

JPMorgan CAZENOVE (1987) Pension Scheme



Privacy notice

JPMorgan Cazenove Pension Trustee Limited as Trustee of the JPMorgan Cazenove (1987) Pension Scheme is committed to protecting your information, and that of your potential beneficiaries, and acting in accordance with your rights under data protection law. The following notice sets out how the Trustee, acting as data controller, collects, processes and protects your data. If you have any queries regarding this notice or the Trustee's data privacy policies, please contact the number given in the contacts section below.

Our Scheme actuary (Aon Solutions UK Limited) also acts as a data controller for the Scheme. Further details on how Aon uses your personal data in order to support us in running the Scheme can be found at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>

Collection of your information

We collect, store and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, National Insurance number, bank account details (in some cases), payroll number, marital or partner status, dependants, nationality and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined and left the Scheme, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, investment details, pension adjustment orders, tax protections or other adjustments;
- records of communications with you (including any complaints); and
- in some cases, special categories of personal data such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependents or next of kin. Before providing us with any such information, you should consider providing a copy of the information in this notice to those individuals.

In some cases, this information is collected directly from your previous employer or from third parties providing certain services for the Scheme, such as tracing and mortality screen services. We may also collect data from the trustees or administrators of another pension arrangement where your benefits are transferred into the Scheme from that arrangement.

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other pension schemes;
- b) for the administration of the Scheme, including: to record and pay benefits; for actuarial valuations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud;
- c) for meeting our on-going regulatory and compliance obligations, including assisting with the investigation or prevention of crime;
- d) to improve the processes and use of technology adopted by the Trustee's service providers, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme;
- e) when we, or relevant JP Morgan Group companies undertake activities from time to time to help us manage the liabilities of the Scheme, including (where relevant) disclosures to JP Morgan Group companies or administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make the disclosures to the JP Morgan Group for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of the JP Morgan Group, such interests in each case not being overridden by your privacy interests, nor other fundamental rights and freedoms;
- (ii) required to meet our legal or regulatory responsibilities, in relation to the purposes set out in (a) to (e) above, and when we make the disclosures to authorities, regulators or government bodies referred to later in this notice;

(iii) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and

(iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the Scheme rules require you to provide information which we cannot otherwise process without your consent.

The Trustee will only process your personal data on a basis that is permitted under data protection law, including where required or permitted under applicable law or where the Trustee has obtained your consent (where required to do so under applicable law).

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record or pay your or your beneficiaries' benefits.

Disclosures of your information

We may share your information with the following recipients:

- our suppliers (current supplier list is on the back page), the JP Morgan Group and other providers of services to us and the JP Morgan Group, such as administrators, financial advisors (to provide you with financial advice in relation to the exercises described in e) above), payroll providers (to record and pay benefits), the scheme actuary (for actuarial calculations), legal advisers (to seek advice regarding the interpretation of the Scheme Rules and legislation as it pertains to your benefits and rights), auditors (to carry out the Trustee's statutory obligation for independent audit), AVC providers (in relation to legacy AVC policies), and printing, communication, IT and hosting, election management providers (for Member Nominated Director elections) and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);

- the JP Morgan Group, such as for audit purposes, in relation to corporate transactions initiated by the JP Morgan Group, and, where applicable, to allow you to flexibly access your benefits including exercising your pensions options;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) on the previous page;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information may involve transferring your information outside the UK or the European Economic Area. In particular, if you have service with JP Morgan Group Companies in locations outside the EEA, we may transfer your information within the JP Morgan Group to those locations in order to check your service record and thereby confirm your benefits. In addition, some of the actuarial calculations performed by Aon Solutions UK Limited, in its capacity as actuary to the Scheme, are carried out in India. In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) authority in the United Kingdom.

Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the periods envisaged within our records retention policy. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such

as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests. We will not keep your information longer than is necessary for these purposes.

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict or object to its processing and (in some circumstances) to require certain of your information to be transferred to you or a third party, which you can exercise by contacting us at the details set out below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent. You can exercise any of these rights by contacting:

JPMorgan Cazenove Pension Trustee Limited
Aon Solutions UK Limited
PO Box 196
Huddersfield
HD8 1EG

Telephone: 0333 207 9436

E-mail: cazenove.jp.morgan@aonhewitt.com

In addition, you can lodge a complaint about our processing of your personal information with a supervisory authority in the Member State where you habitually reside or work, or where a breach has taken place. Details for the office of the Information Commissioner in the UK are available at www.ico.org.uk.

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer, to retire early on grounds of ill-health, or receive certain lump sums or for payment of discretionary death benefits. We will notify you when your information is required for this purpose.



Status of this privacy notice

This privacy notice was updated in November 2024. It is non-contractual. We reserve the right to amend it from time to time. Any future changes or additions to the processing of personal data as described in this privacy notice which impact you will be communicated to you in advance through an appropriate channel, depending on how we normally communicate with you.

Michael Power (Chair of Trustee)

Contact: Neil Warren (Secretary to the Trustee,
25 Bank Street, London, E14 5JP)

Current supplier list

Administrator and pension payroll provider – Aon Solutions UK Limited

Actuarial consulting – Karen Butroid (Aon Solutions UK Limited)

Investment Consultant – Schroders Investment Solutions Limited

Scheme auditor – KPMG LLP

Trustee legal advisers – Linklaters LLP

AVC Providers – Legal & General Investment Management Limited
Standard Life Assurance Limited,
The Equitable Life Assurance Society