

Satake UK Pension Scheme (the "Scheme")

Personal information and what we do with it

As the Trustee of the Scheme, we need personal information about you to run the Scheme and pay benefits. In legal terms, we are a "data controller" in respect of the information we hold about you. 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.

Similarly, other parties involved in running the Scheme may also need to collect and use information about you to carry out their functions. This includes the Scheme Actuary (currently Kathryn Connell of Aon Solutions UK Limited) who, together with Aon Solutions UK Limited, will also be a "data controller" for these purposes.

Aon Solutions UK has also issued a privacy notice on behalf of itself and the Scheme Actuary, which is available at:

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

Aon Solutions UK may make changes to their privacy notice from time to time so you should check the latest version of their privacy notice online. As Trustee, we take your privacy very seriously and we ask that you read Aon Solution UK's privacy notice carefully as it contains important information.

In this notice, you will see information about what we do 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.

What personal information we have

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

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment).
- Your sex/gender (we use this to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. 'Mr., Mrs., Ms.').
- 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.
- Details of any contributions paid by you or on your behalf to the Scheme, including additional voluntary contributions (AVCs).
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Scheme.
- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state pension.
- Correspondence that we may have received about you from your appointed independent financial adviser.

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.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).

- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

Where we get personal information from

Some of the information we have comes directly from you. In addition, Aon Solutions UK Limited, who administer the Scheme on our behalf, may have obtained information from you and passed it to us. We may then in turn pass information about you to the other Scheme advisers, brokers and insurers or may instruct Aon Solutions UK Limited (as the Scheme's administrator) to do so.

Sometimes we get 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 (e.g. the electoral roll) if we have lost touch with you and are trying to find you. We may in turn pass this information on to our advisers who assist us in running the Scheme.

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.

Why we hold personal information and how we share it

We 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.

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. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

We also have a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; purchasing insurance contracts; 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, we may share your personal information with various people including: other organisations and individuals. This may include any new trustees or trustee directors; the Scheme employers; the Scheme administrator; the Trustee Advisers; the Trustee's other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; and IT and data storage providers and other service providers, such as printers who help the Trustee prepare communications which the Trustee send to members, and tracking and tracing services. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

We may also report relevant information (which would potentially include personal data) to the Money and Pensions Service, the Pensions Regulator, or the Financial Conduct Authority.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use information about your health (or other very personal information, such as details about personal relationships relevant to who should receive benefits on your death) without consent, and we will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting us using the contact details given below. This may affect what we can do for you, unless we have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, but then you withdraw that consent, we will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

We 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, we may share your personal information with the employers and their advisers so that they can contact you for that purpose.

We may need to share personal data with insurers in relation to the purchase and pricing of insurance contracts called 'annuities' (unless that can happen based on anonymised data). Insurers will use that data to verify the assets and liabilities of the Scheme. We may write to you before purchasing an annuity to ask for up-to-date information about your spouse/partner/children/other dependants, for this purpose.

We will share your personal data when we purchase the annuity, and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). We will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Scheme membership ID number; marital status and details about spouse/partner; date of birth; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

Scheme Actuary

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustee and the Scheme Actuary for statistical research, but only in a form that no longer identifies you. In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustee has anonymised before sharing with them.

How to contact the other people we give your personal information to

Some of the organisations and/or individuals mentioned above just use your personal information in the way we tell them. However, others (including the Scheme Actuary) 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 controllers" 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.

If you want any more information from any other people/organisations who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

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 Scheme and pay any benefits due to or in respect of you.

We will 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. To meet this aim, we will keep your information for as long as is necessary to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payment), complaints (from you or them), and our legal obligations mentioned in this notice.

Please note in addition, the Scheme's Independent Trustee (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Scheme. Information about PAN's approach in this situation to data security as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>

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 the Scheme administrator's contact details, which are set out below. The Scheme administrator can also supply more information about these rights to you, on request and can also supply more information described in this notice about the Scheme Actuary and/or Aon Solutions UK Limited.

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. 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).

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact us via the Scheme administrator at: **satake.pensionsmailbox@aon.com or Aon, PO Box 196, Huddersfield, HD8 1EG.**

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.