



EE Pension Trustee Limited
Capricorn
2620, The Quadrant
Aztec West
Almondsbury
Bristol
BS32 4A

EE Pension Scheme Personal information and what we do with it

The Trustee of the Scheme needs personal information about you to run the Scheme and pay benefits. Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustee about how your personal information will be used for those purposes. These other party (our '**Trustee Adviser**') includes the Scheme Actuary currently Simon Head of Aon Hewitt Ltd. Details of how Aon Hewitt Limited use your personal data in order to support us in the running of the scheme is detailed in the Appendix.

In legal terms, the Trustee and the Trustee Advisers are 'joint data controllers' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what the Trustee does with your personal information, and also what the Trustee Advisers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information. Except where stated otherwise, 'we' means both the Trustee and the Trustee Advisers where they are acting as joint data controllers in relation to your personal information.

What personal information we have

We normally hold some or all the following types of personal information:

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment).
- Contact details (including your address, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

Where we get personal information from

Some of the information the Trustee has comes directly from you. In addition, Zurich and Capita, who administer the Scheme on behalf of the Trustee, may have obtained information from you and passed it

Registered Office
Trident Place
Mosquito Way
Hatfield
Hertfordshire
AL10 9BW

Registered in England No. 03911403

to the Trustee. The Trustee may then in turn pass information about you to the Trustee Advisers or may instruct the administrator to do so. The Trustee is the source of the personal information which the Trustee Advisers have about you.

Sometimes the Trustee gets information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if the Trustee has lost touch with you and is trying to find you. The Trustee may in turn pass this to the Trustee Advisers (as above).

If the Trustee asks you for other information in the future (for example, about your health), it will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Why we hold personal information and how we share it

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

The Trustee will use your personal information to comply with these legal obligations, to establish and defend its legal rights, and to prevent and detect crimes such as fraud. The Trustee may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

The Trustee also has a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

In order to achieve this, the Trustee may share your personal information with various people, including: any new trustees or trustee directors; the Scheme employers; the Trustee Advisers; the Trustee's other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman and IT and data storage providers and other service providers. If your benefits are transferred to another scheme, the Trustee will also need to provide the administrators of that scheme with information about you.

When the Trustee needs to use information about your health (or other very personal information), it will ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustee to use this information without consent, and it will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time. This may affect what the Trustee can do for you, unless it has another lawful reason for using your information.

The Trustee may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustee may share your personal information with the employers so that they can contact you for that purpose.

The Trustee Adviser may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as data controller in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

Registered Office
Trident Place
Mosquito Way
Hatfield
Hertfordshire
AL10 9BW

Registered in England No. 03911403

How long we keep your personal information for

We need to keep your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

The Trustee needs to keep your personal information for long enough to make sure that it has enough information to:

- pay any benefits due to or in respect of you;
- answer any queries you (or others acting on your behalf) may have about your benefits;
- respond to any complaints or other claims; and
- satisfy our legal obligations in relation to the Scheme.

To meet this aim, the personal information that we hold will be kept for as long we sensibly think we need it to deal with queries from you or your beneficiaries/other persons who might ask us if they are entitled to payments, complaints (from you or them) and our legal obligations mentioned above. We will not keep your information for longer than is necessary.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use Trustee's contact details, which are set out below. The Trustee can also supply more information about these rights to you, on request.

The Trustee has agreed with the Trustee Adviser that the Trustee will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise rights against the Trustee and the Trustee Adviser for what they do jointly with your personal information, you should contact the Trustee.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Registered Office
Trident Place
Mosquito Way
Hatfield
Hertfordshire
AL10 9BW

Registered in England No. 03911403

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact Iain Currie on behalf of the Trustee.

If you have concerns about the way we handle your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.

Iain Currie
Pensions Specialist
Iain.2.Currie@bt.com, 0331 624 0590
for EE Pension Trustee Ltd

Registered Office
Trident Place
Mosquito Way
Hatfield
Hertfordshire
AL10 9BW

Registered in England No. 03911403

Appendix

Aon Hewitt Limited "QUICK READ" Privacy Notice

Aon Hewitt Limited and the Scheme Actuary - together "Aon" - have been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. 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) in order to be able to provide these services.

The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the 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 pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and 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 <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting contact us, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

Registered Office
Trident Place
Mosquito Way
Hatfield
Hertfordshire
AL10 9BW

Registered in England No. 03911403