

## **PRIVACY NOTICE FOR THE BMA STAFF PENSION SCHEME (the 'Scheme')**

B.M.A. Pension Trustees Limited is the trustee of the Scheme (the “**Trustee**”). The Trustee holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

### **What do we do with your data?**

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme, which include: the calculation, administration and payment of benefits under the Scheme before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, investment of the Scheme’s assets, risk management and de-risking exercises, or dealing with any queries or complaints regarding benefit entitlements. The legal basis for doing so is in order for the Trustee to comply with its legal obligations, and other legitimate interests, such as the efficient management of the Scheme and for other legitimate purposes relating to the operation of the Scheme.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by the British Medical Association as the Scheme’s Principal Employer, (the “**Association**”). We also hold and process data provided from: other pension schemes from which members have transferred, HMRC, the DWP, and regulatory bodies. We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member’s death which includes their name, address, and relationship to the member. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the Scheme.

The data we hold is to assist the Trustee in calculating and paying the benefits the members of the Scheme are entitled to and this includes your name, (including maiden name where applicable), address, date of birth, gender, NI number, contact details, including telephone number, mobile number and/or email address, online identifiers (for example IP address), passport number, salary, years of service with the Scheme/ the Association, name of employer, details of any pension sharing orders made on divorce, financial information, such as bank account details, and pension entitlement, marital status, employment/ retirement status, health information, and start date and leave date of membership with the Scheme and employment with the Association.

We also hold some “special category data” or “sensitive” data personal about individuals for the purposes of administering the Scheme (for example in relation to ill-health claims or death benefits). We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

The government has established pensions dashboards to allow individuals to securely access their pension information online in one place. By law, we must connect to this system, which requires preparing and matching member data to verify if an individual has a pension with us (ie. matching the Scheme’s data to “find requests” that are submitted by an individual online to the pensions dashboards system). Where you make a “find request” in relation to pensions dashboards, your personal information (including name, National Insurance number, date of birth, and address) may be shared with other pension scheme trustees and

managers and our chosen pensions dashboards provider Equisoft to respond to the request. In connection with the operation of the Pensions Dashboards, member data may also be shared with regulatory bodies like the Money and Pensions Service (MaPs), the Pensions Regulator and the Financial Conduct Authority. Please note that while there is no individual automated decision making within the Scheme, we are aware that some parts of the pensions dashboards programme may be automated.

### **Who else processes your data?**

We share your personal data with certain third parties involved in running the Scheme, for example, Isio as the Scheme's current Administrator, Helen Griffin of Willis Towers Watson as the current Scheme Actuary, Ross Trustee Services Limited, as the Secretary to the Trustee, Lane Clark and Peacock LLP, as investment and risk advisors to the Trustee, CMS Cameron McKenna Nabarro Olswang LLP as the Trustee's legal advisers, the Scheme's independent professional trustees, the Scheme's auditor, the Association, BMJ, additional voluntary contribution fund providers, insurance providers, investment advisers, and investment managers, the Trustee's bank account providers, Equisoft as our pension dashboards provider, and other regulatory bodies, for example, HMRC, the Pensions Ombudsman, the Pensions Regulator, the Pensions Advisory Service and the Money and Pensions Service using our integrated service provider (ISP), to ensure the Trustee is able to fulfil their responsibilities regarding Pensions Dashboards compliance.

In some circumstances, we are joint controllers with the Scheme Actuary, the Scheme's auditor, the Trustee's legal advisers (who process your data to comply with its professional duties as advisers to the Trustee), and the Association. The Association holds and processes your data to comply with their legal obligations as the sponsoring employer of the Scheme. The Association has a legitimate interest in the Scheme being run efficiently and have an interest in offering certain options to members, in conjunction with the Trustee. The Trustee shares information with the Association, its auditors, legal advisers, and other third party advisers for this purpose.

The Association, the Trustee, Isio, Ross Trustees Services Limited and other advisers may from time to time transfer data to other countries, including outside the UK. Special rules will apply to the protection of your personal data if it is transferred outside the UK. Where such transfers are made in the future and the receiving country is not deemed an adequate jurisdiction, the parties shall ensure that adequate safeguards are in place. Further information about these protective measures is available from [Christopher.tabersham@weareigg.com](mailto:Christopher.tabersham@weareigg.com).

### **Storage of your personal data**

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. We will retain information relating to you whilst you are a member and we will store this information for as long as we need it.

Once your membership ends, we will continue to process personal data held in relation to you for 6 years. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits, which arise after that time.

Isio's policy is to hold on to your personal data for 7 years after the termination of its retainer with its clients. The legal basis for Isio doing so is for the purpose of its legitimate interests to protect themselves against any subsequent legal claims.

### **Your rights**

You have the right to access your personal data and, require that we rectify any errors in the data that we hold, or request that we erase your personal data. You also have a right to object to the processing of your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, or request a copy of your personal data for the purposes of transmitting elsewhere. The Trustee is obliged to permit portability in circumstances where they have obtained consent or they are relying on a contractual obligation only. You can exercise your rights by contacting the Scheme's Administrator as follows: Address: BMA Administration Team, Isio, PO Box 108, Blyth, NE24 9DY, Email: BMA@isio.com Where we have requested and obtained your consent to process particular information, you can withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we will not be able to pay out the benefits you are entitled to.

### **What if you have a complaint?**

To make a complaint about how we have handled your information, contact us using the details as set out below.

This is a separate process from the process for other complaints unrelated to the handling of your information, which is called the Scheme's internal dispute resolution procedure ("**IDRP**"). Such complaints are very rare. Members are entitled to a copy of the Scheme's IDR policy. Please contact Chris Tabersham, Secretary to the Trustee, by email: christopher.tabersham@weareigg.com, if you would like to obtain a copy.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

*Address:* Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

*Telephone number:* 0303 123 1113 or 01625 545 700

### **Contact details**

The contact details of the Trustee, as the data controller of the Scheme, are as follows:

B.M.A. Pension Trustees Limited, c/o Chris Tabersham of Ross Trustees Services Limited, Secretary to the Trustee, 4th Floor, Cannon Place, 78 Cannon Street, London, EC4N 6HL.

Email: bma@weareigg.com

The Trustee reserves the right to amend this privacy notice from time to time. If we make significant changes during the period of your membership, we will inform you of those changes.

Reviewed and Updated: March 2026