

# Lucas/TRW Pensioners Association - Data Privacy Policy

## About this Policy

This policy explains when and why the Lucas/TRW Pensioners Association (LTPA) collects personal information about its' members, how that information is used, how it is kept secure and members rights in relation to that information.

The LTPA may collect, use and store personal data, as described in this Data Privacy Policy.

The LTPA reserve the right to amend this Data Privacy Policy from time to time without prior notice. Updates will be posted on the Association website – <http://www.lucaspensioners.org.uk/>

The LTPA will always comply with the General Data Protection Regulation (GDPR) when dealing with members personal data. For the purposes of the GDPR, the LTPA will be the "controller" of all personal data held about members.

Further details of the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)).

## What information is collected and why?

Members may or may not pay a subscription, depending on their type of membership. They have joined the association to be kept informed of matters pertaining to their pensions and other matters of mutual interest and to be able to contact the Association for help. Their data is used on the GDPR basis of legitimate interest. The LTPA have carried out a legitimate interest interpretation assessment, copies of which are available on request\*.

Type of Information	Purpose	Legal Basis of Processing
Name of member and spouse, address, email (if applicable), phone numbers (optional) and principal place of Lucas/TRW employment.	Provision of pension news in all its forms and other matters of mutual interest.	*Legitimate interest
Date joined, date subscription paid and amount and method of payment. (No card or bank details are stored)	Management of subscriptions	*Legitimate interest
Details of Pension Provider	Ability to target information concerning pensions provided by the TRW Pensions Plan or Legal & General plc or other providers.	*Legitimate interest

### **How is personal data protected?**

The LTPA will not transfer members personal data to any third party without their consent.

The LTPA has implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. Members are expected to be aware that information transmitted over the internet can never be guaranteed to be 100% secure.

The LTPA does not process payments online and does not store card or bank details.

In the event of any breach of a member's personal data, the LTPA will endeavour to notify the member immediately.

### **Who has access to the information provided to the LTPA?**

The LTPA will never sell nor share member's personal data with any third parties without prior consent (which members are free to withhold) other than to communicate to members via a postal mailing agency (see below) or to comply with any legal obligation.

The LTPA will from time to time use a postal mailing agency in order to communicate by post with members. The Association will ensure that any such agency will be entirely compliant with the GDPR.

### **How long is membership information retained?**

The LTPA will hold members personal data until a member formally ceases to be a member of the Association. The LTPA will periodically review all data held to ensure compliance with the GDPR.

### **Members rights under the GDPR**

Members are entitled:

- (a) to access their personal data
- (b) to be provided with information about how that personal data is processed
- (c) to have their personal data corrected
- (d) to have their personal data erased in certain circumstances
- (e) to object to or restrict how their personal data is processed
- (f) to have their personal data transferred to themselves or to another business in certain circumstances.

Members have the right to take any complaints about how the LTPA process their personal data to the Information Commissioner: <https://ico.org.uk/concerns/> 0303 123 1113.

### **Website**

The Association website use cookies to distinguish members from other users of it's website. This helps the LTPA to provide members with a good experience when browsing the website and helps the LTPA to make improvements.

The LTPA website is SSL certified and uses HTTPS. SSL (Secure Sockets Layer) is the standard security technology for establishing an encrypted link between a web server and a browser. This link ensures that all data passed between the web server and browsers remain private and integral.

The LTPA website may, from time to time, contain links to and from the websites of others. If members follow a link to any of these websites, which may have their own member privacy policies, the LTPA do not accept any responsibility or liability for these policies. Members are expected to check these policies before they submit personal data to these websites.

### **Passwords**

Members require a password to gain access to parts of the Association website. This may be provided initially by the LTPA or by the member. It is a requirement of use that these passwords are kept confidential and are never shared with others.

### **Contact details**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Secretary [here](#).