making sure that the **personal data** is kept secure and is not used for unlawful purposes.

The **scheme actuary** will sometimes be a joint **controller** of your **personal data** alongside us. The **scheme actuary** needs to use your **personal data** to help us work out how much funding the **pension scheme** needs and also to calculate benefits. The current **scheme actuary** is Calum Cooper of Hymans Robertson.

Hymans Robertson also provides actuarial and consultancy services for the **pension scheme**, either through the **scheme actuary** or in its own right, and when doing so it also acts as joint **controller** alongside us and the **scheme actuary**.

For more information on the **scheme actuary's** and Hymans Robertson's use of your **personal data** please visit: https://www.hymans.co.uk/scheme-member-privacy-notice

Why do we hold your personal data?

Data protection law requires us to have legal grounds for using your **personal data**. Our legal ground is that we have a "legitimate interest" in using your **personal data**, and that is to make sure the **pension scheme** is run properly and that you receive the correct benefits from it. Specifically, we will use your **personal data** for the following reasons:

- to make sure the **pension scheme** is run properly
- to pay the correct pension or lump sum to you and/or your **beneficiaries**
- to make sure that the **pension scheme** is properly funded
- to make sure that you can get information and updates about the **pension scheme** where necessary; and
- to make sure that the **pension scheme** complies with the law.

We may also use your **personal data** where we have what is referred to as a **Recognised Legitimate Interest**, which is a legitimate reason to process **personal data** which has been formally recognised by the UK Government in **data protection law**. We would have a **Recognised Legitimate Interest** where processing is necessary:

- to share information with a public body when they need it for their public task or official function (such as responding to a request from the police);
- to prevent, detect or investigate crime (such as fraud prevention); or
- to protect the physical, mental or emotional well-being of people who need extra support (such as children or vulnerable adults).

We do not use your **personal data** for any other purpose. If we need to use your **personal data** for an unrelated reason, we will contact you to explain this.

What personal data do we hold?

If you are a **member** or a **beneficiary** of the **pension scheme**, we collect, use, store and transfer different kinds of **personal data** about you, including:

- your title, first name, last name and any previous names
- gender
- contact details, including your home address, email address and telephone numbers
- date of birth
- marital status
- banking details such as your account number and sort code if we need to pay you, for example if you are a pensioner; and
- **pension scheme** information, for example your retirement age, contributions and benefits.

In addition, if you are a **member** we will also hold some information about your employment with Scottish Enterprise (SE), for example:

- national insurance number
- salary history; and
- length of service and any part time service.

In rare cases (for example, ill-health early retirement or gender re-assignment) we may need to hold **special categories of personal data** about you. Where we collect this type of information about you, we will follow the requirements for **special categories of personal data** under **data protection law**. Generally, our legal basis for using **special categories of personal data** is because it is necessary to carry out our obligations in relation to employment, social security and social protection. However, there are limited circumstances where we rely on other legal grounds to use **special categories of personal data**. For example, we can use **special categories of personal data** with your explicit consent, or to protect against fraud (eg. where you are requesting a health-related benefit) or where necessary in relation to legal proceedings (eg. to defend our position if you were to make a claim against the **pension scheme**).

How do we collect your personal data?

If you are a **member**, we receive your **personal data** from SE. If you are a **beneficiary**, we receive your **personal data** either from you or from someone on your behalf. We collect this **personal data** when you become a **member** or **beneficiary** of the **pension scheme**.

The **administration team** at Hymans Robertson manages the day to day running of the **pension scheme**. In addition, SE provides pension management services for the day to day running of the pension scheme, through the **pensions manager**.

The **administration team** and SE (through the **pensions manager**) may also receive your **personal data** from:

- you or from someone on your behalf
- HMRC or other government bodies, for example the Department for Work and Pensions; or
- medical professionals, for example if you are requesting ill health early retirement.

Who else receives or uses your personal data?

The **administration team** and SE (through the **pensions manager**) use your **personal data** on our behalf in the day to day running of the **pension scheme.** This makes the **administration team** and SE **processors** of your **personal data** under **data protection law** (but we remain the **controller**).

We also work with other organisations who may occasionally need to access your **personal data**, which are set out below. We do this to make sure the **pension scheme** is run properly. The **administration team** will only give your **personal data** to these other organisations if we tell them to.

To make sure the **pension scheme** is run properly, we may share your **personal data** with:

- SE, as the **pension scheme's** employer; and
- the **pension scheme's** service providers and advisers including lawyers and auditors.

We may also occasionally share your **personal data** with:

- regulators, governments, law enforcement and tax authorities (in the UK or the country you live in)
- courts and tribunals (in the UK or the country you live in)
- insurance companies (for example, if we arrange for all or part of your pension to be paid by an insurance company); and
- people or organisations involved with any reorganisation of the **pension scheme** or SE in the unlikely event that either the **pension scheme** or SE needs to be reorganised.

We also share your **personal data** with third parties (including the Money and Pensions Service) with whom we are required to share your **personal data** in order to meet our legal obligations in connection with the Pensions Dashboard Programme.

We make sure that all third parties keep your **personal data** secure and look after it in accordance with the law. Generally, we do not allow our third-party processors (such as the **administration team** and SE) to use your **personal data** for their own purposes and only let them process your **personal data** for specific purposes and in line with our instructions. However, where we have a **Recognised Legitimate Interest** in sharing your **personal data** with a third party, like assisting the police with their enquiries, the third party will be entitled to use your **personal data** for their own purpose.

How long is your personal data held?

We will hold your **personal data** for as long as we have a reason to (see "why do we hold your **personal data**?" above). We might need to hold your **personal data** after you have left the **pension scheme** or stopped receiving any pension from it, for example, to prove that the **pension scheme** no longer needs to provide you with a pension or lump sum.

Here are some of the things we will consider when deciding how long we will hold your **personal data**:

- the amount, nature and sensitivity of the **personal data**
- how likely it is that the unauthorised use or release of your **personal data** would be harmful
- why we need to use it including whether we could do this another way; and
- **data protection law**.

Will your personal data be kept in the UK?

We may transfer your **personal data** out of the UK where necessary to help us administer your pension benefits. If we do, we will make sure that any **personal data** we transfer meets the special requirements for international transfers under **data protection law**.

We may also transfer your **personal data** out of the UK if you ask us to, for example, if you move abroad and want to receive your pension in your new country of residence.

Data security

We have security measures in place to stop your **personal data** from being accidentally lost, changed or disclosed, or used in an unauthorised way. We also only let your **personal data** be used by those people who need it to make sure the **pension scheme** is run properly and you receive the correct benefits, or where an organisation or individual has a **Recognised Legitimate Interest** in having the information. Where we instruct third parties to process your **personal data** on our behalf, they will only do so on our instructions and they are required to keep your **personal data** private.

We have put in place procedures to deal with any suspected **personal data** breaches and will let you and the appropriate authorities know of a breach where we are legally required to do so.

Automated Decision-Making

We will not use your **personal data**, and we won't provide your **personal data** to third parties, for any automated decision-making process. Automated decision-making is the process of making a decision by automated means without any human involvement.

What data protection rights do you have?

Here are your data protection rights. You can:

- ask for information about the way your **personal data** is processed
- ask for a copy of your **personal data** (commonly known as a "subject access request"). This allows you to receive a copy of the **personal data** we hold about you, to check that we are lawfully processing it or to use it for your own purposes or for different services
- ask that your **personal data** is corrected if it is inaccurate or out-of-date
- ask for your **personal data** to be deleted
- object to processing of your **personal data**. In some cases, we may be able to show that our need to process your information overrides your right to object.
- object to the processing of your **personal data** for direct marketing purposes
- ask for your **personal data** to be transferred to you or to a third party
- ask us to restrict processing your **personal data**; and
- withdraw your consent to the use of **special categories of personal data** we hold about you, if you have previously given it.

If you chose to exercise some of these rights, such as deleting your **personal data,** restricting our ability to process it or withdrawing your consent to the use of **special categories of personal data** to consider an ill health application you have made, we may no longer be able to provide you with the benefits to which you are or may be entitled.

Your right to complain

Please contact us at dataprotection@hymans.co.uk if you have a complaint about how the **pension scheme** has handled your **personal data** (see “How can you get more information or exercise your rights?” below).

If you’re not satisfied with our response and you think your data protection rights are violated, you have the right to complain to the Information Commissioner’s Office (the ICO).

You can write to the ICO at:

Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

You can also call 0303 123 1113 or visit the ICO’s website at ico.org.uk.

Complaints about our handling of your **personal data** do not need to be considered under the **pension scheme**’s separate Internal Dispute Resolution Procedure (IDRP) before being referred to the ICO.

Where a complaint includes both issues about your **personal data** and matters relating to **pension scheme**'s administration or your benefits, the different elements of your complaint will be considered separately under the procedure applicable to each element.

How can you get more information or exercise your rights?

Please let us know if you would like to:

- see the information we hold about you
- exercise your data protection rights, including making a complaint; or
- ask for **personal data** to be corrected if it is inaccurate or out of date.

You can contact us by emailing scenadmin@hymans.co.uk or calling 0141 566 7655. You can also write to us at:

The trustees of the Scottish Enterprise Pension and Life Assurance Scheme
Hymans Robertson
20 Waterloo Street
Glasgow
G2 6DB

You can contact SE by emailing michael.wright1@scotent.co.uk or calling 0141 468 5254. You can also write to SE at:

FAO Michael Wright
Pension Manager
Scottish Enterprise
Atrium Court
50 Waterloo Street
Glasgow
G2 6HQ

Changes to the privacy notice and informing us of changes to your personal data

We can update this Privacy Notice at any time, but we will provide you with a new Privacy Notice if we make significant changes. We may also tell you in other ways from time to time about the processing of your personal information.

It is important that the **personal data** we hold about you is accurate and current. Please keep us informed if your **personal data** changes during your relationship with us.

Last updated 17 August 2026

Glossary

Administration team	The team at Hymans Robertson who manage the day to day running of the **pension scheme**.
Beneficiary	Any person other than a **member** who is entitled to a pension and/or lump sum from the **pension scheme** (for example, a deceased **member's** spouse or civil partner).
Controller	A person under **data protection law** who decides what **personal data** to collect about you and why, and determines who your **personal data** is shared with and why. They have special duties under **data protection law**.
Data protection law	UK law relating to privacy and data protection
Member	Any person who is entitled to a pension and/or lump sum from the **pension scheme** as a result of their employment with SE.
Pension scheme	The Scottish Enterprise Pension and Life Assurance Scheme.
Pensions manager	An employee of SE who manages the day to day running of the **pension scheme** alongside the **administration team**.
Personal data	Information about you from which you could be identified.
Processor	A person who uses your **personal data** to carry out tasks on behalf of a **controller.**
Recognised Legitimate Interest	A legitimate reason to process **personal data** which has been formally recognised by the UK Government in **data protection law**.
Scheme actuary	The person appointed by the **trustees** to work out how much funding the **pension**

	scheme needs and to carry out complex benefit calculations. The current scheme actuary is Calum Cooper of Hymans Robertson.
Special categories of personal data	These are categories of **personal data** which are especially sensitive and subject to special protections under **data protection law**, for example health data and information on gender re-assignment.
Trustees	The people who are responsible for running the **pension scheme.**