FULL PRIVACY NOTICE

FOR THE MEMBERS [AND BENEFICIARIES] OF THE SHROPSHIRE COUNTY PENSION FUND[1]

This privacy notice is for members and beneficiaries (referred to as “**you**”) of the Shropshire County Pension Fund [2] (the **"Fund"**). It has been prepared by Shropshire County Council[3] (the **"Administering Authority"**, or **"we"**) in its capacity as the administering authority of the Fund. This privacy notice describes how we collect and use personal data in accordance with data protection legislation.[4]

This privacy notice will also be made available on online on the Fund's website at the following link: [Data protection privacy notice | Shropshire County Pension Fund]

It is important that you read this privacy notice together with any other privacy notice or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice replaces any general privacy notice we may have previously issued and supplements any other notices and privacy policies we issue that are specific to particular data collection / processing activities.

[1] Shropshire County Pension Fund. Please note that this notice will not be suitable for issue to vulnerable individuals, including children. Administering Authorities may wish to take legal advice on what would be suitable to be supplied to vulnerable individuals, including children, and the changes that should be made order to ensure that the content can be understood. The European Data Protection Board (previously known as the Article 29 Data Protection Working Party) guidelines state that where information previously provided to data subjects (for example, in privacy notices) is being updated to comply with the UK GDPR, it should be made clear to the data subjects that changes have been made in order to comply with the UK GDPR – Administering Authorities may wish to consider the extent to which wording is included in the privacy notice in this regard.

[2] Shropshire County Pension Fund.

[3] Shropshire County Council.

[4] Please note that the relevant data protection legislation includes:

- the UK Data Protection Act 2018;
- the UK GDPR (as defined in the section 3(10) Data Protection Act 2018;
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003) (as amended and incorporated into the laws of England & Wales, Scotland and Northern Ireland);
- the General Data Protection Regulation 2016/679;
- the Data (Use and Access) Act 2025; and
- all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of personal data (including, without limitation, the privacy of electronic communications).

Why we are providing this notice to you

As the Administering Authority of the Fund we hold certain information about you and from which you can be identified (**"personal data"**) which we use to administer the Fund and to pay benefits from it. In line with data protection legislation, we are required to give you specified information about the personal data we hold about you, how we use it, your rights in relation to it and the safeguards that are in place to protect it. This notice is designed to give you that information.

The technical bit

The Administering Authority holds personal data about you, in its capacity as a controller, for the proper handling of all matters relating to the Fund, including its administration and management. This includes the need to process your data to contact you, to calculate, secure and pay your benefits, for statistical and financial modelling[5] and for reference purposes (for example, when we assess how much money is needed to provide members' and beneficiaries' benefits and how that money should be invested), and to manage liabilities and administer the Fund generally. Further information about how we use your personal data is provided below.

The lawful basis[6] for our use of your personal data will usually be that we need to process your personal data to satisfy our legal obligations as the Administering Authority of the Fund, including, for example, our obligations under the pensions dashboard regulations. Where that legal basis does not apply then the legal basis for our use of your personal data will be one or more of the following:[7]

- we need to process your personal data to carry out a task in the public interest or in the exercise of official authority in our capacity as a public body; [and/or]
- [we need to process your personal data for the legitimate interests[8] of administering and managing the Fund and liabilities under it, calculating, securing and paying benefits and performing our obligations and exercising any rights, duties and discretions the Administering Authority has in relation to the Fund][./; [and/or]

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[5] The European Data Protection Board (previously Article 29 Data Protection Working Party guidelines) suggest that more detail of any statistical and financial modelling should be provided where known.

[6] This is intended to address the requirements of Articles 13(1)(c) and 14(1)(c) of the UK GDPR. However, please note this should be supplemented or replaced with more detail. Specifically, we recommend that Administering Authorities use their records of processing (as required under Article 30 UK GDPR), to include in this notice, a detailed table that identifies each of the processing activities carried out by the Administering Authority in relation to the Fund, linked to the categories of personal data used in respect of each activity and the applicable lawful basis. It is becoming increasingly common to include that more detailed explanation.

[7] We have assumed that the Administering Authority or its advisers/service providers are not carrying out any automated decision making (including profiling). Administering Authorities should check the position because any automated decision making that is being carried out will need to be flagged in the privacy notice (see Article 13(2)(f) and Article 14(2)(g) of the UK GDPR). The Administering Authority should also be made aware that if they carry out automated decision making in the future then that further information will need to be provided to the individuals concerned. The Administering Authority should take legal advice before undertaking any automated decision making (including profiling).

[8] The UK GDPR does not permit public authorities to rely on legitimate interests for any processing they undertake in their capacity as a public authority. However, where the public authority has other legitimate purposes outside of their tasks as a public authority e.g. a contract between the Administering Authority and individual where AVCs are being made, it may be possible to rely on legitimate interest as a legal basis for collecting and processing that personal data. The Data (Use and Access) Act 2025 introduces a new lawful basis of 'recognised legitimate interests' in Article 6(1)(ea), with a narrow list of pre-approved purposes that are in the public interest. Annex 1 of the UK GDPR lists the pre-approved purposes. In practice, the circumstances in which an Administering Authority is likely to rely on any of the existing 'recognised legitimate interests' are likely to be very limited, though note that the list of 'recognised legitimate interests' may be extended in future. Legal advice should be taken.

- [because we need to process your personal data to meet our contractual obligations to you in relation to the Fund (for example, under an agreement that you will pay additional voluntary contributions to the Fund), or to take steps, at your request, before entering into a contract].

Please note that where we indicate that our processing of your personal data is necessary for us to comply with a legal obligation, or for us to take steps, at your request, to potentially enter into an employment contract with you, or to perform it, and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract with you.

What personal data we hold, and how we obtain it[9]

- The types of personal data we hold and process about you can include:
- Contact details, including name (and previous or alternate names), address, telephone numbers and email address.
- Identifying details, including gender, sex, date of birth, national insurance number ("NINO") and/or partial or "dummy" NINO and employee and membership numbers and, if you have used a pensions dashboard to access information about your pension, a "pension identifier" (PEI), which is used to confirm a match and identify your specific benefits under the Fund for the purposes of displaying information via a dashboard.
- Information that is used to calculate and assess eligibility for benefits, for example, length of service or membership and salary information.
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax details.
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death.
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or where your health is relevant to a claim for benefits following the death of a member of the Fund.[10]
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Fund and the employer or the Fund may be reimbursed from your benefits.[11]

[9] Please consider whether any personal data other than that listed is held or processed. Please note that Article 9 of the UK GDPR applies different treatment to the processing of special categories of personal data. In addition, the Administering Authority should conduct a separate review of the correspondence and documentation provided to members and beneficiaries at the point in time that the personal data is requested, such as new joiner forms, transfer applications, expression of wish forms and applications for early retirement etc. In particular: (a) the documentation will need to flag why there is a requirement to provide the information, whether the individual is obliged to do so and the possible consequences of failing to provide that data (see Article 13 of the UK GDPR) - this isn't explicitly covered in the template privacy notice which is drafted on the basis that the Administering Authority already holds personal data about the data subject; and (b) the Administering Authority will also need to consider how the privacy notice is incorporated into the data collection process.

[10] Explicit consent may be required in the processing of health data and ill health early retirement applications. This privacy notice does not seek such consent, which should be obtained at the time of any application. It should not generally be necessary to renew consents obtained under the Data Protection Act 1998 in respect of past ill health early retirement applications provided that the requirements of the UK GDPR/ new UK data protection legislation were complied with. However, legal advice should be taken. As a pragmatic approach, Administering Authorities should consider renewing consent when communicating with individuals about special category data collected prior to 25 May 2018. An appropriate policy document may also be required where special category information is processed.

[11] Explicit consent may also be needed to process information about criminal convictions/offences. An appropriate policy document will also be required in almost all cases where information about criminal convictions is processed. Extra information will have to be provided to the individual as and when the consent is obtained or the Administering Authority receives personal data concerning criminal convictions/offences. The Administering Authority may wish to review and update any current communications and documentation and/or take legal advice in relation to the same. See note 10 above.

- Information about any previous membership of other public service pension schemes and other LGPS administering authorities, including your date of leaving and whether the previous scheme /authority has assessed your eligibility for underpin protection (see "How we will use your information" below).
- Electronic "pension identifiers" for pensions dashboards (explained below).
- "Value data" for pensions dashboards, which includes details of how much pension you have built up and how much you may have when you retire, and other view data relating to you for pension dashboards

We obtain some of this personal data directly from you.[12] We may also obtain data (for example, salary information) from your current or past employer(s) or companies that succeeded them in business, from a member of the Fund (where you are or could be a beneficiary of the Fund as a consequence of that person's membership of the Fund) and from a variety of other sources including public databases (such as the Register of Births, Deaths and Marriages), a pensions dashboard (when you use it to access your pensions information), our advisers and government or regulatory bodies, including those in the list of organisations that we may share your personal data with set out below.[13] Some of your personal data may also be collected indirectly through the pensions dashboards ecosystem (including the identity service, the pension finder service and the consent and authorisation service).

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Administering Authority in writing[14]. However, if you do not give consent, or subsequently withdraw it, the Administering Authority may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

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

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[12] Please note that where members or beneficiaries are asked to provide health related data, explicit consent to the processing of that data should be obtained at the time it is requested. See note 10 above.

[13] Please note Article 14 of the UK GDPR sets out specific information obligations on the Administering Authority where it obtains information from a third party unless one of the exceptions under Article 14(5) apply. The European Data Protection Board (previously Article 29 Working Party) guidelines state that where possible specific sources of personal data should be listed – consider if any more need to be added (particularly any that a member/beneficiary might not generally be aware of). It has become clearer since 2018 that one of the key focuses from a regulatory perspective is on transparency and that includes on sources of data and on who it is shared with. Funds should identify specific sources of types of data where it is not obtaining it from a member or beneficiary of the Fund. Funds should consider including further information (for example, a detailed table either in this section or at end of this privacy notice.

[14] If pre- UK GDPR consents did not inform individuals of this right (which is likely, given that it is a new explicit right under the UK GDPR) then it may not be possible to rely on them. Retrospectively informing members/beneficiaries may not be adequate therefore legal advice should be taken. See note 10 above.

How we will use your personal data[15]

We will use this data to deal with all matters relating to the Fund, including its administration and management[16]. This can include the processing of your personal data for all or any of the following purposes:

- To contact you.
- To assess eligibility for, calculate and provide you (and, if you are a member of the Fund, your beneficiaries upon your death) with benefits.
- To identify your potential or actual benefit options and, where relevant, implement those options.
- To allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements.
- To facilitate your access to your pensions information via a pensions dashboard.
- For statistical and financial modelling and reference purposes (for example, when we assess how much money is needed to provide members' and beneficiaries' benefits and how that money should be invested).
- To assess and, if appropriate, action a request you make to transfer your benefits out of the Fund.[17]
- To comply with our legal and regulatory obligations as the administering authority of the Fund.
- To address queries from members and other beneficiaries and to respond to any actual or potential disputes concerning the Fund.
- The management of the Fund's liabilities, including the entering into of insurance arrangements and selection of Fund investments.
- In connection with the sale, merger or corporate reorganisation of or transfer of a business by the employers that participate in the Fund and their group companies.[18]
- To identify whether you qualify for underpin protection. For more information, please see [McCloud | Shropshire County Pension Fund]

Pensions Dashboards

The pensions dashboard framework requires us to share personal data within the dashboards ecosystem. When a member searches for information about their pensions online via a pensions dashboard, we receive certain personal data for the purposes of identifying a match with the member's pension in the Fund. We then need to provide certain pensions information to the dashboards ecosystem so that it can be displayed via the relevant dashboard. These activities are carried out in accordance with our legal obligations under pensions dashboards legislation, which requires us to match certain members with their pension benefits and to provide information to the dashboards ecosystem. 5 Version 7: valid from June 2026 This includes processing personal data

[15] This is intended to satisfy requirements of Articles 13(1)(c) and 14(1)(c) of the UK GDPR.

[16] Reference to the external pension provider in respect of AVCs should be added if applicable.

[17] This is intended to cover situations where additional information is required by Administering Authorities to rule out pension scam activity and process a transfer request. However, additional information will need to be provided to the data subject at the time the information is collected to fully comply with the UK GDPR. See note 9 above for further details.

[18] Please insert and identify any other purposes for which the personal data may be used in individual circumstances.

to match members to their pension benefits and to provide information to the dashboards ecosystem.

It may also include processing personal data as part of testing, development and compliance activities required to prepare for and maintain our connection to the pensions dashboards ecosystem.

As part of these legal obligations, the personal data processed may include identifying information used to match you to your pension benefits, as well as information relating to your pension entitlements.

These activities may involve sharing your personal data with entities within the dashboards ecosystem, including (but not limited to) the identity verification service, the pension finder service and the consent and authorisation service, as well as with operators of both commercial and non-commercial dashboards, including those in the list of organisations that we may share your personal data with set out below.

We may also share your personal data with, and receive data from, third-party service providers or integrated service providers we appoint to support us in connecting to dashboards and complying with our legal duties.

In addition, we may be required to disclose information (which may include personal data) to relevant bodies in connection with our dashboards obligations, including the Money and Pensions Service, the Pensions Regulator and, where applicable, the Financial Conduct Authority.

Where we obtain personal data from the dashboards ecosystem, or during the process of matching members with their pension benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that you are entitled to receive information about your benefits via a dashboard and to assist us in administering the Fund.

Organisations that we may share your personal data with

From time to time, we will share your personal data with advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Fund. Some of those organisations will simply process your personal data on our behalf and in accordance with our instructions; they are referred to as processors. Other organisations will be responsible to you directly for their use of personal data that we share with them; they are referred to as controllers. The controllers may be obliged under the data protection legislation to provide you with additional information regarding the personal data they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example via their websites[19].

Whenever one of our advisers or service providers acts as a joint controller with us in respect of your personal data, because we jointly determine the purposes and means of processing it, we will agree with them how we are each going to meet our respective and collective obligations under the data protection legislation. If you would like more information about how such an arrangement works please contact us using the contact details below.[20]

The organisations that we may share your personal data with may include the following advisers and service providers:[21]

[19] This is suggested as a pragmatic approach in order to keep the Fund's privacy notice as succinct and easy to understand as possible, rather than adding any specific information another controller may ask the Administering Authority to include on its behalf. However, Administering Authorities should consult with their own providers (e.g. the Fund actuary). Controllers will have their own, separate obligations under data protection legislation to provide a privacy notice to any individuals whose personal data they receive when providing services to the Administering Authority. In practice, it is likely the Administering Authority will be asked to assist with that process, either by sending the adviser's privacy notice to members/beneficiaries or by including a link in the Administering Authority's own privacy notice to the adviser's website, where a copy of the adviser's privacy notice can be accessed. This link could be included within the table of current advisers set out above.

[20] We have assumed that none of the service providers are claiming to be joint controllers (but please seek legal advice if this assumption is incorrect). Notwithstanding the assumption that none of the service providers are claiming to be joint controllers, we have included this wording in the privacy notice in case in the future we have further clarity regarding the definition of "joint controller" (including actuaries' status as joint controllers, which is particularly controversial). We have deliberately kept this brief and not named specific service providers as potential joint controllers. Guidance has been issued on the distinction between controllers and processors which includes some guidance on joint controllership. However, it's still not particularly clear. The wording as drafted will not be compliant with a strict reading of Article 26 of the GDPR if there are any joint controller relationships. Article 26 requires joint controllers to have an "arrangement" between them setting out their respective responsibilities and that the "essence of the arrangement shall be made available to the data subject". Administering Authorities will therefore need to assess this on a case by case basis and then include any details of any joint controllership in this privacy notice in order to comply.

[21] Administering Authorities should carry out assessments as to controller, processor and joint controller and then complete this table as appropriate. As an alternative, this could be included in a separate table at end of this privacy notice. We have included some examples as illustrations of some bodies and of possible categorisation but note that Administering Authorities will need to assess on a case by case basis. However, this will depend on precise facts of appointment of each adviser and services provider, including the approach taken by individual entity.

Processors	**Controllers**[24]
• Administrator – currently Shropshire County Council • Additional Voluntary Contribution providers – currently Prudential Assurance Company Ltd • Tracing bureaus for mortality screening and locating members and beneficiaries[22] – currently Tracing Group Ltd • Overseas payments provider to transmit payments to Fund members and beneficiaries with non-UK accounts – currently Equiniti Limited • Integrated service provider(s), facilitating connections to a pensions dashboard – currently Heywood Limited[23] • Printing companies – currently BluPrint (Shropshire Council) • Pensions software provider – currently Heywood Pension Technologies Suppliers of IT, document production and distribution services	• Actuarial consultant – currently Mercer Limited • Investment adviser – (currently AON and Philip Hebson) • Additional Voluntary Contribution providers – currently Prudential Assurance Company Ltd[25] • Legal adviser –Eversheds Sutherland • Fund Actuary – currently – Mercer Investment Consulting • Statutory auditor – currently Grant Thornton UK LLP • External auditor – currently Grant Thornton UK LLP • Internal auditor – Shropshire Council Audit Services • LGPS National Insurance database – (South Yorkshire Pensions Authority) • Administering authorities of other LGPS funds (or their agents, such as third party administrators) where you have been a member of another LGPS fund and the information is needed to determine the benefits to which you or your dependants are entitled • Administrators of other public service pension schemes where you have been a member of another public service pension scheme and the information is needed to determine if you qualify for underpin protection • The Department for Work and Pensions • The Government Actuary's Department • The Cabinet Office – for the purposes of the National Fraud Initiative • HMRC • The Courts of England and Wales – for the purpose of processing pension sharing orders on divorce • Money & Pensions Service

[22] The tracing bureaus may consider themselves to be data controllers – the Administering Authority may wish to check this with the tracing bureau directly.

[23] This would be the ISP appointed by the Administering Authority and also – if applicable – the ISP appointed by the AVC provider.

[24] See note 21.

[25] AVC providers are included in both the controller and processor sections of this table because they may be a controller in respect of certain activities and a processor in respect of others (e.g. some AVC providers position themselves as processors in respect of pensions dashboard services). The Administering Authority may wish to check this with the AVC provider directly.

Where we make Fund investments or seek to provide benefits for members and beneficiaries in other ways, such as through the use of insurance, then we may also need to share personal data with providers of investments, insurers and other pension scheme operators.[26]

From time to time, we may provide some of your data to your employer and their relevant subsidiaries (and potential purchasers of their businesses) and advisers for the purposes of enabling those entities to understand the liabilities and obligations of the employer regarding the Fund. Your employer would generally be a controller of the personal data shared with it in those circumstances. For example, where your employment is engaged in providing services subject to an outsourcing arrangement, the Administering Authority may provide information about your pension benefits to your employer and to potential bidders for that contract when it ends or is renewed.

The pensions dashboard framework requires us to share personal data within the dashboards ecosystem. When a member searches for information about their pensions online via a pensions dashboard, we receive certain personal data for the purposes of identifying a match with the member's pension in the Fund. We then need to provide certain pensions information to the dashboards ecosystem so that it can be displayed via the relevant dashboard.

Where requested or if we consider that it is reasonably required, we may also provide your data to government bodies and dispute resolution and law enforcement organisations, including those listed above[27], the Pensions Regulator, the Pensions Ombudsman and Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their functions.

The organisations referred to in the paragraphs above may use the personal data to perform their functions in relation to the Fund as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

[We do not use your personal data for marketing purposes and will not share this data with anyone for the purpose of marketing to you or any beneficiary.][28]

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[26] The paragraph may be required where, for example, the Administering Authority secures benefits via insurance or a transfer to another pension arrangement.

[27] Please confirm names of other organisations, including government agencies, with whom personal data may be shared.

[28] The use of personal data for direct marketing purposes is addressed at Article 21 of the UK GDPR and automated processing and profiling at Article 22. We assume there will be no automated processing which has a legal effect or significant impact on the data subject's rights subject but Administering Authorities should assess whether that is in fact the case and include appropriate wording where necessary to satisfy Articles 13(2)(f) and 14(2)(g) of the UK GDPR. We have assumed that Administering Authorities and their advisers/service providers are not using personal data for direct marketing purposes. However, if direct marketing is taking place then the members/beneficiaries should be informed about their right to object to this. Administering Authorities may wish to seek legal advice.

Transferring information outside the UK

In some cases recipients of your personal data may be outside the UK. As such, your personal data may be transferred outside the UK to a jurisdiction that may not offer an adequate level of protection as is required by the UK Government.

If this occurs, additional safeguards must be implemented with a view to protecting your personal data in accordance with applicable laws. Please use the contact details below if you want more information about the safeguards that are currently in place.[29]

How long we keep your personal data[30]

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected and for so long afterwards as we consider may be required to deal with any questions or complaints that we may receive about our administration of the Fund, unless we elect to retain your data for a longer period to comply with our legal and regulatory obligations. In practice, this means that your personal data will be retained for the greater of:

- such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Fund and for a period of 15 years [31] after those benefits stop being paid. For the same reason, your personal data may also need to be retained where you have received a transfer, or refund, from the Fund in respect of your benefit entitlement;[or]
- 100 years from a member's date of birth [32]; [or]

[29] This generic wording does not fully meet the requirements of the UK GDPR and the standards of the ICO but is intended to address the requirements of Articles 13(1)(f) and 14(1)(f) of the UK GDPR. The European Data Protection Board (previously known as the Article 29 Working Party) guidelines state that known third countries should be specified, along with the UK GDPR-compliant mechanism that is being used to protect the personal data, but this may not be practical. If Administering Authorities have further details about the international transfers of personal data and the safeguards in place to protect that data, then this paragraph should be amended. Administering Authorities should consider their own circumstances, ensure that they can answer any requests for further information and take legal advice where appropriate.

[30] This is intended to satisfy the requirements of Articles 13(2)(a) and 14(2)(a) of the UK GDPR. The European Data Protection Board (previously known as Article 29 Working Party) guidelines on retention periods state that meaningful information about the likely period of retention should be provided and a generic statement is not appropriate ("It is not sufficient for the controller to generically state that personal data will be kept as long as necessary for the legitimate purposes of the processing"). While data protection legislation does not prescribe a time period beyond which data must not be kept, the controller is under an obligation to inform individuals of the period for which data will be kept or, if this is not possible, the criteria that will be used to determine the retention period. The UK GDPR states that while the data is being retained, the controller is also under an obligation to keep personal data up to date and to take every reasonable step to ensure that inaccurate data is either erased or rectified without delay. Further, that data must not be kept in a form that is capable of identifying an individual for longer than is necessary. In practice, we anticipate that Administering Authorities will need to retain personal data held for the purposes of the Fund for extended periods because of the long-term nature of the pension liabilities. Consideration should, however, be given to "filleting" the data held so that individual items are not retained for longer than actually required. The suggested period of "last payment of benefits plus 15 years" was based on the current maximum statutory limitation period, as any complaints about the payment of those benefits would need to be brought within that timeframe. It does, however, suggest that at some point data would actually be deleted. If in practice the Administering Authority does not currently operate such a practice and does not propose to do so going forwards as a response to the new data protection legislation, then the wording will need to be amended. However, Administering Authorities should be aware that if they do not attempt to give a defined period for which personal data will be held, strictly speaking this is unlikely to comply with the UK GDPR. Administering Authorities will need to consider the extent to which the suggested wording matches their actual practice.

See Articles 5(1) and 5(2), and in particular Article 5(1)(c) - (e) of the UK GDPR. Please also see Recital 39 of the UK GDPR.

[31] The suggested period of "last payment of benefits plus 15 years" is based on the current maximum statutory limitation period, as any complaints about the payment of those benefits would usually need to be brought within that timeframe.

[32] The suggested period of "100 years from date of birth" is based on the guidelines by the National Archives and the ICO's retention policy.

- 100 years from the date of birth of any beneficiary who received benefits from the Fund after the member's death.

Where you seek to access your pensions information via a pensions dashboard, the pensions dashboard regulations require us to retain different types of information (some of which includes personal data) for specific periods (some of which includes personal data) as required by the pensions dashboard regulations and relevant regulatory guidance.[33]

Your rights[34]

You have a right to access and obtain a copy of the personal data that the Administering Authority holds about you and to ask the Administering Authority to correct or complete your personal data if there are any errors or it is out of date or incomplete. In very limited circumstances, you may also have a right to ask the Administering Authority to restrict[35] the processing of your personal data, or to transfer or (in extremely limited circumstances, such as where your personal data is no longer needed for the purpose for which it is being processed) erase[36] your personal data. You should note that we are not obliged to erase your personal data if we need to process it for the purposes of administering the Fund.

In certain circumstances you have the right to object to the processing of your personal data; for example, you have the right to object to processing of your personal data which is based on the public interest or legitimate interests identified in the section above headed "*The technical bit*", or where processing is for direct marketing purposes.

You also have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning you or similarly significantly affects you.

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[33] The Pensions Dashboard Regulations 2022 specify the maximum retention periods for specific types of personal data.

[34] This is intended to satisfy the requirements of Articles 13(2)(b) and 14(2)(c) of the UK GDPR. As mentioned above, the privacy notice will need to be amended and simplified if it is to be sent to children (and potentially other vulnerable individuals) in order to ensure they can understand the content.

[35] See Article 18 of the UK GDPR. The Administering Authority should restrict the processing of the personal data (subject to certain exceptions e.g. storage or to defend a legal claim or for reasons of important public interest) in a number of circumstances specified in Article 18. These include where the individual has contested the accuracy of the personal data. The processing would also have to be restricted where the individual has raised an objection, and the Administering Authority's justification for the processing is based on Article 6(1)(e) or (f) i.e. the necessity to: perform a task in the public interest or pursuant to an official authority; or (if applicable) in its legitimate interests. In practice we anticipate Administering Authorities are likely to have another justification for processing data (i.e. to satisfy their legal obligations under the LGPS regulations) and so members will not be able to restrict processing of accurate data. However, any applicable restriction will last until the Administering Authority is able to verify the accuracy of the personal data or demonstrate an overriding justification for its processing respectively. For reference, note: Article 21(1) contains the right of the data subject to object to the processing of personal data in circumstances relating to the individual, where the controller is relying on the justifications in Article 6(1)(e) or (f), which includes those mentioned immediately above. Under Article 21(2), the right to object also includes where personal data is used for direct marketing purposes and profiling for that purpose.

[36] See Articles 17(1) and 17(2) of the UK GDPR. This information has to be included notwithstanding that in relation to the LGPS it is not anticipated that members/beneficiaries will in practice have a right of erasure (due to the legal basis for which personal data is collected and processed).

Under data protection laws, where a decision is taken based solely on automated processing, appropriate safeguards must be in place to protect your rights, freedoms and legitimate interests. These include measures which:

a) provide you with information about the decision in relation to you;

b) give you the opportunity to make representations;

c) enable you to obtain human intervention; and

d) allow you to contest the decision.

The Administering Authority does not currently take any decisions based solely on automated processing which would produce legal or similarly significant effects on you. If that changes, we will update this privacy notice.

You also have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning you or similarly significantly affects you.

Under data protection laws, where a decision is taken based solely on automated processing, appropriate safeguards must be in place to protect your rights, freedoms and legitimate interests. These include measures which:

- provide you with information about the decision in relation to you;
- give you the opportunity to make representations;
- enable you to obtain human intervention; and
- allow you to contest the decision.

[The Administering Authority does not currently take any decisions based solely on automated processing which would produce legal or similarly significant effects on you. If that changes, we will update this privacy notice.]

Complaints

You also have the right to make a complaint to us if you have any concerns over how we collect, use or otherwise process your personal data.

We are required to have procedures in place to support individuals who wish to raise a complaint about the handling of their personal data.

We will acknowledge your complaint within 30 days and will respond without undue delay.

If you would like to make a complaint to us, please follow our Data Protection Complaints Procedure set out in the same document as our Internal Dispute Resolution Procedure (Appeals (IDRP)).

You can obtain further information about your rights from the Information Commissioner's Office at www.ico.org.uk or via its telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or if you have any queries, complaints[37] or concerns regarding the processing of your personal data, please contact the Fund Administrator or our Data Protection Officer as indicated below.[38] . You can submit a data protection complaint to us by contacting the Data Protection Officer at Shropshire County Council.

Post: Information Governance Team Legal and Governance Resources Directorate
Shropshire Council Guildhall,
Frankwell Quay,
Shrewsbury
SY3 8HQ

Phone: 01743 252179

Email: information.request@shropshire.gov.uk

You also have the right to lodge a complaint in relation to this privacy notice or the Administering Authority's processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.[39]

As explained in the section above headed "*How we will use your personal data*", one of the reasons we collect and hold your personal data is to administer your Fund benefits.[40] If you do not provide the information we request, or ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits, including the payment of benefits from the Fund. In some cases it could mean the Administering Authority is unable to put your pension into payment or has to stop your pension (if already in payment).[41]

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[37] The Data (Use and Access) Act 2025 introduces a new requirement in section 164A of the Data Protection Act 2018 for controllers to (a) facilitate the making of data protection complaints (for example, by providing a complaint form), (b) acknowledge receipt of complaints within 30 days of receiving them; (c) without undue delay, take appropriate steps to respond to complaints, including making appropriate enquiries, and keep the complainants informed; and (d) without undue delay, tell the complainants the outcome of their complaints. These specific changes are expected to come into effect in June 2026. The Secretary of State may by further regulations require controllers to notify the ICO of the number of complaints received by it under section 164A, though those further regulations (which will include further detail on, for example, the form of that notification and how the number of complaints is to be calculated) have not yet been published.

[38] The controller is also under an obligation to inform other data recipients that personal data has been rectified, restricted or erased, and inform the individual of such data recipients on request. See Article 19 of the UK GDPR.

[39] This is intended to satisfy the requirements of Articles 13(2)(d) and 14(2)(e) of the UK GDPR.

[40] In order to satisfy Article 13(2)(e) of the UK GDPR, correspondence/documentation asking for personal data should contain specific information about why such information needs to be provided and whether the individual is obliged to provide the information. Legal advice should be taken to ensure any such correspondence/documentation is compliant.

[41] See Article 17(3) of the UK GDPR Article 18(2) and 18(3) provide exceptions to the right of the individual to restrict the processing of personal data in certain circumstances.

Version 7.1: valid from April 2026

Updates

We may update this notice periodically. Where we do this we will inform members [and beneficiaries] of the changes and the date on which the changes take effect.

Contact details

If you can read this but know someone who can't, please contact us on 01743 252130 so we can provide this information in a more suitable format.

Office hours

Monday to Thursday	8:45am to 5pm
Friday	8:45am to 4pm

Helpdesk phonelines: (excluding Bank Holidays)

Monday, Tuesday and Thursday	10am to 4pm
Wednesday and Friday	10am to 1pm

Contact details

Email: www.shropshirecountypensionfund.co.uk/contact-us/

Website: www.shropshirecountypensionfund.co.uk

Tel: 01743 252130

Write: Pensions, PO Box 4826, Shrewsbury, SY1 9LJ

Administered by Shropshire Council

Data Protection Officer

You may also contact our data protection officer for further information or if you have a complaint about how we have handled your personal data.

Data Protection Officer contact

Email: information.request@shropshire.gov.uk

Phone: 01743 252179