

## **Lockheed Martin UK Pension Plan – Privacy Notice**

### **Personal information and what we do with it**

As Trustees of the Plan, we need personal information about you to run the Plan and pay benefits. In legal terms, as we are a 'data controller' of this information, we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

#### **What personal information we have**

We hold the following types of personal information for data subjects, which include Pensioner Members, Deferred Members and beneficiaries:

- Your name, gender, date of birth, national insurance number and bank account information;
- Contact details (including your address, phone number and email address);
- Your employer when you were building up benefits in the Plan, 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 death benefits due in relation to you;
- If your benefits from the Plan form part of a divorce settlement, details of that settlement;
- Expression of Wish declarations
- Beneficiaries' details

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 Plan or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions where it is relevant to your entitlements under the Plan.

#### **Where we get personal information from**

Some of the information we have comes directly from you. We may also get information (such as your salary and length of service) directly from your employer. In addition, Aon Ltd and FIL Investment Management Limited, which respectively administer the DB and DC sections of the Plan (explained below) on our behalf, may have obtained information from you.

Sometimes we get information from other sources, for example, another scheme if you have transferred benefits from them, government departments such as HMRC and DWP and publicly accessible sources (eg the electoral roll) if we have lost touch with you and we are trying to find you.

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

#### **Our legal basis for using your personal information including how we share it**

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

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights and to prevent and detect crimes such as fraud. Your personal data is processed in accordance with UK data protection legislation

We also have a legitimate interest in properly administering the Plan. This includes paying benefits as they fall due, purchasing insurance contracts, communicating with you and ensuring that correct levels of contributions are paid, benefits correctly calculated and the expected standards of Plan governance are met (including to follow Pensions Regulator guidance).

In order to achieve this, we may share your personal information with various organisations; employers; the Plan administrator(s); the Plan actuary; our professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health (or other sensitive personal information and special category data), we may ask for your consent. You can withdraw your consent at any time by using our contact details (below). This may affect what we can do for you unless we have another lawful reason permitting us to use your information.

## **How to contact the other Organisations we give your personal information to**

Organisations who are also controllers of your information will be bound to comply with their regulatory responsibilities as data controllers and are subject to the same legal obligations when using your personal information.

If you want any more information from any of these recipients or to exercise any rights in relation to the information they hold, please contact the Trustees and we will put you in touch with them.

The main organisations that we regularly communicate with are the DB Plan administrators and links to their privacy statements are below:

### **Aon (Defined Benefit Plan – “DB”)**

Our advisers, Aon, have set out an explanation of how they, and the Plan’s actuary, use personal information when providing actuarial, investment and administration services to pension scheme trustees; this explanation can be found at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>.

## **International transfers of personal information**

The personal information we collect in relation to the Plan is primarily held and processed within the UK. From time-to-time, the Plan administrators or other organisations we share this information with might share your personal information with operations outside the UK in order to assist with the running of the Plan. This would only be to organisations that are either in the European Economic Area (and so have data protection laws providing the same degree of protection as in the UK) or to other countries where comparable protections are in place, as required under the UK’s data protection laws.

Details of these protections can be obtained from us.

## **How long we keep your personal information for**

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

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so.

However, some information may be kept for a longer or shorter period depending on how 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).

## **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;
- 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.

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.

The Plan administrator’s contact details for exercising these rights are set out below and they can supply more information about these rights to you on request.

### **Queries and further information**

The Trustees have a Data Protection Policy which can provide further details on how your personal information is processed, please contact [reward.3@global.lmco.com](mailto:reward.3@global.lmco.com) for a copy of the policy.

If you want more information about what we do with your information and what your rights are, the Trustees can be contacted through [reward.3@global.lmco.com](mailto:reward.3@global.lmco.com).

### **Complaining to the Information Commissioner's Office**

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal information in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office on 0303 123 1113. However, we are here to help and would encourage you to contact us to resolve your complaint first.