

**THE ALLIANZ RETIREMENT AND DEATH BENEFITS FUND****PRIVACY NOTICE – PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR  
DEPENDANTS**

This notice is for all members of the Allianz Retirement and Death Benefits Fund (the “Fund”) from Allianz Pension Fund Trustees Ltd (the “Trustee”) and is for information only.

The current data protection laws are set out in the UK General Data Protection Regulations and the Data Protection Act 2018. These regulations require the Trustee to provide details of the information that we have about you and how this information is used. You should also share this notice with your family and dependants where you have provided us with personal information about them.

Personal information is broadly information, or a combination of pieces of information, that could reasonably allow you to be identified.

**1. Personal information we use**

As the Trustee of the Fund, we hold certain personal information (known as “personal data”) about Fund members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Fund will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustee is known as a “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

**1.1 What Information may we collect directly from you?**

The categories of personal information that we collect directly from you include:

- (a) personal details (for example, your name, gender, age, date of birth);
- (b) your bank details and national insurance number;
- (c) your contact details (for example, your address, phone number and email address);
- (d) details about your health;
- (e) details about who you would like us to consider paying benefits to if you die; and
- (f) if you have paid additional voluntary contributions on a money purchase basis, your choice of fund for investing your contributions.

Where we obtain information concerning certain “special categories” of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by data protection legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing, using the contact details in Section 7 below. However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information needed to make decisions based on it, including decisions regarding the payment of your benefits.

## **1.2 What information may we collect from other sources (such as your employer)?**

These are examples of categories of information we may collect from other sources:

- (a) personal details (for example, your name, date of birth, marital status);
- (b) your contact details (for example, your address, phone number and email address);
- (c) information necessary to calculate and pay your benefits (for example, your employment history and salary); and
- (d) information from HMRC (for example your tax code).

## **1.3 How will we use your personal information and why?**

We may use your information to deal with all matters relating to the Fund, including its administration and management. The ways we use your information include:

- (a) identifying you and your dependants and making sure your details are up to date;
- (b) communicating with you;
- (c) calculating and paying your benefits and deducting appropriate tax; and
- (d) making Trustee decisions – such as how to distribute benefits after your death.

We must have a legal reason to use your personal information. This will usually be one of the following:

- (a) to fulfil our legal obligations (including any contractual obligations), which includes making sure that your benefits are paid correctly;
- (b) to meet our legitimate interests to administer the Fund efficiently and provide benefits for you and your dependants;
- (c) because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health, we will need to seek your prior consent to process your data. Where this applies, you may take back your consent at any time by contacting the Fund administrators (Aon) at: [allianz.pensions@aon.com](mailto:allianz.pensions@aon.com)

## **2. Information sharing**

### **2.1 We may share personal information with:**

- (a) the Fund's administrators and our advisers (such as the Fund actuary, our auditors, our consultants and secretarial support and our legal advisers) to facilitate the administration of the Fund and payment of your benefits.
- (b) His Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund; and
- (c) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes.

### **2.2 We may also provide some of your personal information to Allianz to help it to make decisions relevant to its role as sponsoring employer of the Fund. This might include date of birth, gender and salary history and other personal information as set out in section 1.1 and 1.2. We will only do so to the extent we consider necessary for these purposes.**

### **2.3 In some instances, advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example, via their websites.**

## **3. Security and storage**

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

We will keep your personal information for as long as we have a relationship with you or your dependants, i.e. for as long as is necessary to provide benefits to you or your dependants. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

#### **4. Your rights**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our processing of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us using the details in Section 7.

The personal data we hold about you is used to administer your Fund benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information or ask that the personal data we already hold is deleted or restricted, this may affect the payment of benefits from the Fund. In some cases, it could mean the Trustee is unable to put your pension into payment or has to stop your pension (if already in payment).

#### **5. International data transfer**

While the data that we collect from you will normally be stored inside the UK, your personal data may be transferred, stored and processed outside of the UK where required in order for us or Allianz to provide benefits to or in respect of you. In each instance, appropriate safeguards are put in place to ensure that your data is kept secure and in accordance with this privacy notice.

These transfers will be governed by the data protection legislation. We may transfer your data outside of the UK to a country which the UK government considers ensures an adequate level of protection of personal data. These "adequacy regulations" currently apply to a number of countries, including countries within the European Economic Area. If there are no adequacy regulations in place, we may only transfer your data if there are adequate safeguards and if you would have enforceable legal rights and effective legal remedies in respect of your data. For more information on any safeguards in place, please contact us using the details in Section 7.

#### **6. Changes to this policy**

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. We will normally inform you in the Fund's Annual Newsletter communication if any updates have been made, but you can access the current privacy notice at: <https://pensioninformation.aon.com/allianz>

#### **7. How to contact us**

- 7.1 The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns, please contact Aon, the Fund's administrator using the details below: Please remember to include your member reference number in all communication.

Aon Solutions UK Ltd  
Allianz Retirement and Death Benefits Fund  
PO Box 196  
Huddersfield  
HD8 1EG  
[Allianz.pensions@aon.com](mailto:Allianz.pensions@aon.com)

- 7.2 Alternatively, you can contact the Fund's Data Protection Officer, David Edmunds:
- Allianz Pension Fund Trustees Ltd  
57 Ladymead  
Guildford  
Surrey  
GU1 1DB
- 7.3 You also have the right to complain about data protection matters to the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO at [www.ico.org.uk](http://www.ico.org.uk) and the ICO can be contacted by calling 0303 123 1113.
- 7.4 We encourage you to let us know if your personal information changes or if you think that the information we hold about you is out of date.

July 2023

**APPENDIX****AON SOLUTIONS UK LTD**

Aon Solutions UK Limited (and, where appointed, the scheme actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the Fund. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age or benefits) in order to be able to provide these services. The purposes for which we use personal information will include management of the Fund and your membership within it, funding the benefits (i.e. helping to ensure that the assets within the Fund are sufficient to cover the benefits of members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the Fund), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as the Fund Actuary (where this is not Aon), your financial advisor, benefits providers, insurers, our affiliates and service providers in the course of running the Fund and administering your benefits. We may also pass your personal information to certain regulatory bodies where legally required to do so.

Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at

<https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>

or you can request a copy by contacting contact us, including reference to the Fund name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

**AVIVA**

The Trustee has secured a bulk purchase annuity policy with Aviva Life & Pensions UK Limited ('Aviva'). A link to Aviva's Bulk Purchase Annuity Data Privacy Notice is given below.

<https://www.aviva.co.uk/adviser/documents/view/sp07075c.pdf>