The National Trust Retirement and Death Benefits Scheme

The Trustee’s Privacy Notice

Version 2.0 (July 2026)

This Privacy Notice is for members and beneficiaries of the National Trust Retirement and Death Benefits Scheme (the “Scheme”). It has been prepared by The National Trust Retirement and Death Benefits Scheme Corporate Trustee Limited (the “Trustee” or “we”).

In line with the transparency requirements of applicable data protection laws, we are required as “Data Controller” to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This Notice is designed to give you that information.

This Privacy Notice replaces the previous version of this Privacy Notice and supplements any other notices and statements we issue that are specific to particular data collection or processing activities.

Why we collect personal data

There are two main reasons why we collect, store and use your data (this is called "processing"):

- The primary reason is to allow us to operate the Scheme. This includes working out your level of benefits (and those payable to your beneficiaries) and for calculating and managing the funding position of the Scheme. If we did not have this data we would not be able to administer the Scheme effectively. This means we process your data for the purposes of our "legitimate interests".

- Another reason we process your data is to comply with our legal obligations, for example to keep and maintain records about you, fulfil our obligations to HMRC and comply with our duties in relation to individuals using pensions dashboards.

The type of personal data we process

The type of personal data we may process could include, for example, your name and address, date of birth, gender, salary / pension details, National Insurance details, bank details, your email address, and other information collected through communication with yourself, your employer and your advisers. If you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, we may also process a “pensions identifier” in respect of you, which is a string of characters used to identify your specific benefits under the Scheme.

Occasionally, some of the data that you disclose to the Trustee may be sensitive personal data. For example, the Trustee may require you to provide information relating to your health. In the event that you are providing the Trustee with any sensitive personal data you will be asked to complete a consent form. This will enable the Trustee to process your sensitive personal data for the purposes set out in the form.

We may get this data from you or from your employer/previous employer and it may be collected on our behalf by another party (such as one of our advisers below).

The Trustee (and our advisers) may monitor, record, store and use any telephone, email or other communication with you in order to maintain a record of any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

How your information is collected and processed

Your personal data will generally be collected directly from you or from the employer. However, we may also receive personal data from other parties such as HMRC, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, 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. We will not collect any personal data that we do not need.

Your personal data will be processed for the purposes of operating the Scheme, including:

- Calculation of any benefits which you (or your beneficiaries) are entitled to receive from the Scheme under different scenarios (e.g. on leaving, retirement, death, ill-health, etc.)

- Provision of data to third parties which will allow them to fulfil their legal / commercial requirements (e.g. complete actuarial valuations / calculations, audit the Scheme, etc.)

- Allow us to be able to communicate with you and other members of the Scheme

- Meet our legal / regulatory requirements

- General management (including liability management exercises) of the Scheme

If you have used a pensions dashboard to access information about all of your pension benefits in the UK but are not a Scheme member, we will use your personal data to comply with our legal duties relating to pensions dashboards only. This includes using the personal data you have provided through the pensions dashboard or directly to us to check whether you are a Scheme member. If we find you are not a Scheme member, we will delete your personal data as required by pensions dashboards legislation.

Who will have access to your personal information?

To ensure the smooth running of the Scheme we may pass your personal data to third parties, including our professional advisers, insurers, third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, service providers where we believe it is in the legitimate interests of the Scheme and to regulatory bodies where legally required to do so. The National Trust, as an Employer, also assists the Trustee in administering the pension scheme (including the payment of pensions). Therefore, some employees at the National Trust (and their suppliers) also have access to your personal data, on a controlled basis.

Where possible, we will anonymise your data before it is shared with other parties.

Some of the parties we share your data with can determine how they process your data as they have a legitimate interest in doing so to provide us with advice (they are also called "data controllers"). These parties are currently:

- our actuarial and consultancy advisers Aon Solutions UK Limited – see their privacy notice here;
- our auditors Crowe U.K. LLP – see their privacy notice here; and
- our legal advisers Sacker & Partners LLP – see their privacy notice here.

These parties are subject to the same legal data protection requirements as us.

We confirm that we do not share your personal data with anyone for marketing purposes.

Security of Information

We take the security of your personal information very seriously. We, our preferred providers and the National Trust, have put in place appropriate technical and contractual measures to prevent the unauthorised access, improper use or disclosure, unauthorised modifications or unlawful destruction or accidental loss of your personal data once under our control. This includes regular training on data security issues and ensuring appropriate safeguards are in place to manage personal data appropriately (both inside and outside the European Economic Area).

Access to Information

As a member of the Scheme, you are entitled to know what personal information we hold that relates to you, the purpose for which we hold it and the identity of any person to whom it has been disclosed. You can write to us at any time to obtain a copy of this information and to have it corrected or removed if you think it is inaccurate. You may also have the right to object to our processing of your data and ask us to stop, or restrict, doing so. However, these rights may be limited due to the nature of a pension scheme.

Retention of your personal data

We must keep all personal data safe and only hold it for as long as necessary. We will keep your data while you are a member of the Scheme and while benefits are paid to you and your dependants. We expect to keep your data for the life of the Scheme itself, and at least a further 6 years thereafter. In particular, we will keep your data if we believe that the law or relevant authorities require us to do so, or that it is still reasonably required for the purposes of the Scheme.

In any case, we will keep your data for the minimum period required by law. This is generally 6 years from the end of the scheme year in which you leave the Scheme or stop receiving benefits from it (or your beneficiaries stop receiving benefits from it). However, where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction.

Your rights

You have a number of rights under data protection laws in relation to your personal data.

- **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 digital format.
- **Right to rectification** – if at any point you believe that the personal data we hold about you is wrong, 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 using the contact details 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 Trustee, to the Information Commissioner's Office, or to bring an action before the court, if your personal data rights are not complied with (see "Complaints procedure" below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, 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.

Keeping up to date

We may use your contact information to keep you updated about your pension benefits and the activities of the Scheme. We will not disclose your personal information to any other party or for any other reason, other than as set out above, without your prior consent.

We may update this privacy policy from time to time without notice to you. Any revised privacy policy will be made available on the Scheme's website:

https://www.nationaltrust.org.uk/who-we-are/retirement-and-death-benefit-scheme

If in doubt, please contact the Pensions Manager for the most recent version of this Privacy Notice using the contact details overleaf.

If you have any queries in relation to the above or wish to find out more about how to access your personal data, please contact:

The Pensions Manager
National Trust Retirement and Death Benefits Scheme
Heelis
Kemble Drive
Swindon
Wiltshire, SN2 2NA
Email: pensions@nationaltrust.org.uk

Complaints procedure

The Trustee operates an Internal Dispute Resolution Procedure (IDRP) for dealing with any complaints that arise between beneficiaries (or potential beneficiaries) of the Scheme and the Trustee.

The IDRP also constitutes the Trustee's process for handling data protection complaints. This applies if you consider that the Trustee has infringed data protection legislation because of the way the Scheme has handled your personal information (or the personal information of someone you are acting on behalf of). This could relate to, for example, the way it has responded to your subject access request, the security measures used to store your information, and how your information has been collected or used.

A copy of the Scheme's IDRP, which includes details of how to make a complaint, can be obtained either from the Pensions Manager using the contact details above or from the Scheme's website:

https://www.nationaltrust.org.uk/who-we-are/retirement-and-death-benefit-scheme

If your dispute relates to a data protection matter and you are not satisfied with the outcome of the IDRP, you can refer your data protection complaint to the **Information Commissioner's Office (ICO):**

Website:	https://ico.org.uk/
Webchat:	Available at: https://ico.org.uk/global/contact-us/contact-us-public/public-advice/
Telephone:	0303 123 1113

You may also wish to refer to the ICO for additional information and guidance.