

Privacy notice for the People's Partnership group



Please keep this booklet safe

Privacy notice for the People's Partnership

Who is this privacy notice from?

As required by data protection law, this privacy notice gives you information from the data controllers who use your personal data regarding a People's Partnership product or service. People's Partnership was formerly known as the B&CE group.

Different data controllers in People's Partnership may be using your personal data. A data controller is responsible for the way your data is stored and used – and for how long.

In this privacy notice, 'we' means the data controllers in People's Partnership.

Why are you receiving this privacy notice?

You may be a member or policyholder of one of our pension or insurance products because you work, or used to work, for one of the many employers who used a People's Partnership product. Or you may have been a member or policyholder of one of our pension or insurance products that is now closed.

If you work or have worked in construction services, you may be a beneficiary of Construction Worker's Charitable Trust. You may also be an employer, adviser or intermediary who has enrolled employees into one of our products or looks after the account.

Or, you may be a third party who is acting on behalf of, or providing information about a Construction Worker's Charitable Trust applicant.

Which companies does the privacy notice apply to?

- B&CE Insurance Limited (B&CEIL)
- People's Administration Services Limited (PASL)
- Building & Civil Engineering Benefits Scheme Trustee Limited (B&CEBSTL)
- Construction Workers' Charitable Trust

Data controller

People's Partnership has a number of data controllers – this depends on the product or service you have or had with us.

Product or service	Data controller
<ul style="list-style-type: none">• Employee Accident Cover• Life Insurance Protection Policy (closed to new business)• EasyBuild Stakeholder Pension (closed on 30 March 2020)• RapidCash Injury Insurance (closed on 30 September 2020)• Personal Accident Insurance (closed on 30 September 2020)	B&CE Insurance Limited
<ul style="list-style-type: none">• Employee Life Cover• Building and Civil Engineering Benefits Scheme (covering LSRB and AVCs) (closed to new members)	Building & Civil Engineering Benefits Scheme Trustee Limited
<ul style="list-style-type: none">• Construction Workers' Charitable Trust applications	Construction Workers' Charitable Trust

What is the privacy notice about?

The privacy notice explains how People's Partnership group of companies use any personal data they collect from you, employers and any third parties acting on your behalf. If you use our websites or web-based services, you may also be interested in our cookies policy and social media policy.

What personal data do we hold about you?

Information you give us

We may receive personal information about you when you contact the People's Partnership by doing any of the following:

- Contacting us to manage your product or service
- Applying for a service or product
- Contacting us via our website, social media, webchat, phone, email, post or otherwise
- Taking part in market research such as surveys and questionnaires
- Attending worksite presentations, roadshows, or other events
- Participating in competitions and promotions we may run

The information you give us about you (and related parties) may include the following:

- Your name, date of birth, gender, National Insurance number and employee unique ID
- Contact details, including your address, phone number and email address
- If your benefits from the scheme derive from your employment – details of your employer when you were building up an account in the scheme, how long you worked for them and your salary from time to time
- Whether you are married or in a civil partnership and other information we might need to pay any death benefits concerning you
- If your benefits form part of a financial settlement (ordered as part of a divorce or dissolution of civil partnership) – details of that settlement
- Health details
- Financial information, retirement information and bank details
- Information on how you use this website, such as your IP address, browser information and geographical location

Information we receive from other sources

If your employer offers or offered one of our products or services, we receive personal data about you from them or their business or payroll adviser. This may be to enrol you in a pension or one of our benefit schemes and may include your contact details, date of birth, gender, employment details, National Insurance number, health details and financial information.

We may receive personal data from professional bodies (such as medical professionals), referring bodies (such as advice bureaus), and from people acting on your behalf.

You will give us your personal data in beneficiary nominee forms. Personal data about your dependants, other beneficiary nominees and death-in-service nominees, will also be given by you or your representative. If you give us information about another person, you confirm by doing so that they have given you permission to provide it to us and for us to be able to process their personal data, including any sensitive or special category personal data. You confirm that you've told them who we are and what we will use their data for, as set out in this notice.

We also work closely with several third parties, including anti-money laundering service providers, credit-checking companies, analytics providers, software providers or payroll providers, and regulatory authorities or government departments, and may receive information about you from them.

The special categories of data we may collect about you are as follows:

- Racial/ethnic origin – as part of identification checks
- Trade union membership – this may be collected by the Construction Workers' Charitable Trust, as referrals may be made by the trade union
- Physical or mental health, and other medical information – health information may be collected if it is relevant to payment of benefits from a scheme or from the Construction Workers' Charitable Trust
- Sexual life and preferences – details about personal relationships are collected to determine who should receive benefits on your death, or may be collected by the Construction Workers' Charitable Trust if you disclose it in your application

In some instances, personal information may also include criminal allegations or convictions, financial and bank account numbers, or unique identifiers such as driver's licence and passport numbers, which help to confirm your identity.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

How we use the information about you

Data protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside of People's Partnership.

The law says we must have one or more of these reasons:

- to carry out our obligations under any contracts between you and us or your employer, or
- when it is our legal duty, or
- when it is in our legitimate interest, or
- when you consent to it.

When we have a business or commercial reason of our own to use your information, this is called a 'legitimate interest'. We will tell you what that is, if we are going to rely on it as the reason for using your data. Even then, it must not unfairly go against your interests.

We use your personal data:

- to administer a product or service to meet legal and statutory requirements
- to carry out our obligations under any contracts between you and us or your employer, and provide you with services and information that you request from us
- to provide you with information or a service you have consented to receive.

Any legitimate interests pursued by us, or third parties we use, are as follows:

People's Partnership has a legitimate interest in ensuring we give you high-quality service. Given the long-term nature of the products and services we offer and the lifecycle and changing needs our customers will experience, People's Partnership may also send non-statutory communications or marketing campaigns that we have identified as relevant and of benefit to

you and your needs.

We may use your information for research or statistical purposes. These include analysing how people use our websites, view our products, respond to our advertising, interact with us via social media such as Twitter and Facebook, use any mobile apps, and improve our understanding of what customers need. Processing personal data for analysis purposes helps us to better understand your interests. It also enables us to tailor our communications to make them relevant and interesting to you. You can change your marketing preferences at any time. For further details see 'Managing your preferences'. You can also choose how cookies are enabled via our cookie consent pop up and via the cookie link on our webpage.

The law and other regulations treat some types of sensitive personal information as special. This includes information about racial or ethnic origin, sexual orientation, religious beliefs, trade union membership, health data, and criminal records. We will not collect or use these types of data without your consent unless the law allows us to do so. Sometimes there may be reasons of public interest or law that enables People's Partnership to use this information without consent, and we will do so if that is necessary for People's Partnership to run the scheme in a sensible way. You can withdraw your consent at any time by using the contact details given at the end of this notice. This may affect what we can do for you, unless we have another lawful reason for using your information.

Our legal basis for processing your data

The following sections list all of the ways that we may use your personal information and which of **B&CE Insurance Limited**

How we may use your personal data	Our reason	Our legitimate interest
Providing you with a service or product		
<ul style="list-style-type: none">• To manage our relationship with you or your business• To administer your application, account or policy and process your request and queries• To give you information about products and services we offer that are similar to and complement our current offering to you• To communicate with you about other products and services• To keep your details updated and reconnect with you if you move address	<ul style="list-style-type: none">• Your consent• Fulfilling contracts• Our legitimate interests• Our legal duty	<ul style="list-style-type: none">• Keeping our records up to date• Working out which of our products and services may interest you, telling you about them and understanding your needs• Seeking your consent when we need it to contact you• Tailoring our communications to make them relevant and of interest to you

How we may use your personal data	Our reason	Our legitimate interest
Business improvement		
<ul style="list-style-type: none"> For training purposes to improve our services, for example by recording telephone calls To monitor and improve the service we offer to you and our customers' experience, and study how our customers use our products and services 	<ul style="list-style-type: none"> Fulfilling contracts Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> To enhance the service we provide to you
Business operations		
<ul style="list-style-type: none"> As part of our business processes and relevant activities. These include auditing, business planning, accounting and transactions 	<ul style="list-style-type: none"> Fulfilling contracts Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> Being efficient about how we fulfil our contractual duties Complying with rules and guidance from regulators
Managing security, risk and crime prevention		
<ul style="list-style-type: none"> Sharing information as required to comply with judicial proceedings, court orders or legal process and to detect, investigate, report and seek to prevent financial crime To verify your identity and carry out anti-fraud checks To obey laws and regulations that apply to us 	<ul style="list-style-type: none"> Fulfilling contracts Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> Developing and improving how we deal with financial crime, as well as carrying out our legal duties in this respect Complying with rules and guidance from regulators
For processing special categories of personal data		
<ul style="list-style-type: none"> To verify your identity and carry out anti-fraud checks Processing claims on your benefits due to retirement or ill health, or on death Adding beneficiaries to your account Sharing information as required for regulatory or legal purposes 	<ul style="list-style-type: none"> Using health information as needed to provide you with our product and process your claims Your consent To help prevent and detect unlawful acts and fraudulent behaviour Our legal duty 	

The Building & Civil Engineering Benefits Scheme Trustee Limited

How we may use your personal data	Our reason	Our legitimate interest
Providing you with a service or product		
<ul style="list-style-type: none"> To manage our relationship with you or your business To administer your application, account or policy and process your request and queries To give you information about products and services we offer that are similar to and complement our current offering to you To communicate with you about other products and services To keep your details updated and reconnect with you if you move address 	<ul style="list-style-type: none"> Your consent Fulfilling contracts Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> Keeping our records up to date Working out which of our products and services may interest you, telling you about them and understanding your needs Seeking your consent when we need it to contact you Tailoring our communications to make them relevant and of interest to you
Business improvement		
<ul style="list-style-type: none"> For training purposes to improve our services, for example by recording telephone calls To monitor and improve the service we offer to you, our customers' experience and study how our customers use our products and services 	<ul style="list-style-type: none"> Fulfilling contracts Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> To enhance the service we provide to you
Business operations		
<ul style="list-style-type: none"> As part of our business processes and relevant activities. These include auditing, business planning, accounting and transactions 	<ul style="list-style-type: none"> Fulfilling contracts Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> Being efficient about how we fulfil our contractual duties Complying with rules and guidance from regulators
Managing security, risk and crime prevention		
<ul style="list-style-type: none"> Sharing information as required to comply with judicial proceedings, court orders or legal process and to detect, investigate, report and seek to prevent financial crime To verify your identity and carry out anti-fraud checks To obey laws and regulations that apply to us 	<ul style="list-style-type: none"> Fulfilling contracts Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> Developing and improving how we deal with financial crime, as well as carrying out our legal duties in this respect Complying with rules and guidance from regulators

The Building & Civil Engineering Benefits Scheme Trustee Limited

Continued

How we may use your personal data	Our reason	Our legitimate interest
For processing special categories of personal data		
<ul style="list-style-type: none"> To verify your identity and carry out anti-fraud checks. Processing claims on your benefits due to retirement or ill health, or on death Adding beneficiaries to your account Sharing information as required for regulatory or legal purposes 	<ul style="list-style-type: none"> Using health information as needed to provide you with our product and process your claims with your consent To help prevent and detect unlawful acts and fraudulent behaviour Our legal duty 	

Construction Workers' Charitable Trust

How we may use your personal data	Our reason	Our legitimate interest
Providing you with a service or product		
<ul style="list-style-type: none"> To manage our relationship with you To administer your application and process your request and queries To share with other third parties who may assist with your application and queries, and help us provide a 24-hour service 	<ul style="list-style-type: none"> Your consent Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> Seeking your consent when we need it to contact you
Business improvement		
<ul style="list-style-type: none"> For training purposes to improve our services, for example by recording telephone calls 	<ul style="list-style-type: none"> Our legitimate interests 	<ul style="list-style-type: none"> To enhance the service we provide to you
Business operations		
<ul style="list-style-type: none"> As part of our business processes and relevant activities. These include auditing, business planning, accounting and transactions 	<ul style="list-style-type: none"> Our legitimate interests Our legal duty 	<ul style="list-style-type: none"> Complying with rules and guidance from regulators

How we may use your personal data	Our reason	Our legitimate interest
Managing security, risk and crime prevention		
<ul style="list-style-type: none"> • Sharing information as required to comply with judicial proceedings, court orders or legal process and to detect, investigate, report and seek to prevent financial crime • To verify your identity and carry out anti-fraud checks • To obey laws and regulations that apply to us 	<ul style="list-style-type: none"> • Fulfilling contracts • Our legitimate interests • Our legal duty 	<ul style="list-style-type: none"> • Developing and improving how we deal with financial crime, as well as carrying out our legal duties in this respect • Complying with rules and guidance from regulators
For processing special categories of personal data		
<ul style="list-style-type: none"> • To verify your identity and carry out anti-fraud checks • Using health information or other sensitive information such as past criminal offences as needed, to provide you with our service and assess your eligibility for a grant or to direct you to other benefit providers • Sharing information as required for regulatory or legal purposes 	<ul style="list-style-type: none"> • To help prevent and detect unlawful acts and fraudulent behaviour • Our legal duty 	

the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

Marketing

People’s Partnership will only use your personal data to manage your products or services and to communicate with you about information that may be of interest.

However, sometimes People’s Partnership would like to contact you with details of other products or services it provides. You can choose to receive these types of communications in our Preference Centre – see ‘Managing your preferences’, below.

Managing your preferences

People’s Partnership aims to ensure you only receive communications about information that is of interest to you or that enhances our services to you.

You can opt out of marketing or communications that are not required by law or not required to efficiently manage your product and service.

You may also opt out of certain data-processing activities such as research and data analysis.

To do this, contact us by using the contact details at the end of this privacy notice.

How we share your information

People's Partnership may share or disclose personal data when necessary to provide our services or conduct our business operations. When People's Partnership shares personal data, we do so in line with data privacy and security requirements. Sharing information enables us to better understand your needs and manage the product or service we provide to you in the most efficient way. If you want any more information from any of the recipients or to use any rights regarding the information they hold, please contact People's Partnership using the details at the end of this notice.

Below are the parties with whom we may share personal information and why.

Within the People's Partnership group of companies: Personal data may be shared with other companies in the People's Partnership group (you'll find a list of these at the top of this privacy notice). This allows us to efficiently provide administration, customer and technical support, legal and compliance, marketing and business and product development. All our employees and contractors must follow our data privacy and security policies when handling personal information.

Our third-party service providers: People's Partnership provides personal data to these third parties when they need it to fulfil their services to People's Partnership. Their services include:

- software, systems and platform support which can include telephony and call recording services
- print and mailing services
- data-quality services
- overflow call centre
- investment management
- archiving and destruction services
- auditors and actuaries
- cloud hosting services
- data analytics
- customer research services.

People's Partnership third-party service providers are not permitted to share or use personal information that People's Partnership makes available to them for any other purpose than to provide their service. When People's Partnership outsources any process, we will ensure any supplier or contractor has adequate security measures in place.

Third parties for legal reasons: People's Partnership will share personal information when we believe it is required, to comply with legal obligations and respond to requests from government agencies, including law-enforcement and other public authorities such as regulators. Personal information may also be shared with your employer or their adviser to administer your scheme.

Third parties with your consent: We may also share your personal data with someone else

where you have given your consent – for example, to discuss your details or refer you to another organisation for specialist advice.

Some of the people mentioned just use your personal data in the way the People's Partnership data controller tells them. However, others may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers in their own right. In this case, they are subject to the same legal obligations regarding this information as People's Partnership. The rights you have regarding your information apply to them too.

If you want any more information from any of these recipients or to exercise any rights regarding the information they hold, please contact People's Partnership and you will be put in touch with them.

Children's privacy and how the People's Partnership group approach this

Our products and services are generally not aimed at children. If, however, we collect and use information about children, we will comply with industry guidelines and applicable laws. Children's data may be collected if they are noted as beneficiaries or on charitable trust grant applications. We may ask for consent (including from a parent or guardian who is not the member) to process the child's personal data.

Security and safe storage of your personal information

Customer data held directly by People's Partnership is stored on secure servers in the UK. We do not transfer customer data outside the European Economic Area (EEA). People's Partnership holds data in various forms, including electronic databases and paper files. We take all reasonable steps necessary to ensure your data is adequately protected and processed in line with this privacy notice.

Member and employer customer records are held on People's Partnership's IT systems. These records are also replicated at its UK based Disaster Recovery (DR) site, and additional data backups are also remotely stored in fireproof safes at a secondary UK site. The DR site is operated by a specialist provider in Data & Recovery Centres who adhere to multiple ISO standards including ISO27001.

People's Partnership works with third-party suppliers during their business activities. Sometimes these suppliers need to receive and store data on People's Partnership's behalf. People's Partnership does detailed checks (due diligence) on these suppliers, which includes detailed questionnaires about their information security, data protection and encryption policies and procedures. Some of the people (this includes organisations) that People's Partnership shares your information with may process it overseas. This means your personal data may sometimes be transferred outside the UK and the EEA. Some countries already provide adequate legal protection for your personal data. In other countries, additional steps will be needed to protect it.

If we do transfer your personal data outside of the EEA we will make sure it is protected to the same extent as in the EEA such as:

- Transfer it to a non-EEA country with privacy laws that give the same protection as UK GDPR or the EEA.
- Put in place a contract with the recipient that they protect it to the same standards as the UK GDPR or the EEA.

We take data security seriously. Our information security policies and procedures are closely aligned with widely accepted international standards. They are reviewed regularly and updated as necessary to meet our business needs, changes in technology and regulatory requirements.

We will retain and process your personal information to comply with our legal obligations, pay any benefits due to you or concerning you, resolve disputes, evidence claims and relationships and to enforce our agreements. We will keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it. If we keep data as evidence of the payment of a claim or transfer, we will archive it and reduce it to the minimum we need to allow us to identify and confirm the payment.

When we no longer need personal information, data will be disposed of or minimised. This will happen in line with approved company processes to ensure all reasonable efforts and precautions are taken to protect the confidentiality of the data. People's Partnership keeps a data retention policy which details the required timescales for the documents and data it processes.

How you can help to keep your personal data up to date

People's Partnership needs to ensure that your personal data is accurate and up to date. Please tell us if your details change (for example, if you move address). In addition, you have rights under data protection law to have inaccurate personal data corrected and incomplete data completed. For more details about rights, please see below.

Your rights as a data subject

You have the right to lodge a complaint directly with the supervisory authority, the Information Commissioner <https://ico.org.uk> who can be contacted on 0303 123 1113. You may be asked to provide proof of identity when making these requests. You have other rights under data protection law that you can exercise against People's Partnership, but please note that these will not apply in all circumstances. You can exercise those rights free of charge except in some very limited circumstances, which will be explained to you where relevant.

For more information about all these rights and how to exercise them, please contact People's Partnership who will be able to tell you more. Short descriptions of your rights are as follows:

Right of access – you have a right to request access to your personal data, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how it is processed.

Right of rectification (correction) – in certain circumstances you have a right to ask for your personal data to be corrected if it is inaccurate, and completed if it is incomplete. Where your personal data in question has been disclosed to organisations, they must be informed of the rectification if possible.

Right to be forgotten – in certain circumstances you can ask to have your personal data erased. It may not always be possible to accept your request where, for example, People's Partnership has a legal duty to retain or process your information.

Right to restriction of processing – where certain conditions apply, you have a right to restrict the processing of your information. This includes:

- When you contest it as being inaccurate (until the accuracy is verified).
- Where you have objected to the processing (where it was necessary for legitimate interests) and People's Partnership is considering whether its legitimate interests override your own.
- If you consider that the processing is unlawful (and if this is true) so that you can oppose erasure and request restriction instead.
- If People's Partnership no longer need the personal data for the purposes they held it but you require them to continue to hold it to establish, make or defend legal claims.

Right of portability – in certain circumstances, you have the right to move, copy or transfer your personal data to another organisation or to yourself. This right is only relevant if personal data is being processed based on a consent (or to perform a contract) and is done automatically. This right is different from the right of access, and the types of information you can get under the two separate rights may be different. Using the data portability right, you cannot get all the personal data you can get using the right of access.

Right to object – you have the right in certain circumstances to object to certain types of processing of your personal data where it is based on legitimate interests, where it is processed for direct marketing (including profiling relevant to direct marketing), or where it is processed for the purposes of statistics.

Automated decision making – People's Partnership may profile your data for marketing and communication purposes, which you can opt out of. We do not carry out any automated decision-making that would have legal or other significant effects on you. You can also withdraw consent if you have provided it and if this is being relied on as the legal basis for using your personal data.

Changes to our privacy notice

This notice is dated 5th December 2023. We may amend it from time to time to keep it up to date or to comply with legal requirements.

You can visit bandce.co.uk/privacy-policy for the latest version of our privacy notice.

Contact us

If you wish to make a complaint, find out more information about how your personal data is being processed by or on behalf of the data controller(s), or exercise your rights, you can contact People's Partnership.

People's Partnership's Data Protection Officer, who is the Chief Risk Officer, will act as a point of contact for data protection queries about the controllers by liaising with them on your behalf.

You can write to the Data Protection Officer, Chief Risk Officer, Business Assurance Directorate, Manor Royal, Crawley, West Sussex, RH10 9QP.

For members of Employee Accident Cover, Personal Accident Insurance, Life Insurance Protection Policy, B&CE Benefits Scheme and Employee Life Cover, please email **info@peoplespartnership.co.uk** or call **0300 2000 555**.

Construction Workers' Charitable Trust, please email **cwct@bandce.co.uk** or call **0300 2000 600**.

For employers or advisers offering a People's Partnership product or service to your employees, please email **support@peoplespartnership.co.uk** or call **01293 586666**.