

Trustees of the Ulster Independent Clinic Pension & Life Assurance Scheme Privacy Notice

1: WHAT IS THE PURPOSE OF THIS DOCUMENT?

The Trustees of the Ulster Independent Clinic Pension & Life Assurance Scheme (“the Scheme”) are committed to protecting the privacy and security of your personal data.

This privacy notice describes how the Scheme collect and use the personal data you submit either directly or via your employer, the Ulster Independent Clinic Limited (“the Clinic”). The Scheme uses the personal data that is provided to it to administer and manage your pension and pay you or any person in respect of you the benefits provided by the Scheme.

2. WHO WE ARE AND GENERAL INFORMATION

CONTROLLER

The Trustees of the Ulster Independent Clinic Pension & Life Assurance Scheme are the “data controller” for any of the personal data held (collectively referred to as the “Scheme”, “we”, “us” or “our” in this privacy notice). This means that the Scheme are responsible for deciding how we hold and use personal information about you. The Scheme is required under data protection law to notify you of the information contained in this privacy notice.

CONTACT DETAILS If you have any questions about this privacy notice, or if you wish to exercise your legal rights or make a complaint about how we have handled your data, please contact the Nominated Trustee, Mrs Nicola McGregor, in one of the following ways:

Email: secretary@uic.org.uk.

Postal Address: The Nominated Trustee
Ulster Independent Clinic
245 Stranmillis Road
Belfast
BT9 5JH.

Telephone: 028 9066 1212.

You are required to raise any complaint or concern with the Scheme directly in the first instance, however, if you remain dissatisfied you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy notice under regular review. This version was last updated on 19 June 2026. We ensure that any updates to this privacy notice shall be notified to you and available through the Ulster Independent Clinic website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

3: DATA PROTECTION PRINCIPLES

We will comply with data protection law, which says that the personal data we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

4: THE KIND OF DATA WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been permanently removed (anonymous data).

- Your name, date of birth, National Insurance number, and employee ID.
- Bank account information if you are receiving a pension.
- Contact details, including your address, phone number and email address.
- Details about your salary and length of employment with the Clinic.
- Your marital status or living arrangements and other information the Scheme may need to pay any death benefits concerning you.
- If your benefits from the Scheme form part of a financial settlement (ordered as part of a divorce or dissolution of civil partnership) – details of that settlement.

5: HOW IS YOUR PERSONAL DATA COLLECTED?

The Scheme will use different methods to collect personal data from and about you, including through:

- **Direct interactions** – primarily we collect personal data about you directly from you, through your enrolment as a member of the Scheme.
- **Third parties** – we shall receive personal data from the following third-party sources: your employer and HMRC.

6: HOW WE WILL USE YOUR PERSONAL DATA

We process the personal data that you provide to us for the purpose of administering and managing your pension and paying you and/or your spouse any dependants benefits. We therefore process your personal data on the legal basis that either the processing is necessary:

- for the performance of the contract of employment between you and Ulster Independent Clinic Limited regarding your participation in the Scheme;
- to comply with our legal obligations; or
- further to our legitimate interests as trustees of the Scheme.

If you do not provide us with the personal data that we specify is required for administration of the Scheme, then we may not be able to administer the benefits provided by it.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify

you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DO WE NEED YOUR CONSENT?

We do not need your consent if we use your personal data in accordance with our written policy to carry out our contractual or legal obligations and where we have a lawful basis to do so as identified above. Should we require your consent to process your personal data, we will provide you with full details of the data that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

6: DATA SHARING

We may have to share your data with third parties, including other data controllers and third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law. If we do, you can expect a similar degree of protection in respect of your personal data.

We will transfer your data to Ulster Independent Clinic Limited, their advisers, the Scheme's advisers, service providers and partner organisations to the extent that it is necessary for the management and administration of the benefits provided by the Scheme. Some of the Scheme's advisers, in particular the Scheme actuary, Scheme's legal adviser and the Scheme auditor will be data controllers in their own right in respect of the data we share with them. If you would like further details of those advisers and how they use your personal data, please contact the Nominated Trustee at the address listed above.

We may also disclose your information to third parties in order to operate, administer and audit the Scheme responsibly, in the event that Ulster Independent Clinic Limited sells its business or assets (in which case we may disclose your personal data to the prospective buyer), in the event that we decide to de-risk or insure any of the benefits provided by the Scheme (in which case we may disclose your personal data to the prospective insurer) or where we are under a duty to disclose your personal data in order to comply with any legal obligation or to protect the rights, property, or safety of the Trustees, the members of the Scheme, or others.

We do not use your data for marketing or transfer personal data to other organisations for the purpose of marketing their goods or services.

7: TRANSFERS OF PERSONAL DATA OUTSIDE THE UK

Your personal data may be processed outside of the UK where required in order for the Scheme or the Clinic to provide benefits to or in respect of you. In each instance, we have ensured that the processing of your personal data outside the UK is protected in the same way as if it was being processed in the UK by using one of the following safeguards:

MEASURES WE TAKE

- Whenever we transfer your personal data outside of the United Kingdom, we ensure a similar degree of protection is afforded by ensuring at least one of the following standards is implemented: we only transfer your personal data to countries that have been deemed

to provide an adequate level of protection for personal data (which includes EEA countries and New Zealand); or

- where we use service providers, we use specific contracts approved for use in the United Kingdom which give personal data the same protection or ensure they have entered such contracts with their sub-processors.

Please contact the Nominated Trustee if you want further information on the specific mechanism used by us when transferring your personal data outside the United Kingdom.

8: DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9: DATA RETENTION

We will keep your personal data stored on our systems for as long as it takes us to provide the pension and other benefits provided under the rules of the Scheme. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our rights. We review our data retention policies regularly and will retain your personal data only as long as necessary for the purpose for which we process that data. As a general rule, your personal data will be retained for as long as the Scheme continues and for 15 years following its winding-up.

10: RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed of any changes to your personal data.

YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Under such laws, you have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below). Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you (if applicable) at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Nominated Trustee.

WITHDRAWING CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Nominated Trustee. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

COMPLAINTS

As stated above, if you are unhappy with the way in which your personal data is being processed you have a right to complain to us in the first instance. You can do this by contacting the Nominated Trustee at: secretary@uic.org.uk.

If you remain dissatisfied following the conclusion of our complaints process, you have the right to lodge a complaint with the Information Commissioner's Office. You can report your concerns through their website at <https://ico.org.uk/concerns>.