

## Privacy Notice

Virgin Money Retirement Savings Plan Trustee Ltd (“the Trustee”) is the trustee of the Virgin Money Retirement Savings Plan (“the VM Plan”).

We gather, hold and use personal information (also known as personal data) relating to members and former members of the VM Plan, their family and dependants. We need that information for the purposes of administering the VM Plan, paying benefits, internal statistical modelling and reference purposes. Without such information, it may be impossible for some benefits under the VM Plan to be paid.

We are committed to protecting and processing fairly and lawfully the personal information we gather, hold and use. This Privacy Notice explains how we do this.

This Privacy Notice is the latest version as at 13 March 2025. This Privacy Notice may be updated from time to time and you can see the current version at any time on [Virgin Money | My Retirement | Virgin Money Retirement Savings Plan](#).

Where you have provided us with personal data about other individuals, such as family members or your other dependants, please ensure that they are aware of the information contained within this notice.

### 1 About us

1.1 As noted above we are the Trustee of the VM Plan.

1.2 For the purposes of data protection laws, we are the 'controller' of the personal information we gather, hold and use about you, your family and other dependants as we decide the purposes for and how the personal information we gather and use is processed.

### 2 Your privacy rights

You have a number of legal rights in relation to the personal information we hold about you, including:

**Access to your personal information** - you can request access to a copy of the personal information that we hold about you. You can make a request by contacting the Secretary to the Trustee whose details are set out at section 11 below. Please make all requests in writing. You may be asked for evidence of your identity. Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances. We can in some particular circumstances refuse to act on requests.

**Right to withdraw consent** - if you have given us your consent to use personal information, you can withdraw your consent at any time. However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for us to continue processing your personal data where this is justified.

**Rectification** - you can ask us to change or complete any inaccurate or incomplete personal information held about you.

**Erasure** - you can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. However, we can override this in certain circumstances.

**Restriction** - you can ask us to restrict the personal information we use about you in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.

**Right to object to processing** - where 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.

**Make a complaint** - if you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**. The details for the ICO's website are **ico.org.uk**.

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

### 3 The kinds of personal information we gather and use

- 3.1 We use different types of personal information depending on a person's circumstances at the time. This may include some or all the following information about you, your family and other dependants:

name and date of birth, gender, status – whether single, married, in a civil partnership or other relationship akin to marriage or civil partnership, postal address, telephone number and email address, Cookie id, IP address, national insurance number, employee and/or scheme number, tax details, details of bank account for the purpose of paying benefits, details about your dependants and/or beneficiaries (including their names and possibly details of their gender), relevant employment information (including current and past salary information and employment dates) and details about investment choices and chosen contribution level. If you were to request to access your benefits before the minimum pension age on the grounds of ill-health, we would also request medical and other details about your health. If you use a pensions dashboard, an online platform where you can access information about all of your pension benefits, we will also receive a "pensions identifier", which is a string of characters used to identify your specific benefits under the VM Plan.

- 3.2 As part of running the VM Plan, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special categories of personal data"). See section 6.2 below for further details.

### 4 How we gather your personal information

- 4.1 We gather personal information from a number of sources including the following:

- directly from the individual concerned,
- from the current or former employer of a member or former member
- from persons acting as personal representatives of a deceased person's estate
- from a public body such as HMRC
- from public databases such as the Register of Births, Deaths and Marriages
- from schemes where transfers into the VM Plan have been made
- from an independent financial adviser, solicitor or other person instructed by a person to provide us with information
- our advisers or others set out in the list at section 7 below.

## 5 How we use your personal information

- 5.1 Personal information must only be used for the purpose or purposes for which it is collected. Put simply, the main purpose for which we gather, hold and use personal data is so that we can properly administer the VM Plan, by ensuring that benefits are calculated correctly and paid to or in respect of the right person. In addition, as noted above we use personal data for internal statistical, financial modelling and reference purposes.
- 5.2 We may, subject to compliance with the data protection laws, process personal information for another purpose if that purpose is compatible with the purposes referred to in section 5.1 above.

## 6 Our legal basis for using your personal information

- 6.1 We use personal information:
- to comply with our legal obligations under the documents governing the VM Plan and legislation governing the operation of pension schemes;
  - to the extent required to comply with our duties in relation to individuals using pensions dashboards; and
  - where we have a legitimate interest in holding and processing personal information about you as it is needed for us to properly administer the VM Plan and to calculate and pay benefits.

Although you can object to processing on this ground, this objection can be overridden where there are compelling reasons (e.g. because we need to process personal information to meet our legal obligation to pay benefits).

- 6.2 Where special categories of personal information are processed, such as information about an individual's health or sexual orientation or information about a criminal conviction if this has resulted in an individual owing money to an employer or former employer and that employer may be reimbursed from the person's benefits, further legal grounds apply in order for us to process the data, including:

- 6.2.1 where you have given your explicit consent
- 6.2.2 by relying on provisions set out in data protection laws permitting the processing of special categories of personal data, such as where such processing is in connection with employment, social security and social protection
- 6.2.3 where you have made the special category of personal information manifestly public, or
- 6.2.4 where the information is required to establish, exercise or defend legal claims.

Where we have your consent to process special categories of personal information, you have the right to withdraw it as noted in section 2 above. We will let you know how to do that at the time we gather your consent.

## 7 Sharing your personal information with others

### 7.1 We share personal data we hold with the following

- personnel in Virgin Money's Group Pensions Department for many reasons such as checking the benefits, eligibility for certain benefits, dealing with day to day queries
- Virgin Money and the Virgin Money UK Plc Group (and potential purchasers of any part of the Group's business) for any purpose for which the Group has a legitimate interest in processing VM Plan personal data. You can view the current version of Virgin Money's privacy notice online, available at: <https://uk.virginmoney.com/security>.
- the VM Plan's professional advisers, including the auditor, medical advisers, investment advisers, benefit consultants and lawyers
- the administrators, who are responsible for the day-to-day administration of the VM Plan and the pensions administration system provider
- the advisers and printers who help prepare various communications which are sent to members, and others
- your past or future employer (in the case of transferring benefits)
- appointed providers of life insurance and additional voluntary contributions, tracing bureaus for mortality screening and locating members and other beneficiaries
- depending upon how pensions are paid, organisations to whom personal data is sent to effect pension or other benefit payments whether in the UK or overseas
- in the context of pension transfers, other schemes, their providers and administrators and financial advisers appointed by members
- Government and regulatory bodies (we can be fined and subject to other action if we fail to provide certain information to certain authorities)

- UK courts for the purposes of processing pension sharing orders
- if we pay you a cash lump sum through the Payroll system, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK
- third parties that form part of the “pensions dashboard ecosystem” that enables pensions dashboards services to work, as well as the VM Plan’s Integrated Service Provider (ISP), which provides a service allowing pensions information from the VM Plan to be connected to the dashboard ecosystem

7.2 In addition, where we make investments, seek to provide or secure benefits for members in other ways (such as through the use of insurance or a master trust), or to offer members access to additional retirement options through arrangements outside of the VM Plan, we may need to share personal data with providers of such investments, insurers and other pension scheme operators.

7.3 Some of those organisations referred to in sections 7.1 and 7.2 above will simply process your personal data on our behalf and in accordance with our instructions. Other organisations will be responsible to you directly for their use of personal data that we share with them. When we share personal data with Virgin Money or the Virgin Money UK Plc Group, Virgin Money or the Virgin Money UK Plc Group will be responsible to you directly for their use of personal data that we share with them. You can view the current version of Virgin Money’s privacy notice online, available at <https://uk.virginmoney.com/security>.

## 8 Transfers of personal data

8.1 Any transfer of your personal data must be done securely and consideration is always given to the most secure and efficient way of doing this such as the anonymisation of VM Plan personal data.

## 9 International transfers

9.1 We or the entities outlined in section 7 above may need to transfer data to other countries outside of the United Kingdom from time to time. Unless the country to which the data is to be transferred ensures an adequate level of protection for personal information (as assessed by the UK authorities), we (or the relevant entity) will put in place safeguards in line with the recommendations of data protection legislation. In particular, such transfers will generally be made based on the UK international data transfer agreement or, where relevant, the EU Commission’s standard contractual clauses.

9.2 Parties with whom we share data must inform us of any processing of personal information outside of the EEA.

## 10 How long we keep your personal information for

10.1 We must keep all personal data safe and only hold it for as long as necessary. We will keep relevant personal information for as long as is required to meet the purposes for which it was collected. We also address legal requirements relating to retention. For example, to meet the requirements of both UK tax and pensions law, we must keep certain personal

data (for example, details about the date a member joins the VM Plan, their name and address) for a minimum of 6 years. Where there is a maximum limit on how long we can keep certain personal data for, we will comply with that restriction. Given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life, or the life of the last remaining beneficiary associated with the member, plus 7 years.

10.2 We review the types of personal information we hold in relation to the VM Plan annually. If the decision is taken that certain personal information is no longer needed, the personal information will generally be destroyed, erased or made inaccessible.

## 11 Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the Privacy Notice and/or
- make a complaint about how we have handled your personal data

please contact the Secretary to the Trustee, care of the Pensions team at [pensionsteam@virginmoney.com](mailto:pensionsteam@virginmoney.com) or write to Pensions Team, HR, Jubilee House, Gosforth, Newcastle Upon Tyne NE3 4PL.