



Privacy Notice
for the
Pension Plan of Savills
June 2022

Pension Plan of Savills - Privacy notice

Savills Pension Trust Company Limited is the Trustee of the Pension Plan of Savills.

We are making this notice available to you because you are a member of the Scheme.

As Trustee, we process 'personal data' about you in order to run the Scheme and pay benefits. We also share your personal data with some other people. Personal data is any information that could be used to identify you as a living individual.

This privacy notice describes what personal data we collect about you and other people (for example, your spouse, civil partner, partner or dependants).

It also describes how we process (i.e. handle) your personal data, the basis upon which we process it, with whom it is shared, how it is stored, how it is protected and what rights you have in relation to it (including a right to object to processing in certain circumstances).

Please read this privacy notice carefully as it contains important information.

1. What personal data do we collect about you and how?

We collect personal data from you in a number of different ways:

- you may share information with us (for example, when you joined the Scheme or when you apply for benefits);
- we may collect certain personal data from third parties (further details are below);
- we may also generate certain personal data in our running of the Scheme (for example, information relating to your contributions and benefits).

We collect personal data from the following third parties:

- your current or former Savills employing Company;
- any financial or other adviser or representative acting on your behalf and, if you want to transfer benefits, the trustees or managers of other pension schemes of which you are or have been a member;
- providers of services that allow us to verify the accuracy of your personal data (for example, to trace your current address or to verify your continuing existence); and
- public databases (for example, the register of births, deaths and marriages), government agencies (for example, Her Majesty's Revenue or Customs (HMRC) or the National Insurance Contributions Offices (NICO)).

We may collect and use the type of data set out below.

In certain circumstances, we may ask you for personal information which is more sensitive.

Examples would be where we ask for information on sexual orientation, criminal convictions, or information relating to your health (for example, if you cannot work any longer due to incapacity and you want to take your pension benefits early).

When we ask for sensitive information, we will only ask for as much information as we need. We will also explain to you why we need that information and how we intend to use it.

When we need to, we will ask for your consent for us to use your sensitive information. However, there are some cases in which we do not need your consent.

You may also need to provide us with personal data relating to other people (for example, your spouse, civil partner, partner or dependants). When you do so, you will need to check with them that they are happy for you to share their personal data with us and for us to use it in accordance with this privacy notice.

2. How do we use your personal data?

We primarily use your personal data for the purposes of operating the Scheme. This includes making decisions about you and your options and entitlements, and calculating your benefits and communicating with you.

It also includes matters to do with the wider operation of the Scheme. For example, we use personal data to calculate the Scheme's liabilities and the sums that the employer(s) need to pay to the Scheme. We may also use personal data to set up insurance policies to meet Scheme liabilities, in connection with liability management exercises, transferring your benefits to another scheme or arrangement, a scheme merger, or any proposal to make changes to the Scheme's benefits.

We will also use your personal data for the purposes of complying with any laws, and procedures which apply to us, answering questions, dealing with complaints and in order to exercise or defend our legal rights.

We will occasionally use your personal data for the purposes of statistical analysis or to respond to government surveys (for example, questionnaires sent to us by the Pensions Regulator or the Office of National Statistics), but this is usually completed on an anonymous basis.

If we wish to use your personal data for any other purpose, we will update this privacy notice.

3. What is our lawful basis or ground for using your personal data?

Under laws which are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.

As Trustee, we have certain duties and powers which are conferred on us by law or by the Scheme's governing documents. In most cases, our processing of your personal data is necessary for the performance of those duties and exercise of those powers.

Certain uses of your personal data, or other processing activities, will not be strictly necessary to perform our legal duties, or to exercise our powers; however, they will be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean ours (or a third party's) interests in operating the Scheme as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure.

If we rely on our (or a third party's) legitimate interests for using your personal data, we will undertake a *balancing test* to ensure that our (or the third party's) legitimate interests are not outweighed by your interests. You can ask us for information on this balancing test by contacting the Data Protection Contact.

If we are processing personal data in a certain way because it is in ours (or a third party's) legitimate interests (not, for example, because it is necessary for the performance of our legal duties), you have the right to object to this processing.

In certain circumstances, we will need your consent to collect and use your personal data; this is most likely where we are collecting and using information relating to your health, or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, sex life or sexual orientation. If we have asked for your consent, you may withdraw your consent at any time.

You may withdraw your consent, or object to our processing of your personal data in a certain way (where you have the right to do so), by contacting the Data Protection Contract.

However, if you withdraw your consent or object to our processing of your personal data, this may impact our ability to consider whether you are eligible to receive benefits, put your benefits into payment, and / or continue to pay benefits to you.

4. In what circumstances do we share your personal data?

We will share your personal data with the following categories of third parties:

- your current or former Savills employer - for the purposes of operating the Scheme, or the future operation of the Scheme;
- our administrators – we delegate some of our duties as Trustee administrators; they are effectively responsible for the day-to-day running of the Scheme;
- the Scheme actuary – this is an actuary that is personally appointed to the Scheme to provide us with advice on the funding of the Scheme. The actuary will be supported by

an actuarial team who will also have access to your personal data;

- our benefit consultants – they provide advice on all aspects of running the Scheme including the level and form of benefits to be provided to members of the Scheme, investment, member communication and strategies for managing and mitigating the risks associated with the Scheme;
- our insurers – they provide insurance cover for the payment of death benefits and historically provide annuity policies securing the Scheme benefits;
- our investment managers and AVC providers – they invest the Scheme assets on our behalf;
- our auditors – they prepare the Scheme's annual accounts and audit them for us;
- our lawyers – they advise us on all legal issues affecting the Scheme;
- our indemnity insurers;
- Pension Plan Manager and Pension Benefits Administrator employed by Savills plc and other companies that provide services to us (or to our administrators), such as communications consultants, printers, suppliers of data cleansing, verification and tracing services and information technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services;
- any financial adviser you appoint in relation to transferring your benefits to another pension scheme (and the trustees or managers of the pension schemes you transfer or your benefits are transferred to); and
- statutory bodies (for example, the Pension Protection Fund), or government agencies in connection with contracted-out benefits (for example, Her Majesty's Revenue or Customs (HMRC) and the National Insurance Contributions Offices (NICO)).

The names and contact details of the third parties that we share your personal data with are available on request from the Data Protection Contact.

We will also disclose your personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or any lawful request from any legal or regulatory authority; or
- to respond to any claims, and to establish, exercise or defend our legal rights.

As Trustees, we are a data controller of your personal data. This means we are responsible for keeping your personal data safe and secure.

Some of the third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us. They are known as 'data processors'.

We will ensure that any data processors with whom we share your personal data are subject to privacy and security obligations consistent with this privacy notice and applicable laws.

Certain third parties (most notably, the Scheme actuary, insurers, auditors, lawyers, and other professional advisers) are themselves subject to certain legal or regulatory obligations (including professional codes of practice). They will be data controllers (and so directly responsible to you for their own processing of your personal data) to the extent that processing is subject to, or relates to, those obligations.

5. Do we transfer your personal data outside the UK and the EEA?

Your personal data will be stored within the UK and the EEA. However, we also utilise service providers located in countries outside of the UK and the EEA to provide additional support to the Scheme. This means that personal data may be transferred to countries outside of the UK and the EEA, as the service providers may have access to your personal data.

Where this is the case, we will ensure that appropriate safeguards are put in place to protect your personal data. We will also ensure that the transfer of personal data is made in accordance with applicable data protection laws.

Further details on the steps we take to protect your personal data in these cases are available from on request by contacting the Data Protection Contact.

6. How long do we retain your personal data?

We keep your personal data for no longer than we need to for the purposes for which we use it, as set out above.

We will need to keep your personal data for as long as you are a member of, or receiving benefits from, the Scheme. If you die, we will continue to hold your personal data to pay any benefits due to your spouse, civil partner, partner or dependants.

We will also keep your personal data for as long as necessary to answer any questions about the administration of the Scheme, deal with any complaints or claims, exercising or defending our legal rights, or complying with any legal or regulatory requirements. We will keep your personal data even if you have no spouse, civil partner or dependants, or if your spouse, civil partner or dependants die, or if you transfer out of the Scheme.

We need to keep your personal data this long because of the long term nature of pension schemes, and the fact that questions can arise many years after someone has died or left the Scheme.

7. What are your rights in relation to your personal data?

You have the following rights in relation to your personal data. You can ask us for more information about any of these rights by contacting the Data Protection Contact:

- (a) **Right of access.** You have a right of access to any personal data we hold about you, including asking us for a copy of your personal data;
- (b) **Right to update your information.** You have a right to request an update to any of your personal data which is out of date or incorrect;
- (c) **Right to delete your information.** You have a right to ask us to delete any personal data which we are holding about you in certain specific circumstances;
- (d) **Right to restrict use of your information:** You have a right to ask us to restrict the way we process your personal data in certain circumstances;
- (e) **Right to data portability:** You have a right to ask us to provide your personal data to a third party provider of services in certain circumstances;
- (f) **Right to object.** Where we process your personal data on the basis of our, or another person's, legitimate interest, you have a right to ask us to consider any valid objections which you have to our use of your data.

We will consider all requests from you to exercise your rights (including whether they apply in a particular case) and provide our response within a reasonable period. In any event we will provide a response within one month of your request, unless we tell you we are entitled to a longer period.

Please note that certain personal data may be exempt from such requests, for example if we need to keep using the information to comply with our own legal obligations. If an exception applies, we will tell you this. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

8. How do we keep your personal data secure?

The main risk of our processing your personal data is if it is lost, stolen or misused. For these reasons we are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and to take all reasonable precautions to safeguard the confidentiality of personal data.

Although we make every effort to protect the personal data which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge that we cannot guarantee the security of personal data transmitted to us over the internet, and that any such transmission is at your own risk.

Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access, and take steps to ensure that any third parties with whom we share your personal data do the same.

9. Changes to this privacy notice

We may amend this privacy notice from time to time. Any changes we make to our privacy notices in the future will be notified to you in the next communication from us to you, such as the annual summary funding statement, your annual deferred benefit statement (if sent), member newsletter, popular report and accounts or an updated version of the Scheme explanatory booklet.

10. Further questions or making a complaint

If you have any queries or complaints about our collection, use or other processing of your personal data, or if you wish to exercise any of your rights in relation to your personal data, please contact the Data Protection Contact.

We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data.

You may also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection regulator, or a different data protection regulator in the country where you usually live or work, or where an alleged infringement has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

11. Personal data we process

We may collect and use the following types of personal data about you and, in some circumstances, your spouse and/or civil partner, which may include

- name(s);
- gender;
- national insurance number;
- employee and membership number;
- date of birth;
- home address and post code;
- marital status and family / dependants (e.g. benefits payable on death);
- your current or former Savills employer;

- the date you joined and left employment and employment status (e.g. full time or part time);
- dates on which you joined and left pensionable service;
- your salary information;
- your normal or anticipated retirement date;
- your status as a member of the Scheme;
- circumstances of retirement or leaving service;
- information relating to your health (e.g. in relation to incapacity benefits);
- information relating to your benefits (including any contracted-out benefits);
- information relating to any money purchase benefits in the Scheme including any transfers in, and as appropriate where how these are invested);
- information relating to any pension sharing or earmarking order);
- tax information including your income tax band and any protections that you may have in relation to your pension benefits; and
- your bank account details when you become a pensioner.

12. Defined terms

In this privacy notice, the following terms have the following meanings:

Scheme means Pension Plan of Savills

Trustees, us, we or our means the trustees of the Scheme being Savills Pension Plan Company Limited.

Data Protection and Trustee contact

Mary Hind-Fletcher,
Pension Plan Manager,
Savills plc.
Finsbury Circus House,
15 Finsbury Circus,
London
EC2M 7EB

This privacy notice was updated on 16 June 2022

In Appendix 1 there is a brief description from our pension provider, Aon, on how they use your personal data in order to support us in the running of the scheme.

Appendix 1

Aon Solutions UK Limited “QUICK READ” PRIVACY NOTICE

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 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 <https://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 scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH RI.UK.PrivacyChampions@aon.com