



## MERCHANT NAVY OFFICERS PENSION FUND (THE "SCHEME")

### PRIVACY NOTICE

MNOPE Trustees Limited (the "**Trustee**", "**we**", "**our**") is committed to protecting and respecting your privacy. This Privacy Notice explains the types of personal information we collect, how we use that information and who we share it with in order to properly manage and administer the Scheme, and also sets out how we protect that information.

Please read the following carefully to understand our views and practices regarding your personal information, and how we will treat it.

#### Who we are

We, the Trustee, are the 'data controller' for the purposes of data protection legislation. Our registered office and correspondence address is C/O Sacker & Partners LLP, 20 Gresham Street, London, England, EC2V 7JE.

For members, beneficiaries or any individual with a query or complaint in relation to the Scheme: The Trustee's representative is Aptia UK Limited, as administrator for the Scheme, who may be contacted about any privacy questions you may have using the contact details below.

For employers, Trustee directors and third party service providers: The Trustee's representative is Rock Pensions (the trading name of Rock Strategic Consulting Ltd), who may be contacted about any privacy questions you may have at [employer.enquiries@mnope.co.uk](mailto:employer.enquiries@mnope.co.uk).

#### Information covered by this Privacy Notice

This Privacy Notice covers all personal information collected and used by the Trustee. "**Personal data**" or "**personal information**" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This may include the types of information set out below.

#### What information do we collect from or about you?

The Trustee may collect information about you from the following sources to administer the Scheme:

##### *Information we receive from your current or former employer:*

When you were first enrolled into the Scheme, your employer may have provided us with the following information:

- Information about you, such as name, date of birth, sex, postal address and national insurance number;
- Information about your employment history, such as pensionable pay, length of service, recruitment and termination details, attendance record, health and safety records, security records, job title and job responsibilities, financial details such as income and salary.

##### *Information we receive from you:*

When you correspond with us, we may receive the following information:

- Information about you, such as name, date of birth, sex, postal address, email address, phone number, bank details, national insurance number, HMRC details and passport number;
- Information about your family, such as current marriage and partnerships and marital history, details of family and dependants;
- Information about your health, such as in the context of ill-health application forms;



- Information about your employment history, such as pensionable pay, length of service, employment and career history, recruitment and termination details, attendance record, health and safety records, security records, job title and job responsibilities, financial details such as income, salary, assets and investments, bank account details to process pension payments, benefits, grants and insurance details.

#### *Information we collect about you:*

When you visit our website, we may automatically collect the following technical information:

- Technical information, including your IP address, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;
- Information about your visit, including the websites you visit before and after our website;
- Length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.
- If you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a “pensions identifier”, which is a string of characters used to identify your specific benefits under the Scheme.

#### *Information we receive from other sources:*

If you are a Scheme member, we may receive information about you from third parties; for example, anyone entitled to benefit under your membership of the Scheme or (in certain circumstances) a tracing agency who may use a range of sources such as the electoral roll. We might also collect information from HMRC, the Pensions Ombudsman, your next of kin or (with your consent) from registered medical practitioners.

If you are a beneficiary under the Scheme nominated by a member, we may receive information about you from a member who nominates you to be a beneficiary of the Scheme. For example, a member may nominate you to receive lump sum death benefits in the event of their death.

#### *Sensitive personal information*

Some of the personal information provided about you may be sensitive personal information (also known as special categories of personal data), such as details about your health in the case of an application for ill-health early retirement. In these circumstances, you will be asked to provide consent. This will enable the Trustee to process your sensitive personal information for the purposes set out in the form. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

#### **How do we use your personal information?**

| <b>We may use your personal information:</b>  | <b>How do we use personal information for this purpose?</b>  | <b>What is the legal basis for us processing your information in this way?</b>   |
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| To administer and manage the Scheme, including taking financial decisions regarding investment, conducting member tracing (in relation to members' personal data) and providing benefits under the Scheme | <p>We will operate the Scheme over the course of its life which will require us to process individual data (e. g. calculating the pension each member may be entitled to at retirement).</p> <p>We will also make investment decisions to provide the benefits under the Scheme. These may include entering into contracts with third parties which require information about Scheme members</p> | <p>It is necessary in our legitimate interest to use your personal information for the purposes of administering the Scheme in order to pay each member's benefits.</p> <p>The processing of your personal information may also be necessary to comply with the Trustee's legal obligations under the Scheme's Trust Deed and Rules and under pensions</p> |

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|  | <p>in order to offer the investment (e. g. buy-in of certain member benefits with an insurer).</p> <p>We will also need to process the personal information of staff at the employers of Scheme members, Trustee directors and third party service providers (e.g. business contact information) for the purposes of operating the Scheme.</p>   | <p>legislation to provide members with their promised benefits.</p>  |
| <p>To deal with any enquiries from you and correspond with you about the Scheme, including any changes to our services</p> | <p>We will need to use your personal information such as your contact details and information about your membership to communicate with you and assist with queries.</p> <p>We will also need to process personal information relating to staff at the employers of Scheme members, Trustee directors and third party service providers (e.g. business contact information) when we correspond with these parties about the Scheme.</p>  | <p>It is necessary in our legitimate interest to use your personal information for the purposes of administering the Scheme in order to pay each member's benefits.</p>  |
| <p>To facilitate discussions regarding the Scheme with the employer and member forums</p>                                  | <p>If you participate in an employer or member forum we will need to use your personal information such as your contact details to communicate with you on forum activity.</p>   | <p>It is necessary in our legitimate interest to use your personal information for the purposes of facilitating forum discussion on the operation of the Scheme.</p>   |
| <p>To pay benefits to members' nominated beneficiaries</p>   | <p>We process the personal information of members' nominated beneficiaries where this is necessary to pay benefits to those beneficiaries in accordance with the member's wishes.</p> <p>Sometimes we may need to collect and process information about a beneficiary's health or sexual orientation (we will never ask specifically for information concerning sexual orientation, but it may sometimes be possible to infer this from the information provided about the beneficiary, such as their name and relationship to the member). Where we collect this information, we will ask members to confirm that they have beneficiaries' consent to provide it to us.</p> | <p>It is necessary in our legitimate interest to process personal information concerning nominated beneficiaries in order to pay benefits to those beneficiaries in accordance with a member's wishes.</p> <p>Where making payments to beneficiaries involves collecting and processing information about a beneficiary's health or information from which their sexual orientation could be inferred, we will ask members to confirm they have the beneficiary's consent to provide us with this information.</p> |
| <p>To analyse and improve the activities, services and information offered by the Scheme website</p>                       | <p>We may collect technical information, such as your IP address, operating system and</p>   | <p>It is necessary in our legitimate interest to ensure that content on the website is presented in the most effective manner for</p>  |

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|  | <p>platform or conduct surveys of your experience on our website.</p> <p>We may need to process and sometimes share your information to undertake a tracing exercise if we should happen to lose contact with you (e.g. to ensure you receive the correct benefits and reduce the risk of impersonation fraud).</p>  | <p>you and your computer for the purposes of administering the Scheme and paying each member's benefits.</p> <p>We may rely on your consent to collect sensitive information about you (e.g. in relation to ill-health applications).</p>  |
| For the purpose of keeping internal records  | <p>We will keep records of your personal information, such as your name, national insurance number, records of your salary and details of your dependants in order to administer the Scheme. We will also keep your contact details on record in case we need to provide you with any information on the Scheme.</p>   | <p>It is necessary in our legitimate interest to keep records of your personal details and any correspondence with you for the purpose of administering the Scheme and paying each member's benefits.</p> <p>It is necessary for the establishment, exercise or defence of legal claims to store some sensitive personal information (such as historic ill-health application forms) in the event of a future query.</p> |
| To comply with legal requirements, including in relation to pensions dashboards  | <p>We may need to process personal information to comply with legal requirements to which we are subject (e.g. in situations where we would need to consult with all members as required by pensions legislation).</p> <p>This includes "matching", where we use personal data that a user has provided to a pensions dashboard to search our Scheme records to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a "possible match".</p> | <p>It is necessary for us to process certain personal information for the purposes of complying with legal requirements to which we are subject.</p>   |
| In connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets  | <p>If the business of any employer participating in the Scheme is reorganised and/or sold by way of a share sale or business transfer, we may need to share information in this context to ensure that the Scheme is taken into account.</p>   | <p>It is necessary in our legitimate interest to share personal information in this way in order to facilitate the operation of the Scheme.</p>  |
| To consider and/or facilitate, if the Trustee considers it appropriate, liability management exercises or member option programmes from time to time to give | <p>We will need to process and sometimes share your personal information in order to accurately undertake liability management activities. Sharing your information would only occur for activities which</p>  | <p>It is necessary in our legitimate interest to process and sometimes share your personal information in order to facilitate the operation of the Scheme.</p>   |

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| <p>members the choice to alter their benefits and/ or to manage or reduce Scheme liabilities. Such exercises include, but are not limited to, activities such as:</p> <ul style="list-style-type: none"> <li>• Insuring Scheme liabilities</li> <li>• Scheme mergers</li> <li>• Bulk transfers</li> <li>• Pension increase exchanges or coordinated transfer value exercises</li> </ul> | <p>require third-party involvement e.g. insuring Scheme liabilities with an insurer would require sharing some of your personal information with insurance companies.</p>  |   |
| <p>To assist with the administration of benefits under supplementary or related pension schemes offered by your former, current or prospective employer.</p>  | <p>If you are a member of another pension scheme under which your benefits are calculated by reference to your pension under the MNOFP, or which may otherwise be relevant to your benefits under the MNOFP, we may share your personal data with the trustees or managers of that pension scheme.</p> | <p>Sharing certain personal data is necessary for our, and the other pension scheme's trustees/managers', legitimate interest in efficiently administering the Scheme and their pension scheme respectively (including calculating benefits for the relevant scheme's members).</p> |

### Who may use your personal information?

We share your personal information with third parties, where this is necessary to administer the Scheme and/or comply with contractual obligations relating to it.

We share your personal information with the following third-party organisations:

#### 1. Executive services

Rock Pensions (the trading name of Rock Strategic Consulting Ltd) provides certain pensions management, executive and secretarial services to the Trustee and will require access to your personal information in order to carry out those functions. Rock Pensions will process your personal information on our behalf as our data processor.

#### 2. The Scheme's administrator

We have appointed Aptia UK Limited as administrator for the Scheme (we may change this appointment from time to time, in which case we will update this notice) (the "**Administrator**"). The Administrator carries out the pensions administration services on behalf of the Trustee and will require access to your personal information in order to calculate and pay benefits under the Scheme. It will also perform other activities such as responding to requests or complaints and providing information to members, and so will require access to your contact details. The Administrator will process your personal information on our behalf as our data processor.

#### 3. The Scheme Actuary

We also share your information with the Scheme Actuary, K. Farnum of Willis Towers Watson Limited, who is a data controller in respect of your personal data that she uses to carry out her functions. For more information, the Scheme Actuary's privacy notice can be found at

<https://www.willistowerswatson.com/en-gb/notices/How-Willis-Towers-Watson-uses-personal-data-for-actuarial-services-to-UK-pension-scheme-trustees>.

#### 4. Participating employers of the Scheme

This may include your former, current or prospective employer. Your personal information will only be shared with these entities to the extent that this is necessary for the administration of your pension benefits.

#### 5. Other pension schemes

If your former, current or prospective employer operates or participates in another pension scheme which you are part of and which depends on data from the Trustee to calculate your benefits under that scheme, or which may otherwise be relevant to your benefits under the MNOPF, we may share your personal information with trustees or managers of that pension scheme. We do this so that both we and the other pension scheme can calculate your benefits and efficiently administer your pension under the relevant pension scheme.

#### 6. Other third-party service providers

- a) In certain circumstances, we share your personal information with third-party organisations such as auditors and legal advisors who may also be data controllers in relation to your personal information.
- b) Other third-party organisations such as investment consultants and insurers may also process personal information on our behalf as data processors. We ensure that your information is kept secure by checking that their security measures are adequate and by entering into agreements with such third parties which specify that they must only process personal information on our behalf and according to our instructions.
- c) We will also share your personal information with third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, as well as the Scheme’s Integrated Service Provider (ISP), which provides a service allowing pensions information from the Scheme to be connected to the dashboard ecosystem.

A list of advisors to the Scheme, with whom we may share your personal information, can be found on the Scheme website at <http://www.mnopf.co.uk/advisers.html>.

#### 7. Third parties permitted by law

- a) In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, local or foreign regulators, HMRC, or to judicial or administrative authorities).
- b) We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights or protect your rights or those of the public.

Any personal information held by us and any third-party will be treated as confidential. We will not sell your personal information to third parties.

#### Where we store your personal information

In certain circumstances, the personal information that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom. In particular, some of the personal data we collect may be transferred to and stored in India. Your personal data may also be processed by staff operating outside the United Kingdom who work for us or for one of our service providers. We will take



all steps necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and all applicable data protection laws, including, where relevant, entering into standard contractual clauses (or equivalent measures) with the party outside the United Kingdom receiving the personal information.

## **Your rights**

You have the legal right to request details of the personal information that we hold about you, to ask us to stop processing your information where you have previously consented to us doing so, to have it corrected or deleted in certain circumstances, and not to be contacted by us if you do not wish to be.

### *Your right to access the information we hold about you*

You can request access to the information we hold about you by contacting us using the contact details set out below. Our file of your information will usually be made available to you within 30 days, although occasionally we may not be able to give you access to the personal information we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety). Please note that in limited circumstances, we may apply an administrative charge for providing access to your information. Any such charge will be reasonable and we will advise you of the charge and obtain your consent before providing you with access to your personal information. Please note that if you request a copy of your data using electronic means (such as email), then we will provide a copy of your information in electronic form unless you ask us to do otherwise.

### *Your right to have your information corrected or deleted*

If any of the information we hold about you is inaccurate or out of date, such as the information included in your benefit statement, or you would like it deleted, please email your request to [enquiries@mynopfpension.co.uk](mailto:enquiries@mynopfpension.co.uk) and we will consider your request as soon as possible. The Trustee can override this request in certain circumstances.

### *Your right to object to us processing your personal information*

Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

### *Your right to restrict processing of your personal data*

You have the right to restrict our processing of your personal information where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it. The Trustee can override this request in certain circumstances.

### *Your right to have your personal information transmitted to another organisation*

Where we hold personal information about you that you have provided to us or that has been generated by your activity as a member of the Scheme, and we hold this information with your consent, you have the right to ask us to provide you with the personal information we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that personal information to another organisation.

### *Your right to withdraw consent to your data being processed*

If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.

## Making a complaint

We would be happy to address any concerns you have directly and as a first port of call. If you believe that we have not complied with applicable data protection laws and you have a need to escalate your complaint, you have the right to lodge a complaint with the UK's Information Commissioner's Office ("ICO").

The contact details for the ICO are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane, Wilmslow  
Cheshire, SK9 5AF  
Tel. 0303 123 1113

Website: <https://ico.org.uk>

## Contacting us

If you have any questions or concerns about how we treat your personal information or you would like to request a copy of the personal information we hold about you, please contact the Administrator at [enquiries@mymnopfpension.co.uk](mailto:enquiries@mymnopfpension.co.uk) or by writing to us at:

myMNOPFpension,

Maclaren House  
Talbot Road  
Stretford  
Manchester  
M32 0FP

Please include your reply address when you write to us.

## How long do we keep your personal information?

Your personal information is stored by us and/or our service providers strictly to the extent necessary for the performance of our obligations, and for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws and our data retention policy. In the context of providing pension benefits, this period is extensive.

Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction.

We will typically store your personal information for the life of the Scheme (or, in the event that the Scheme were to wind up, for 15 years after such time). Retention of your personal information enables us:

- to process and pay your benefits and benefits that may be payable after your death;
- to respond to queries from members or your beneficiaries about your correct benefit entitlement, which queries may be received many years after members have transferred out or taken a refund of contributions or made elections to change their benefits;
- to correct or uplift benefits if circumstances come to light that require this, potentially long after members have drawn their benefits or left the Scheme; and
- to respond to legal claims.

When we no longer need to use your information, we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).



### **How do we keep your personal information secure?**

Any information held by the Trustee is stored electronically within a secure portal. Your information is protected through the use of password protection, user access restrictions and encryption.

The Trustee take steps to confirm that any third-party service provider that collects and stores personal data, whether in hard copy or electronic format, on behalf of the Trustee, acting as processor, has taken appropriate technical and organisational steps to ensure the security of your personal data. Such measures may include holding hard copy data in physical storage units with appropriate security restrictions or, in relation to personal information held electronically, password protecting computers and laptops and using secure portals for the transfer of documents.

As part of these security measures, you will be required to give proof of your identity before any personal information is disclosed to you.

### **Changes to this Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, regulatory or operational requirements. A link to the current Privacy Notice is available on the website at [https://www.mnopf.co.uk/privacy\\_notice.html](https://www.mnopf.co.uk/privacy_notice.html).

**Updated: 24 September 2025**