

SAMWORTH BROTHERS LIMITED SUPERANNUATION SCHEME

DETAILED DATA PRIVACY NOTICE

Who are we?

We, Samworth Brothers Superannuation Scheme Trustee Limited, are the Trustee of the Samworth Brothers Limited Superannuation Scheme (the **Trustee, we** or **us**). We collect, hold and use personal information to help us run the Samworth Brothers Limited Superannuation Scheme (the **Scheme**).

Why are we writing to you?

The Trustee is the data controller in respect of the personal information that we hold in relation to the Scheme. Because we use your personal information, under the UK's data protection laws we have to provide you with certain information.

This notice contains information on:

- the personal information we collect about you, what we do with this information and why we hold it. This is explained in more detail in section one (see page 2).
- who else we get personal information from and who else we share personal information with. This is explained in more detail in section two (see page 5).
- what rights you have in relation to your personal information and who to contact if you have any problems. This is set out in section three (see page 7).

We have set out additional information on how and why we process your personal information (see page 8), your rights under the Data Protection Act 2018 (see page 10), third parties with whom we share your personal information (see page 13) and an explanation of the key terms and phrases that are used in this notice (see page 14).

Where can I get more information?

This notice is at: [privacy notice](#). We also provide printed versions (including large print versions) on request.



We may change this notice from time to time. Please visit this webpage or contact us in order to receive the most up to date version of this notice. Our contact details are set out in section three of this notice (see page 7).



It is important that you read this notice (and any other privacy information that we send to you) so that you are aware of how and why we are using your personal information.

SECTION ONE

ABOUT YOUR PERSONAL INFORMATION

What information do we collect and process?

We collect and process your personal information because you are a member or connected to a member of the Scheme. We also collect personal information if you contact us in connection with your membership of the Scheme.

We collect and process the following categories of personal information about you:

- **personal contact details** – names, titles, addresses, telephone numbers and email addresses;
- **information about you** – dates of birth, gender, marital status, dependents and next of kin;
- **payroll information** – National Insurance numbers, payroll numbers, bank account details, tax status, salary and employment information; and
- **pension benefits** – information about the pension benefits that you have accrued, investment choices and death benefit nomination forms.

What sensitive personal information do we collect and process?

We usually only ask for sensitive personal information when it is required to help us make a decision in relation to your rights under the Scheme. For example, we may request:

- health information / medical records – we may ask you to provide health information if you request payment of a benefit that can only be paid if you meet certain medical criteria (e.g. ill health early retirement benefits). In addition to receiving this information from you, we may receive medical information from third parties such as your doctor or a third party occupational health provider; or
- other sensitive personal information – we may ask you to provide other sensitive personal information (e.g. information about your relationships) if it is relevant to help us decide on an internal dispute resolution procedure.

In addition, certain categories of sensitive personal information (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Scheme (e.g. birth certificates, marriage certificates, driving licenses and passports). You may also decide to provide us with sensitive information voluntarily (e.g. when raising queries or making a complaint).

How do we collect your personal information?

When you joined the Scheme, we asked you to and your employer to provide personal details so that we could create your membership record.

This information is updated whilst you are a member of the Scheme. Updated information may come from:

- you (e.g. if you get in touch to let us know a new address);
- your employer (e.g. updated salary and payroll information); and
- other third parties (e.g. if you contact the Scheme's administrator to update your personal information or if HMRC provides us with information so that we can deduct the correct level of tax).

In addition, we may request additional information in certain circumstances (e.g. if you request to transfer your benefits to another pension scheme, if you apply for ill health benefits or when you ask for your benefits to start being paid).

Why do we process your personal information?

We use this information to:

- set up your membership record for the Scheme;
- manage your membership of the Scheme;
- send you information that is relevant to your membership of the Scheme;
- calculate and pay any benefits that you are entitled to;
- comply with our legal and regulatory duties;
- help manage risks and liabilities in the Scheme;
- help the Scheme's sponsoring employers comply with their legal and regulatory duties; and
- communicate with members with information about the Scheme.

What are our legal grounds for processing your personal information?

In order to comply with our legal obligations

As the Trustee of the Scheme, we are under legal obligations to process your personal information in order to comply with pensions and tax legislation and regulation and trust law. For example:

- legislation sets out certain things that trustees must do (e.g. sending certain information to the Scheme's members); and
- the Trustee is subject to fiduciary duties under trust law to act in line with the Scheme's governing documentation and to act best interests of the Scheme's beneficiaries.

It is necessary for us to process your personal information in order to comply with these legal obligations.

In order to fulfil our legitimate interests

Processing your personal information is also legal if it is based on our 'legitimate interests'. The Trustee has a legitimate interest in running and managing the Scheme. In addition, certain third parties may have legitimate interests which require the processing of your personal information (e.g. your employer may need information in order to comply with regulatory requirements).

In order to rely on this legal ground, we have:

- considered the impact the processing has on your interests and rights; and
- implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

What are our legal grounds for processing your sensitive personal information?

There are three legal grounds that allow us to process your sensitive personal information:

- when we obtain **explicit consent** from you (e.g. when you sign one of the Scheme's consent forms);
- when processing is **necessary** for carrying out obligations under employment, social security or social protection law. This includes obligations under pensions law; and

- when processing is **necessary** for reasons of substantial public interest (which, under the Data Protection Act 2018, applies to certain processing by trustees of occupational pension schemes when making decision about benefits).

What would happen if we did not collect and process your personal information?

If we did not collect and process your personal information then:

- we would not be able to manage or administer the Scheme;
- we would not be able to pay you the benefits that you are entitled to under the Scheme; and
- we could be in breach of our legal and regulatory duties.

How long do we keep your personal information for?

The Scheme was set up to provide benefits over a very long time. The Trustee needs to maintain records in order to properly run the Scheme, to determine who should receive what level of benefits and when they should receive them and to respond to any disputes about an individual's rights under the Scheme.

As a result, the Trustee will generally keep your personal information for the lifetime of the Scheme plus 15 years (the longest period of time that someone can bring a claim against the Scheme). Our service providers (and former service providers) may also have similar valid grounds to keep your personal information for such long periods.

SECTION TWO

USING AND SHARING YOUR PERSONAL INFORMATION

How do we keep your personal information secure?

We use a range of measures to safeguard your personal information, in line with the requirements set out in the Data Protection Legislation. These apply to both paper and electronic records. We also require our third party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal information.

What do we do with any personal information that is provided by third parties?

We receive personal information from sources other than directly from you. This includes information shared by your employer, the Scheme's administrator, its professional advisers, service providers and other relevant third parties.

When we receive this information, we add it to the information we already hold about you in order to help us make sure that your details are as up to date and accurate as possible and so that we can manage your membership of the Scheme.

Who do we share your personal information with?

For the purposes of administering the Scheme and paying benefits under it, the Trustee may need to share your personal information with third parties. This may include your employer (e.g. the payroll and HR teams). It may also include third parties who provide advice or services to the Trustee. These may include actuaries, administrators, auditors, insurers, prospective insurers, lawyers, medical advisers, and any other such third parties as may be necessary for the operation of the Scheme.

We've set out a list of the third parties with whom we share your personal information together with links to their data protection and privacy information (see page 13).

Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers also act as data controllers in respect of your personal information. We've included links to their online privacy information if you want to find out more about how they process your personal information.

The Scheme Actuary acts as a data controller and uses your personal data to advise the Trustee on the financial management of the Scheme. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension scheme members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. This may include passing information to The Pensions Regulator or HM Revenue and Customs.

We may also share your personal data with the Scheme's employers to enable them to carry out activities in their legitimate interests (this is usually in connection with managing their business from a regulatory, HR or finance perspective).

SECTION THREE

YOUR RIGHTS AND WHO TO CONTACT

What rights do you have in respect of your personal information?

In certain circumstances, you have the following rights in respect of your personal information:

- the right to **object** to us processing your personal information;
- the right to request **access** to personal information relating to you;
- the right to request that we **correct any mistakes** in your personal information;
- rights in relation to **automated decision making**;
- the right to request to **restrict or prevent processing** of your personal information;
- the right to request to have your personal information **transferred** to another data controller (e.g. if you decide to transfer your pension benefits to another pension scheme); and
- the right to request to have your personal information **deleted**.

We've set out more information about these rights in part two of the additional information starting on page 10.

How will we respond to your request?

We will usually respond to any request that you make within a month of receiving your request. If your request is particularly complex, we will let you know that we've received your request and let you know when we aim to respond. You can find out more about your rights under the UK's data protection laws at www.ico.org.uk.

Under the UK's data protection legislation there are exemptions which mean that, in certain circumstances, we may continue to store, process or transfer your data (for example where we need to comply with a legal requirement or have a legally valid legitimate interest in doing so) even if you ask us not to.

What should you do if you have any questions or complaints?

You may be entitled to compensation for damage caused by breach of the Data Protection Legislation. If you do not think that we have processed your data in accordance with this notice, please contact us in the first instance (see 'How to contact us' below). If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at www.ico.org.uk/concerns or by calling their helpline on 0303 123 1113.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you. If you wish to contact us, please send an email to SamworthAdmin@lcp.uk.com or write to us at:

Samworth Brothers Limited
Superannuation Scheme,
Lane Clark & Peacock LLP
95 Wigmore Street, London, W1U 1DQ

Alternatively, you can call the Scheme's helpline on 020 3922 1320.

FURTHER INFORMATION – PART ONE

MORE ABOUT HOW AND WHY WE PROCESS YOUR PERSONAL INFORMATION

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
Addresses	We use this information so that we can send you information that we are legally required to provide you with. In addition, we use this information to get in touch with you when we need to in order to run the Scheme. Finally, we use this information to send you information that we think will be relevant to you as a member of the Scheme.	We have a legal obligation to send certain information to members of the Scheme. In addition, we may send additional information to fulfil our legitimate interest of running the Scheme.	You provided this information when you filled in a membership application form to join the Scheme. Your employer may share updated information if you update your records with HR. In addition, you may have updated your information by contacting us or the Scheme's administrator.
Telephone numbers			
Email addresses			
Names and titles	We use this information to identify you and to create and update your membership record in the Scheme.	We have a legal obligation to pay the correct level of benefits to the correct individuals. This requires us to obtain and update this information. We also have a legal obligation to properly identify individuals who receive or may receive benefits from the Scheme.	If a member's details are not kept up to date, we may lose contact with that member. In these cases, we may use a third party tracing agent to obtain up to date contact information.
Dates of birth			
Gender			
Marital status			
Dependants			
Next of kin			
National Insurance numbers	We use this information to identify you and to create and update your membership record in the Scheme. Your National Insurance number is also needed so that we can receive the correct information from HMRC and so that we can deduct the correct level of tax from your benefits.	The Trustee is also required to comply with tax legislation and deduct the correct level of tax from benefits.	The Scheme's administrators create a unique reference number so that your records can be easily identified.
Employment start date			
Payroll number			
Scheme reference number			
Bank account details	We use this information in order to pay your benefits under the Scheme directly to you.	Processing this information also fulfils the Trustee's legitimate interests in running and managing the Scheme.	Your bank details provided by you when you fill in your retirement forms and when you update your details.
Tax status	We use this information to deduct the correct level of tax from your benefits.	Processing this information also fulfils the Trustee's legitimate interests in running and managing the Scheme.	Your tax status is provided to us by your employer and/or HMRC.
Salary details	We use this information to calculate the correct level of your benefits under the Scheme.		Your salary details are provided to us by your employer.

<p>Details about your entitlement to pension benefits under the Scheme</p>	<p>We use this information to calculate the correct level of your benefits under the Scheme.</p>	<p>See the section immediately preceding.</p>	<p>Details about your entitlement to pension benefits under the Scheme may be provided by your employer or may be determined by reference to the Scheme's governing documentation. In addition, the Scheme's actuary and administrators will carry out calculations, the results of which will be added to your record.</p>
<p>Investment choices</p>	<p>We use this information to ensure that your additional voluntary contributions and/or money purchase benefits are invested in the correct investment fund.</p>	<p>We have a legal obligation to ensure that the Scheme is run properly and in line with its governing documents. There is also specific legislation that governs payment of contributions into money purchase investment funds.</p>	<p>We (or our third party providers) give you with information about the investment options that are available to you. You then provide us with your choices and any changes to your investment choices.</p>
<p>Death benefit nomination forms</p>	<p>We use this information as part of our decision making process when deciding who will receive death benefits.</p>	<p>As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.</p>	<p>You provide us with the information that is contained on our death benefit nomination forms.</p>
<p>Medical information (including medical records and doctors' opinions)</p>	<p>We use this information as part of our decision making process when deciding ill health benefits under the Scheme.</p>		<p>Medical information relating to you may be provided directly by you, by your doctor or by a third party providing health assessments / reports.</p>
<p>Information about your relationships</p>	<p>This information is used to determine who is entitled to benefits in relation to your membership of the Scheme.</p>		<p>This information is usually provided by you. In certain circumstances, we may also need to obtain information from relevant third parties.</p>
<p>Certified copies of official documents, including:</p> <ul style="list-style-type: none"> • passport; • driving license; • birth certificate; • marriage certificate; • death certificate; and • decrees nisi / absolute. 	<p>This information is used to:</p> <ul style="list-style-type: none"> • identify you; • determine the status of your relationship; • determine who may be entitled to benefits under the Scheme; and • trigger certain processes in respect of your benefits under the Scheme (e.g. payment of death benefits or splitting of benefits in cases of divorce). 	<p>As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time. Certified copies of official documentation are sometimes essential for the Trustee to make legally valid decisions.</p>	<p>This information is usually provided directly by you or from your next of kin. In more unusual cases (e.g. when we are having difficulty locating a member or identifying their next of kin) publicly available official documentation may be obtained by a third party tracing agent.</p>

FURTHER INFORMATION – PART TWO

MORE ABOUT YOUR RIGHTS UNDER DATA PROTECTION LEGISLATION

As a data subject, you have a range of rights under the Data Protection Legislation. These rights are explained in more detail below. If you have any comments, concerns or complaints about our use of your personal information, please contact us directly.

You can email SamworthAdmin@lcp.uk.com or write to us at:

Samworth Brothers Limited
Superannuation Scheme,
Lane Clark & Peacock LLP
95 Wigmore Street, London, W1U 1DQ

Alternatively, you can call the Scheme's helpline on 020 3922 1320.

Right to object to our processing of your personal information

You may object to us processing your personal information where we are relying on a legitimate interest as our legal grounds for processing. Our legal grounds for processing are set out in part one of the further information (see page 8).

If you have the right to object to processing (i.e. for personal information that we process in order to fulfil our legitimate interests or the legitimate interests of a third party) **and** you exercise this right we will no longer be able to process your personal information **unless** we can demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in part one of the further information (see page 8).



The key point to note is that, if we cannot continue to process your personal information, we would be unable to ensure that we are providing the correct level of benefits in respect of your membership of the Scheme. As we are legally required to pay the correct level of benefits to the right people at the right time, in these circumstances we may have to delay or even stop payments / requests until we have sufficient information.

Right to access personal data relating to you

You can ask us to confirm whether we are processing your personal information. If we are, you may ask us to provide the following:

- a copy of your personal information (please note that, if you want more than one copy of your personal information, we reserve the right to charge a reasonable fee based on our administrative costs for the provision of such further copies);
- details of the purpose for which your personal information is being, or is to be, processed;
- details of the recipients or classes of recipients to whom your personal information is, or might be, disclosed, including, if the recipient is based in a country outside of the European Union, what protections are in place in relation to the transfer to that recipient;
- the period for which your personal information is held (or the criteria we use to determine how long it is held);

- any information available about where we obtained your personal information; and
- confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

Requests for your personal information must be made to us in writing (see 'How can you contact us?' page 7). A copy of your request will be kept on your membership record. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person if possible.

There are certain types of information which we are not obliged to disclose to you, which include personal information which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

Right to correct any mistakes in your information

You can require us to correct any mistakes (including adding missing information) in any of the personal information concerning you which we hold. Please contact us using the contact details set out at the beginning of this section.

Rights in relation to automated decision taking/making

The Trustee does not generally use automated decision making or profiling.

Automated decision making occurs when decisions are taken solely on automated processes. Under the Data Protection Legislation, you have the right to ask that, if you are being evaluated (for example, when a bank carried out credit checks before making decisions on issuing loans or credit cards), any decisions are not solely based on automated processes and to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example where the decision is authorised or required by law and steps have been taken to safeguard your interests.

Right to request that we restrict the processing of your personal information

You may request that we restrict the processing of your personal information in any of the following circumstances:

- where you do not think that your personal information is accurate. In this case we will start processing again once we have checked whether or not your personal information is accurate;
- where the processing is unlawful, but you do not want us to erase your information;
- where we no longer need the personal information for the purposes of our processing, but you need the information to establish, exercise or defend legal claims; or
- where you have objected to processing because you believe that your interests should override our legitimate interests. In this case we will start processing again once we have checked whether or not our legitimate interests override your interests.

If our processing is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

Right to request that we delete your personal information

You can ask us to delete your personal information where your personal information is being processed on a legal ground other than for complying with a legal obligation and:

- you believe that we no longer need to process it for the purposes set out in this privacy notice;
- you had given us consent to process it, but you withdraw that consent and there is no other legal ground upon which we can process it;
- you have successfully objected to our processing it; or
- it has been processed unlawfully or has not been erased when it should have been.

Right to request transfer of your personal information

You may, in specified circumstances, ask a data controller to provide you with an electronic copy of personal information that you have provided to it, or to have such a copy transmitted directly to another data controller.

Those circumstances do not, however, generally apply in relation our processing of your personal information in connection with the Scheme. This is because:

- our legal grounds for processing will not normally be that you have consented to the processing; and
- we do not carry out processing by automated means.

Right to withdraw consent

We usually only request your consent when we ask you for sensitive personal data. You have the right to withdraw any consent you have given us at any point.

However, as highlighted above, the Trustee only requests sensitive personal data that is required to make decisions in respect of specific member benefits or complaints. If you withdraw your consent for us to process this information, we may have to delay or even stop payments / requests until we have sufficient information.

What will happen if your rights are breached?

You may be entitled to compensation for damage caused by breach of the Data Protection Legislation. If you do not think that we have processed your information in accordance with this notice, please contact us in the first instance.

If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at www.ico.org.uk/concerns or by calling their helpline on 0303 123 1113.

FURTHER INFORMATION – PART THREE

THIRD PARTIES AND TRANSFERS

For the purposes of administering the Scheme and paying benefits under it, the Trustee may need to share your personal information with certain third parties. This section lists the key third parties with whom we share your personal information together with links to their data protection and privacy statements.

ROLE	THIRD PARTY	WHY DO WE NEED TO SHARE YOUR INFORMATION?	DATA PROTECTION AND PRIVACY INFORMATION
Actuary	Lane Clark & Peacock LLP	The Scheme's actuary may be required to provide advice in relation to a member's entitlement to benefits. In order to provide this advice, we may need to share certain personal information from the Scheme's records.	Click here
Administrator	Lane Clark & Peacock LLP	The Scheme's administrator is responsible for the day to day operation of the Scheme. In order to do this, they need access to the Scheme's personal information. They are also responsible for updating the Scheme's records when members get in touch	Click here
Legal advisers	Gowling WLG LLP	From time to time, the Trustee needs to obtain legal advice in relation to members. If personal information is relevant to the legal issue, the Trustee will share this with its lawyers as part of its instructions.	Click here
Auditors	Deloitte LLP	The Scheme's auditors carry out an annual audit of the Trustee's annual report and accounts and may be provided with personal data to enable them to carry out their professional duties as part of the annual audit process.	Click here
Medical Practitioner	Medigold Health	The Scheme's Independent Medical Practitioner will review applications for retirement on the grounds of ill health.	Click here
Overseas payment provider	Convera UK Financial Limited	Convera will make pension payments to members who are located overseas and have chosen to have their pension paid into an overseas bank account.	Click here
Company appointed Independent Financial Advisor	Origen Financial Services Limited	Origen have been appointed by Samworth Brothers Limited to provide financial advice to certain members of the Scheme.	Click here

Transfers of your personal information out of the EU

Your information may be transferred out of the European Union. Our service providers have confirmed that they either:

- do not transfer the Scheme's data outside of the European Union; or
- do or may transfer the Scheme's data outside of the European Union, but only when certain protections that are approved by the European Commission are applied. These protections aim to ensure the security of your personal information, safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms.

FURTHER INFORMATION – PART FOUR

KEY TERMS AND PHRASES

Data controller	means the natural or legal person or other body who, alone or jointly with others, determines the purposes and means of the processing of personal data. This means that the data controller exercises overall control over the 'why' and 'how' of a data processing activity.
Data Protection Act 2018	is the legislation that currently applies to the processing of personal data in the UK.
Data Protection Legislation	means the Data Protection Act 2018 and the General Data Protection Regulation, together with regulatory guidance issued by the European Commission (via the Article 29 Working Party) and the Information Commissioner's Office.
Data protection principles	<p>means the principles that are set out in the Data Protection Legislation relating to the processing of personal data.</p> <ul style="list-style-type: none">• lawfulness, fairness and transparency;• purpose limitation;• data minimisation;• accuracy;• storage limitation; and• integrity and confidentiality. <p>In addition, there is an overarching principle of accountability.</p>
Data processor	means a natural or legal person or other body who processes personal data on behalf of the data controller.
Data subject	means the identified or identifiable living individual to whom personal data relates.
General Data Protection Regulation (GDPR)	is the primary EU legislation that, on and from 25 May 2018, applies to the processing of personal data in all member states of the EU.
Information Commissioner's Office (ICO)	is the UK's national data protection authority. It is a public body that is charged with regulating information rights, public sector transparency and individual's privacy in the UK.
Personal data or Personal information	means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number etc.
Privacy notice	means the information that is provided to inform individuals about what you do with personal data. Under the Data Protection Legislation, data controllers must provide accessible information to individuals about the use of their personal data.

Processing

means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special categories of personal data

(also referred to as sensitive personal data)

means:

- personal data that is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership;
- the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person;
- data concerning health; or
- data concerning a natural person's sexual orientation.