FPN Notice: Member

Your privacy rights when you've been given access to a Nest account

The purpose of this document is to inform you about the type of information we hold about you, how we use it and to let you know your rights. The National Employment Savings Trust (Nest) Corporation exercises control over the processing of the data we hold about you and carries the data protection responsibility for it. In legal terms this is referred to as being the 'data controller'.

About your personal information and where we obtain it*

When your employer enrolled you into Nest they provided us with information about you, as outlined in your Welcome to Nest letter. You, or your delegate, will also provide us with personal information about you, from time to time, in order to administer your account. We may also receive information about you from third parties we work with. These could include our service providers, payroll providers chosen by your employer or third party agencies checking your identity or the validity of your bank account. We may also receive information from regulatory authorities or government departments, such as HM Revenue & Customs who provide us with tax relief rates where applicable.

How we'll use your personal information*

We'll use this information to manage your Nest account, in accordance with our legal obligations under the Nest Order and Rules. We can use this to:

- provide services and information you request from us in relation to your account
- improve our service offering, including through surveys and research activities
- see if and when you open the secure messages, emails or links we send you.

We may use your personal details to provide you with other information you've consented to receive. You can withdraw your consent at any time. We explain how* at the time you give consent.

If you use our website, we may also use your personal information to monitor the traffic and performance of our website in accordance with our cookies policy. If you'd like to change your cookie settings, go to our cookies policy page at **www.nestpensions.org.uk/cookiespolicy**.

What personal information we use and how long we keep it*

Data we use	How long we keep it for (because pensions are for the long term)
Individual member details: including surname, forenames, previous names, National Insurance number, job title, date of birth, gender, telephone number, phone recordings and transcripts, correspondence address (current and historic) and	We'll keep this information for 15 years after your death or 150 years from your birth where we've not been notified of your death. This is referred to the 'main retention period' in the rest of this document. This excludes: 1. your identification documents, which we'll keep for 15 years after the earliest of: – the date we pay out your retirement pot in full – the date you transfer your retirement pot out of Nest

Data we use	How long we keep it for (because pensions are for the long term)
billing address, email, copies of identification documents (including birth, marriage/civil partnership, death certificates)	– the date of your death or 150 years from your birth where we've not been notified of your death. 2. information in relation to your death, which we'll keep for 15 years following the payment of your retirement pot in full.
Building your retirement pot details: including date(s) of joining Nest, starting and stopping contributions at each of your registered employers, pension opt in/out records, intended retirement date, contribution history, investment history and choices, retirement pot value, annual statements	We'll keep this information for 15 years after the earliest of: 1. the date we pay out your retirement pot in full 2. the date you transfer your retirement pot out of Nest 3. date of your death or 150 years from your birth where we've not been notified of your death This excludes information in relation to opting out which we'll keep for 15 years following the earliest of: 1. the date we receive the notice that you asked to opt out 2. the retirement date in respect of your retirement pot.
Taking your money out of Nest details: including taking money out for retirement, transfers-out and distribution of death benefits, nomination of beneficiary form or similar forms for other beneficiaries or personal representatives, beneficiary ID information, incapacity information including medical evidence	We'll keep information in relation to transfers-out or the selection of benefits payable by Nest for the main retention period. We'll keep information in relation to the payment of your retirement pot after your death for 15 years after the date of the last payment out, or 150 years from your birth where we've not been notified of your death. We'll keep information in relation to incapacity for 15 years after the date of the decision confirming you meet the incapacity requirements.
Specific member event details: including complaint information, pension sharing order, earmarking order, losing rights to your retirement pot (whether due to expiry of time or on grounds of loss to the employer or Nest arising from criminal, negligent or fraudulent activity by the member)	We'll keep information in relation to complaints for 15 years from the later of: 1. the date of Nest's decision in relation to your complaint 2. the date we pay out your retirement pot in full 3. the date you transfer your retirement pot out of Nest. We'll keep information in relation to a pension sharing order or earmarking order the main retention period. We'll keep information in relation to losing rights to your retirement pot for 15 years from the date of losing the rights. This excludes the record that you've lost the right to your retirement pot which we'll keep for the main retention period. If the right to your retirement pot isn't lost in full, we'll keep your information 15 years from the later of: 1. the date of losing the right to what's in your retirement pot 2. the date you transfer out the remaining balance of your retirement pot 3. the date of the payment in full of the remaining balance of your retirement pot.

For any other data not described above*, we'll keep it for 15 years after the earliest of

1. the date we pay out your retirement pot in full,
2. the date you transfer your retirement pot out of Nest,

3. date of your death or 150 years from your birth where we've not been notified of your death.

In addition, we may keep your personal information for a longer period of time than mentioned above for archiving or research purposes*, or in the event of ongoing disputes, claims, complaints or data migration.

Passing on your personal information to third parties

We may need to pass your personal data on to selected and trusted third parties*. The third parties we may share information with are:

- The Pensions Regulator (TPR) or other regulatory or governing bodies for compliance purposes
- government bodies and departments, or other third parties, for research and statistical purposes
- third-party processors and any third party to whom we may need to disclose personal information to comply with our legal, regulatory and statutory obligations or as part of a legal process
- any other third party where you've given your consent, including the pensions finder service
- third parties to provide information about our service through digital channels such as social media and display.

When we outsource any processes we ensure any supplier or contractor we use has adequate security measures in place. We also require them to comply with privacy principles as part of our contract with them.

Security and safe storage of your personal information

We'll use appropriate procedures and security features to process and protect your information. Information we hold about you may be transferred* and stored by us, our agents or contractors for research purposes or to provide services to you, outside the European Economic Area*. Where this happens, we use the model clauses* as issued by the European Commission or other appropriate safeguards* where applicable.

How you can access and correct your personal information

You can correct the information we hold about you from your online Nest account or you can contact us at Nest, Nene Hall, Lynch Wood Business Park, Peterborough, PE2 6FY. You have the right to make a request to:

- access all personally identifiable information that we hold about you
- restrict or object to the processing of the personal data we hold about you
- erase your personal data
- receive personal data about you that you have provided to us in a structured, commonly used, machine-readable format where we use it with your consent.

To make a request under these rights you can write to us at Nest, Nene Hall, Lynch Wood Business Park, Peterborough, PE2 6FY or email us at **support@nestpensions.org.uk**

Queries and further information

The information provided here is in addition to any other privacy information we may give you.

- You can view our cookies policy at **www.nestpensions.org.uk/cookiespolicy**
- You can contact our data protection officer at **dpo@nestcorporation.org.uk**
- You can write to us at Nest, Nene Hall, Lynch Wood Business Park, Peterborough, PE2 6FY

If you have concerns about the way we handle your personal data and you think we haven't dealt with them properly, you can contact the Information Commissioner's Office* or raise a complaint at **www.ico.org.uk/concerns**

***You'll find more information on the items marked by an asterisk* and our privacy policy at www.nestpensions.org.uk/privacypolicy**