

The Trustees of the Scheme jointly carry the responsibility for the lawful processing of personal data, which is data relating to a living individual who can be identified from that data, and this brings with it duties and obligations which must be satisfied. The trustees must ensure that:

- all of their number have appropriate and up-to-date knowledge of the requirements of data protection legislation, and that training is provided where deficiencies are identified;
- they are able to deal with requests from data subjects (those individuals whose personal data the trustees process or direct the processing of) in accordance with the **Data Subject Rights Policy**;
- they keep under review their processes and the data they process, in line with an agreed schedule, and make appropriate changes; and
- they review and keep under review all contracts with third parties to ensure they comply with data protection legislation and adequately protect personal data.

General Guidelines

The Trustees will:

- ensure that they have, and continue to have, a lawful basis on which they process personal data in relation to the Scheme;
- provide through privacy notices details of the data held, how they will use the data, the data subjects rights, retention period information, and any other information required by the data protection legislation – in a clear, transparent, plain English format which will be accessible and free of charge;
- routinely use encryption and passwords to secure documents and communications, and will not share data informally;
- ensure that data stored in electronic format is, stored only on designated, approved systems, is backed up frequently and where stored on removable media is locked away when not being used;
- regularly review personal data processed for accuracy, and update it where it is out of date and delete it in accordance with the **Data Retention Policy**;
- ensure that only they and individuals authorised by them will process personal data, and all such processing will be approved and confirmed as lawful in connection with the Scheme;
- ensure that paper documents containing personal data are stored securely when not being used, not left where unauthorised people may see them and securely disposed of when no longer required in accordance with the **Data Destruction Policy**;
- ensure that a data subject is advised of any breach involving their data and or inform the ICO in both case if required, in keeping with **Data Breach Management and Reporting Policy**;
- ensure that minimum copies of data are stored, avoiding duplication;
- ensure that computers are 'locked' when left unattended;
- obtain written confirmation from all third parties that they deal with in relation to the Scheme that they have a cyber security policy and are GDPR compliant, specifically addressing Article 28; and
- ensure they have in place detailed policies which will underpin these general guidelines covering their core data protection responsibilities as outlined in the GDPR and the Data Protection Act 2018 including but not necessarily limited to those listed in the Record Keeping section below.

Dealings with Third Parties

It is the Trustees' policy to communicate with all data subjects the reason for holding their personal data and when and how third parties may be given access to the same.

Where third parties are engaged the trustees will:

- carry out proportional investigations to ensure such parties are GDPR compliant;
- ensure appropriate contractual provisions are in place in relation to GDPR compliance; and
- keep third party relationships and contracts under review.

Record Keeping

The trustees will keep records of privacy notices that have been issued and policies that they hold, and details can be found/obtained from: www.reevespensions.org

The trustees will keep and maintain GDPR compliant policies for:

- Data Retention
- Data Breach Management and Reporting
- Data Subject Rights
- Data Destruction
- A General Privacy Policy

Day-to-Day Activities

- All meeting packs shall be anonymised and not [unless expressly agreed in advance by the trustees] contain personal data;
- All electronic communications will be password protected, and passwords must be sufficiently strong to afford the appropriate level of protection, for example through the use of upper and lower case, numeric and special characters and being a minimum of 8 characters in length;
- Printed documents containing personal data shall not be removed from the employer's premises, and shall be stored securely when not being used;
- All data stored on removable storage (USB drives, CDs, etc.) will be password protected and will be securely stored when not being used;
- Personal data shall not be saved or stored on personal devices;
- Any paper records held by the trustees personally will be held in secure premises in lockable cabinets and can only be retained in accordance with the Retention Policy and must be destroyed in keeping with the **Data Destruction Policy**; and
- Any projects to be undertaken which involve processing of data will be subject to a Data Protection Impact Assessment and any identified data protection issues i.e. high risk to the rights of an individual(s) will be considered and steps taken to manage.

Data Protection Information

Although processing data of Scheme beneficiaries is a core activity for the Trustees, any such processing on a large scale is unlikely to involve regular and systematic monitoring of data subjects. If any regular and systematic monitoring of data subjects does take place in relation to the Scheme, this will probably be undertaken by third parties rather than the Trustees. Accordingly, the Trustees do not need to appoint a Data Protection Officer.

Consequently the Trustees have agreed that The Chair of the Trustee Board is to act as the first port of call in relation to any matters concerning data protection, this Privacy Policy and any of the policies mentioned herein. The current contact details are following:

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