



# National Grid Electricity Group of the Electricity Supply Pension Scheme

## Privacy Notice

### Privacy Policy

The Group Trustee of the National Grid Electricity Group of the Electricity Supply Pension Scheme, ('the Group Trustee', 'we', 'us'), as Trustee Directors of the National Grid Electricity Group of the Electricity Supply Pension Scheme ('the Scheme') are committed to respecting your privacy and to complying with applicable data protection and privacy laws. The sponsoring employer of the Scheme is National Grid Electricity Transmission plc, a subsidiary of National Grid plc ('National Grid').

You can visit the Group website ('website') at: <https://ngeg.nationalgridpensions.com>

The website and related services (the 'Services') are operated and managed by Wordshop on behalf of the Group Trustee, other than some aspects which are delivered by the third-party administrators, Railpen. We have provided this Privacy Notice to help you understand how we collect, use and protect the information and personal information ('Personal Data') that you provide to us. We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your Personal Data.

This notice should be read in conjunction with the [Cookies Policy](#) for the [Group website](#) of which it forms part.

### Your rights

Data Protection Law gives you the right to receive a copy of the Personal Data that we hold about you, the purpose for which we hold it and the identity of any person to whom it has been disclosed.

You have the following rights in respect of your personal data:

- to obtain access to your Personal Data together with information about how and on what basis that personal data is processed
- to rectify inaccurate Personal Data (including the right to have incomplete personal data completed)
- to erase your Personal Data in limited circumstances where it is no longer necessary in relation to the purposes for which it was collected or processed
- to restrict processing of your Personal Data where:
  - the accuracy of the Personal Data is contested
  - the processing is unlawful but you object to the erasure of the Personal Data
  - we no longer require the Personal Data for the purposes for which it was collected, but it is required for the establishment, exercise or defence of a legal claim.
- to challenge processing which we have justified on the basis of a legitimate interest
- to object to automated decision making; or
- to obtain a copy of or access to safeguards under which your Personal Data is transferred outside of the EEA.



Whenever we process your Personal Data, we do so on the basis of a lawful condition for processing. In this case, the lawful condition on which we rely is that it is in the legitimate interests of the Scheme and the management thereof and/or to satisfy our legal obligations to you.

By processing your Personal Data on this basis, we have confirmed that our interests are not overridden by your interests, fundamental rights or freedoms.

The processing of 'Special Categories of Personal Data' (previously known as Sensitive Personal Data, and including, for example, health data) must also be justified by an exemption, such as this processing being subject to your explicit consent, it being necessary for the purposes of making a determination in connection with eligibility for, or benefits payable under, an occupational pension scheme or it being necessary for the establishment, exercise or defence of legal claims. The processing of Personal Data revealing criminal convictions will only be carried out where there is a legal authorisation to do so under either EU or local law.

If you wish to contact us, please see the details in the section entitled 'Privacy Support'. You also have the right to lodge a complaint with the Information Commissioner's Office. If you wish to do so, please see the details in the section entitled 'The Information Commissioner' for further information.

### ***Collection and use of your Personal Data***

The processing of your Personal Data is regulated in the UK by Data Protection Legislation, which means the Data Protection Act 2018 and the UK GDPR (the version of the EU General Data Protection Regulation (GDPR) that was retained in UK law following the UK's exit from the EU), together with any legislation and/or regulation implementing or made pursuant to them and all other applicable laws and regulatory requirements (including any code of practice and guidance published by the Information Commissioner's Office) from time to time relating to the processing of 'Personal Data'.

The Group Trustee holds and processes certain Personal Data about you in order to administer your pension and so the Group Trustee is deemed under the Legislation to be the 'Data Controller' in respect of your Personal Data. The Group Trustee has both a legal obligation and a legitimate interest to process your Personal Data for the purpose of administering and operating the Scheme and paying benefits under it, both within and outside the European Economic Area.

We collect and use your Personal Data only with your knowledge and, for Special Categories of Personal Data, your consent. The information we may hold includes your name, address, email address, phone, date of birth, gender, relevant employment history, national insurance number, bank details, HRMC details and we may hold Special Categories of Personal Data e.g., health information. We may also hold data (including Special Categories of Personal Data) about your spouse, dependants or other potential beneficiaries. In the event that you are providing the Group Trustee with any of this special category information, you will be asked to complete a consent form.

We 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 service to Group members. We typically collect your Personal Data when you use services, make customer enquiries, register for information or other services, or when you respond to communications from us (such as questionnaires or surveys).

Our general approach is to only retain Personal Data for as long as is required to satisfy the purpose for which it was collected by us or provided by you. In certain cases, legal or regulatory obligations require us to retain specific records for a set period of time. In other cases, we deliberately retain records in order to resolve queries or disputes which we think may arise from time to time.



### ***Joint Data Controllers and other Data Controllers***

Where two or more parties jointly determine the purposes and means of processing Personal Data (using the same Personal Data for the same purposes), they will be joint Data Controllers. Each joint Data Controller has full liability resulting from a Personal Data Breach, unless one of the joint Data Controllers can show that it is not in any way responsible.

Owing to the nature of their role, Aon Solutions UK Limited (Aon), the Group Actuary, is deemed a Joint Data Controller of Scheme Personal Data alongside the Group Trustee. More information on Aon Solutions UK Limited and their role in managing Group data is provided below.

The Group Trustee has also appointed DLA Piper UK LLP to provide legal advice to the Group Trustee, and Club Vita LLP to provide longevity and demographic analysis to the Group Trustee. They are both Data Controllers in their own right, rather than Joint Data Controllers. More information on DLA Piper and Club Vita, and their roles in managing Group data is provided on page 3 and 4 below.

As Data Controllers, Aon, DLA Piper, and Club Vita have an obligation to provide information about their processing activities to the individuals whose data they access so that members can clearly identify what the Group Trustee does with their personal data, and what Aon, DLA Piper and Club Vita do with their personal data.

### ***Aon Solutions UK Limited – Actuarial Advisers***

The Group Trustee has appointed Aon Solutions UK Limited to provide pensions advisory and calculation services that relate to the membership of the Group. In doing so Aon will use personal information about members such as name and contact details, information about pension contributions, age of retirement, and in some limited circumstances information (where this impacts your retirement age) about health, in order to be able to provide these services. The purposes for which Aon uses personal information will include (amongst other services) management of the pension scheme, funding the Group, liability management, estimating future mortality, improving modelling of mortality and other demographic assumptions, and Group Actuary duties.

More detail about Aon's use of Group members' personal information is set out in their full Privacy Notice available online at: <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>

Alternatively, you can request a copy by contacting contact Aon, including reference to the Group's name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH or via e-mail to [RI.UK.PrivacyChampions@aon.com](mailto:RI.UK.PrivacyChampions@aon.com)

### ***DLA Piper UK LLP – Group legal adviser***

The Group Trustee has appointed DLA Piper to provide legal advice to the Group Trustee. In doing so, DLA Piper may use any of the personal information about members that the Group Trustee provides to them in order to advise on entitlement to benefits, the application of the Scheme rules or legislative requirements or to advise on the resolution of disputes. DLA Piper will never share your information with any other person without the Group Trustee's prior consent.

More detail about DLA Piper's use of personal information is set out in their full Privacy Notice available online at <https://www.dlapiper.com/en/uk/privacy-policy/>

Alternatively, you can request a copy by contacting DLA Piper at [privacyteam@dlapiper.com](mailto:privacyteam@dlapiper.com) or by telephoning 020 7349 0296.



### ***Club Vita LLP - Demographic analysis***

The Group Trustee will pass your data to Club Vita, a longevity comparison club for pension schemes, in order to receive analysis on longevity and other demographic patterns which it will then consider when developing the assumptions used in projecting benefit payments into the future. Club Vita will continue to use the data that it gathers from all contributing pension schemes to further develop its knowledge and understanding of the demographic patterns amongst pension scheme members, sharing these insights in reports shared with pension schemes and other interested parties.

Please be assured that Club Vita's reports are fully anonymised and neither the Scheme nor individual members can be identified from those reports. Here is a link to Club Vita's Privacy Notice: <https://www.clubvita.net/uk/privacy-policy>

### ***To whom will your Personal Data be disclosed ('Recipients')?***

Your Personal Data may, for the Purposes (see definition below), be disclosed for processing in any jurisdiction where the Scheme operates to:

- Railpen, UK Pensions Operations and their employees
- Barnett Waddingham LLP, Trustee Services provider and their employees
- Relevant employees of National Grid plc (or any UK subsidiary of the Company, participating in the Scheme) such as the HR and Payroll departments
- Third party service providers who use your Personal Data to provide services to us ('Service Providers') including tracing and verification services;
- Insurers and reinsurers (as defined below) for the purposes of relevant Liability Management Exercises
- Auditors, contractors or other advisers auditing any of our business processes, ('Third Parties'); and
- Advisers to the Scheme, including but not limited to covenant Advisers, actuaries and legal Advisers ('Advisers').

For a full list of Advisers to the Scheme, please contact: NGEG Trustee Services, Barnett Waddingham LLP, 3 Devon Way, Longbridge, Birmingham B31 2TS, or by email to: [NGEGESPS@Barnett-Waddingham.co.uk](mailto:NGEGESPS@Barnett-Waddingham.co.uk).

Any processing performed by the Recipients will be governed by a data processing agreement in the form required by law, preserving any, and all, of your statutory data protection rights.

### ***How your Personal Data is processed ('Purposes')***

Where you provide us with Personal Data, this will be processed for the following Purposes by the Scheme and Recipients to:

- Calculate your benefits, including online calculations that you request
- Identify what benefits are, or might be, payable to you or, in the event of your death, any beneficiaries
- Deal with any queries or disputes you may have about your benefits



- Communicate with you by electronic means, including online, by post or by other means to keep you updated on matters related to the Group
- Provide you with information about your benefits and options available to you

Comply with any legal and regulatory obligations for which the provision or processing of your Personal Data is required

- Conduct electronic checks to verify your identity or address (for example, checks against public registers or credit scoring agencies)
- Calculate and manage the Scheme liabilities:
  - This includes (where considered appropriate) the Scheme engaging in appropriate liability management exercises ('Liability Management Exercises') including but not limited to longevity swaps, liability driven investment, bulk annuities, buy-in or buy-out exercises or pension increase exchanges. In such cases this may include your Personal Data (including your name, gender, contact and identification details and information relating to your status as a beneficiary of the Scheme) being:
    - shared with regulated insurers or reinsurers (and their Advisers), including those selected by the Group Trustee to secure, insure, or otherwise provide liability management services to the Scheme (whether directly or indirectly)
    - shared and processed to assist in calculating the prices payable and payment flows for Liability Management Exercises
    - shared with and processed by an insurer or reinsurer for business analysis research, financial reporting, internal reserving, and pricing purposes including in connection with improving its models of UK longevity and mortality risk
    - shared by an insurer or reinsurer with its affiliates or other third parties which carry out administration services on its behalf
    - shared and processed by auditors or contractors or other third parties ('Third Parties') auditing or regulating any of the business processes of an insurer or reinsurer; and
    - shared by an insurer or reinsurer with and processed by any organisation which purchases an interest in any insurer or reinsurer or to which an insurer or reinsurer has otherwise passed the risk it has assumed offering all or part of a Liability Management Exercise for the Scheme (or their Advisers), including where the sharing or processing of your Personal Data is required to comply with legal and regulatory obligations.
  - Where your Personal Data is shared with an insurer or reinsurer as part of a Liability Management Exercise, you acknowledge that the insurer or reinsurer will act as a Data Controller of any Personal Data that it receives from us and may:
    - use and otherwise process your Personal Data in the manner as described above in this Privacy Notice (including outside of the European Economic Area); and
    - disclose your Personal Data to the entities as described above in this Privacy Notice for the legitimate interests of the insurer's or reinsurer's and those of the entities to which the Insurer discloses your Personal Data, namely, to allow it to provide liability management services to the Scheme and to carry out the activities described above in this Privacy Notice.
  - If you have any questions about an insurer's or reinsurer's use of your Personal Data as part of a Liability Management Exercise or if you wish to exercise any of your rights under the Data Protection Legislation (including but not limited to your right to request: (i) a copy of the Personal Data that an insurer or reinsurer holds about you; (ii) that an insurer or reinsurer corrects any inaccuracies in such



Personal Data; and/or (iii) that an insurer or reinsurer stops processing your Personal Data in the manner described in this Privacy Notice), please contact us and we will be able to communicate this request to the insurer or reinsurer.

- Where your Personal Data is shared with an insurer or reinsurer as part of a Liability Management Exercise, we will require any insurer or reinsurer or other person with whom Personal Data is shared to:
  - Agree to comply with all relevant Legislation, including (but not limited to) the Legislation as it relates to data processing, the retention of Personal Data, the establishment and maintenance of data security and lawful bases of processing
  - Agree that in circumstances where there has been a data breach in respect of your Personal Data that the insurer or reinsurer or other third party will notify all other relevant parties including the Group Trustee without undue delay and co-operate with the provision of information to either any parties the Liability Management Exercise or any notifications to the relevant authorities (for example the Information Commissioner's Office) or to you, as a 'Data Subject
  - Agree that where they receive any enquiries from Data Subjects or supervisory authorities, any complaints, notices or communications relating to the processing of Personal Data or compliance with Legislation or requests from you (or your beneficiaries):
    - where they relate to the insurer's or reinsurer's or other third party's data processing or compliance with Legislation then they shall deal with them in accordance with the requirements of Legislation and will notify the Group Trustee (unless prohibited by Legislation)
    - where they relate to the Group Trustee's data processing or compliance with Legislation then the insurer or reinsurer or other third party shall notify the Group Trustee and shall not deal with them.
  - Agree to comply with, and to ensure that any of the insurer's or reinsurer's or other third party's appointed Third Parties, Advisers, contractors or other associates comply with, the data protection arrangements and Legislation currently in place of the Personal Data in respect of Cross Border Transfers, both within and outside of the EEA (please see the 'Information Security - Cross Border Transfer' section below)
  - Assume the status of a Data Controller for the purposes of any such Liability Management Exercise; and
  - Ensure the continued data protection and confidentiality of any, and all, Personal Data passed to them, and to ensure they have onward binding confidentiality agreements in place in respect of any of their Third parties, Advisers, contractors or other associates.
- Where your Personal Data is shared as part of a Liability Management Exercise your rights under the Legislation are unaffected



- The Group Trustee has undertaken a Liability Management Exercise in respect of some Members of the Scheme and as such has shared Personal Data with an insurer and their reinsurer. Each of these is now a data controller in respect of this Personal Data. Their names and details are as follows:
  - Zurich Assurance Ltd (the insurer in respect of this Liability Management Exercise), which is a company registered in England and Wales under registration number 02456671, whose registered address is at The Grange, Bishops Cleeve, Cheltenham, GL52 8XX; and
  - The Canada Life Assurance Company, (the reinsurer in respect of this Liability Management Exercise) whose registered office is at 330 University Avenue, Toronto ON M5G 1R8, Canada, acting through its Barbados branch, established under the laws of Barbados, whose principal place of business in Barbados is at Fourth Floor, Cedar Court, Wildey St. Michael, BB14006, West Indies.

If you have any questions in respect of this Liability Management Exercise, or require further details, please contact us using the details provided in the section entitled 'Privacy Support & How to Contact Us'.

In the event that the Purposes for processing your Personal Data change, you will be notified as soon as practicable and as required we will seek your consent or otherwise ensure a legitimate basis for this Purpose in accordance with the Data Protection Legislation where such notification relates to a new additional purpose for processing.

### ***Information Security***

We are committed to ensuring that your Personal Data is secure. We believe we have appropriate technical and contractual measures to protect the Personal Data that is under our control from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction, or accidental loss and to ensure that information is only shared for the reasons, and by the means, set out in this notice.

Any individuals or organisations which have access to or are associated with the processing of your Personal Data (included our employees) are obliged to respect the confidentiality of your Personal Data and comply with the relevant Legislation.

We ensure that your Personal Data will not be disclosed to government institutions or authorities except if required by law or when requested to by regulatory bodies or law enforcement organisations.

Please use the details in the 'Contact Us' section if you would like further information about the safeguards that we use to protect your Personal Data.

### ***Cross Border Transfers (within and outside of the EEA)***

Since National Grid operates globally, it may be necessary to transfer your Personal Data to other companies within National Grid which are located in other countries, including those both inside and outside of the EEA.

For the avoidance of doubt, the European Economic Area (EEA) currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein. All countries within the EEA are bound by the General Data Protection Regulation and therefore have similar standards for the protection of Personal Data.

However, sometimes your Personal Data may need to be transferred outside of the EEA. Such transfers may happen, for example, where our servers or our advisers and service providers have IT systems located in jurisdictions outside of the EEA or where you use our services and products while visiting countries outside of the EEA.



Where any of your Personal Data is transferred outside the EEA, we will take steps to ensure that it receives an adequate level of protection. For example, we may seek to enter into, or require third parties to enter into, data transfer agreements or will ensure that third parties are certified under appropriate data protection schemes.

You have a right to request a copy of any data transfer agreement under which we transfer your Personal Data, or to otherwise have access to the safeguards which we use. Any data transfer agreement made available to you may need to be redacted for reasons of commercial sensitivity.

### ***Google Analytics***

The Group Trustee uses Google Analytics to help analyse how users use our sites. This analytical tool collects standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google.

This information is then used to evaluate the use of the website and to compile statistical reports on website activity for the Group Trustee.

The Group Trustee will not (and will not allow any third party to) use the statistical analytics tool to track or to collect any personally identifiable information of visitors to our sites. We will not associate any data gathered from our sites with any personally identifying information from any source as part of our use of the Google statistical analytics tool. In order for all this to work, Google Analytics uses a mechanism called 'cookies'.

### ***Cookies***

A cookie is a small amount of data, which often includes an anonymous unique identifier, which is sent to your browser from a web site's computers and stored on your computer's hard drive. The Group Trustee may set and access the cookies on your computer. The [Cookies policy](#) is available from the [Group website](#).

Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a web site to access the cookies it has already sent to you, not the cookies sent to you by other sites.

### ***Choices about cookies***

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. (Each browser is different, so check the 'Help' menu of your browser to learn how to change your cookie preferences.)

If you reject all cookies, you will not be able to use the products or services that require you to 'sign in' and you may not be able to take full advantage of all offerings.

### ***The Group Trustee Practices regarding cookies***

The Group Trustee uses its own cookies for a number of purposes, including to:

- Keep track of preferences you specify while you are using the services
- Estimate and report our total audience size and traffic
- Conduct research to improve the content and services.





### ***Use of Your Personal Information submitted to other websites***

We are not responsible for the privacy policies and practices of other websites even if you accessed the third-party website using links from our website or you linked to our website from a third-party website.

We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have any concerns or questions.

### ***The Information Commissioner***

The Information Commissioner is the UK's independent authority set up to uphold information rights and data privacy for individuals. You have the right to lodge a complaint with the Information Commissioner if you are dissatisfied with any aspect of the way that we collect and use your personal information.

The Information Commissioner's website can be found at <https://ico.org.uk/> or you can call their helpline on 0303 123 1113.

**Policy last reviewed/updated 5 June 2023**