

## DATA PROTECTION AND PENSIONS

# WEETABIX GROUP PENSION SCHEME

## PRIVACY NOTICE

### Who are we?

We, WGPS Trustee Company Limited, are the Trustee of the Weetabix Group Pension Scheme (the **Trustee, we or us**). We collect, hold and use personal information to help us run the Weetabix Group Pension Scheme (the **Scheme**).

### Why are we writing to you?

The Trustee is a data controller in respect of the personal information that we hold in relation to the Scheme. Because we use your personal information, we have to provide you with certain information as required by the UK Data Protection Laws.

This notice contains a summary of information about:

- the personal information we collect about you, what we do with this information and why we hold it. This is explained in more detail in section one (see page 3).
- who else we get personal information from and who else we share personal information with. This is explained in more detail in section two (see page 6).
- what rights you have in relation to your personal information and who to contact if you have any problems. This is set out in section three (see page 7).

In the 'Further Information' section, you can find more detailed information about:

- how and why we process your personal information in Part One;
- your rights in relation to your personal information in Part Two;
- third parties with who we share your information with in Part Three; and
- an explanation of the key terms and phrases that are used in this notice in Part Four.

## Where can I get more information?

This notice is available on Weetabix's website. We also provide printed versions (including large print versions) on request.



**This notice explains how the Trustee processes your personal information.** Please read this notice (and any other privacy information that we send to you) so that you are aware of how and why we are using your personal information.



**We may change this notice from time to time.** Please visit the webpage or contact us in order to receive the most up to date version of this notice. Our contact details are set out in section three of this notice (see page 7).

## SECTION ONE

# ABOUT YOUR PERSONAL INFORMATION

### What information do we collect and process?

We collect and process your personal information because you are or were a member, or are or were connected to a member of the Scheme. We also collect personal information if you contact us in connection with your membership of the Scheme.

We collect and process the following categories of personal information about you:

- **personal contact details** – names, titles, addresses, telephone numbers and email addresses;
- **information about you** – dates of birth, gender, marital status, dependents, next of kin passport, marriage certificate and criminal records;
- **payroll information** – National Insurance numbers, payroll numbers, bank account details, tax status, salary; and
- **employment related information** – name of employer, employment service start and, where applicable, end date; and
- **pension benefits** – information about the type of pension and benefits that you have accrued, investment choices, death benefit nomination forms and any other expression of wishes and the identities of other beneficiaries such as dependents and next of kin.

If you are connected to a member of the Scheme, we will process your personal contact details and information about you and also your identification documents (such as passport, driving licence, birth certificate).

### What special category data do we collect and process?

We usually only ask for special category data when it is required to help us make a decision in relation to your rights under the Scheme. For example, we may request:

- health information / medical records –when you request payment of a benefit that can only be paid if you meet certain medical criteria (e.g. ill health early retirement benefits) or if insurers require it for additional underwriting. In addition to receiving this information from you, we may receive medical information from third parties such as your doctor or a third party occupational health provider; or
- other special category data– we may ask you to provide other special category data (e.g. information about your personal relationships) if it is relevant to help us decide on an internal dispute resolution procedure.

In addition, certain categories of special category data (e.g. race, ethnicity, religious beliefs and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Scheme and determine the status of your relationship. You may also decide to provide us with special category data voluntarily (e.g. when raising queries or making a complaint).

Please see below **Further Information – Part One, more about how and why we process your personal information** for more details on the personal information we collect and process about you.

## How do we collect your personal information?

When you joined the Scheme, you and/or the Weetabix group provided personal details so that we can create your membership record.

This information is updated whilst you are a member of the Scheme, even if you have since left service with the Weetabix group. Updated information may come from:

- you (e.g. if you get in touch to let us know a new address);
- the Weetabix group (e.g. updated salary and payroll information); and
- other third parties (e.g. if you contact the Scheme's administrator to update your personal information or if HMRC provides us with information so that we can deduct the correct level of tax), or if we need to obtain documentation (such as birth certificates or death certificates) from local authorities.

In addition, we may request additional information in certain circumstances (e.g. if you request to transfer your benefits to another pension scheme, if you apply for ill-health benefits or when you ask for your benefits to start being paid).

## Why do we process your personal information?

We use this information in connection with the operation of the Scheme, including to:

- set up your membership record for the Scheme;
- manage your membership of the Scheme;
- send you information that is relevant to your membership of the Scheme;
- calculate, pay and settle any benefits that you are entitled to from the Scheme;
- comply with our legal and regulatory duties;
- help manage risks and liabilities in the Scheme in order to seek to be able to pay full benefits as far as possible;
- help the Scheme's sponsoring employers comply with their legal and regulatory duties;
- communicate with members with information about the Scheme; and
- improve our information and knowledge of pension schemes generally.

## What are our legal grounds for processing your personal information?

### In order to comply with our legal obligations

As the Trustee of the Scheme, we are under legal obligations to process your personal information in order to comply with pensions and other relevant legislation, the Scheme's rules, court rulings and Pensions Ombudsman decisions. For example:

- legislation sets out certain things trustees must do (e.g. sending certain information to the Scheme's members); and
- we are subject to fiduciary duties under trust law to act in line with the Scheme's governing documentation.

It is necessary for us to process your personal information in order to comply with these legal obligations.

### **In order to fulfil our legitimate interests**

Processing your personal information is also lawful if it is based on our 'legitimate interests'. We have a legitimate interest in running and managing the Scheme and managing the Scheme's risks and liabilities. In addition, certain third parties may have legitimate interests which require the processing of your personal information by the Trustee (e.g. the Weetabix group may need information in order to comply with regulatory requirements).

In order to rely on this legal ground, we have:

- considered the impact the processing has on your interests and rights; and
- implemented appropriate safeguards to ensure that your privacy is protected as far as possible.

### **What are our legal grounds for processing your special category data?**

There are four legal grounds that allow us to process your known special category data):

- when processing is **necessary** for carrying out obligations under employment, social security or social protection law. This includes obligations under pensions law;
- when processing is **necessary** for reasons of substantial public interest (which, under the Data Protection Act 2018, applies to certain processing by trustees of occupational pension schemes when making decisions about benefits);
- when we need to establish, exercise and **defend legal claims**; and
- if we obtain **explicit consent** from you (e.g. when you sign one of the Scheme's forms which contains the appropriate consent wording). It is very rare that we will do this as typically we need to use your personal information data in order to carry out our legal obligations.

We may also process special category data about a nominated beneficiary who is your parent, grandparent, great grandparent or sibling without consent if it is necessary for determining eligibility or benefits under an occupational pension scheme and it does not involve measures or decisions about you. In such circumstances, we may rely on paragraph 21 of Schedule 1 of the Data Protection Act 2018.

### **What would happen if we did not collect and process your personal information?**

If we did not collect and process your personal information then:

- we would not be able to manage or administer the Scheme appropriately;
- we would not be able to pay the benefits that you are entitled to under the Scheme; and
- we would be in breach of our legal and regulatory duties.

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

The Scheme was set up to provide benefits over a very long time. We need to maintain records in order to properly run the Scheme, to determine who should receive what level of benefits and when they should receive them, and to respond to any disputes about an individual's rights under the Scheme.

As a result, the Trustee will generally keep your personal information for the lifetime of the Scheme plus 15 years (the longest period of time that someone can bring a claim against the Scheme). Our service providers (and former service

providers) may also have similar valid grounds to keep your personal information for such long periods in accordance with their respective privacy notices.

## SECTION TWO

# USING AND SHARING YOUR PERSONAL INFORMATION

### How do we keep your personal information secure?

We use a range of measures to safeguard your personal information, in line with the requirements set out in the UK Data Protection Laws. These apply to both paper and electronic records. We also require our third party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal information.

### What do we do with any personal information that is provided by third parties?

We receive personal information from sources other than directly from you. This includes information shared by the Weetabix group, the Scheme's administrator, its professional advisers, service providers and other relevant third parties.

When we receive this information, we add it to the information we already hold about you in order to help us make sure that your details are as up to date and accurate as possible and so that we can manage your membership of the Scheme and the Scheme more generally.

### Who do we share your personal information with?

For the purposes of administering and managing the Scheme, managing its risks and liabilities, and paying benefits under it, we may need to share your personal information with third parties. This will include the Weetabix group (e.g. the payroll, finance, compliance, audit and HR teams). It will also include third parties who provide advice or services to us.

These third parties may include actuaries, administrators, auditors, insurers, prospective insurers, lawyers, medical advisers, qualifying pensions dashboards providers, providers of investment platforms and products and any other third parties engaged by us in connection with the operation of the Scheme and to enable us to carry out their duties. A list of key parties with whom we share your personal information is set out in Further Information – Part Three. Some suppliers and service providers are also controllers in respect of your personal information.

In addition, like any organisation, we need to use suppliers to operate our systems, keep our records, send out correspondence to our members etc. These suppliers act as processors and must act in accordance with our instructions.

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal information to the Pensions Regulator or HM Revenue and Customs.

We may also share your personal data with the Weetabix group to enable them to carry out activities in their legitimate interests (this is usually in connection with managing their business from a regulatory, HR or finance perspective).

Sometimes, in order to improve our knowledge and information of pension schemes generally (so that we may improve our ability to run the Scheme appropriately) we pool the personal data we hold with that of other pension schemes through third parties (for example, to obtain up to date and more accurate longevity data).

## SECTION THREE

# YOUR RIGHTS AND WHO TO CONTACT

### What rights do you have in respect of your personal information?

You have the following rights in respect of your personal information:

- the right to **object** to us processing your personal information;
- the right to request **access** to personal information relating to you;
- the right to request that we **correct any mistakes** in your personal information;
- rights in relation to **automated decision taking**;
- the right to request to **restrict or prevent processing** of your personal information;
- the right to request to have your personal information **deleted**.

Please see below **Further Information – Part Two** for more information about your rights under the UK Data Protection Laws for further details.

### How will we respond to your request?

We will usually respond to any request that you make in relation to your rights within 30 days of receiving your request. If your request is particularly complex, we will let you know that we've received your request and let you know when we aim to respond. You can find out more about your rights under the UK Data Protection Laws at [www.ico.org.uk](http://www.ico.org.uk).

Under the UK Data Protection Laws, there are exemptions which mean that we may continue to process your personal information (for example where we need to comply with a legal requirement or have a legally valid legitimate interest in doing so) even if you ask us not to.

### What should you do if you have any questions or complaints?

You may be entitled to compensation for damage caused by breach of the UK Data Protection Laws. If you do not think that we have processed your data in accordance with this notice, please contact us in the first instance (see 'How to contact us' below). If you are not satisfied, you can complain to the regulator, Information Commissioner's Office. Information about how to do this is available on their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by calling their helpline on 0303 123 1113.

### How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to the scheme secretary at [Weetabix@dalriadatrustees.co.uk](mailto:Weetabix@dalriadatrustees.co.uk)



## FURTHER INFORMATION – PART ONE

### MORE ABOUT HOW AND WHY WE PROCESS YOUR PERSONAL INFORMATION

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
Address	We use this information so that we can send you information that we are legally required to provide you with. In addition, we use this information to get in touch with you when we need to in order to run the Scheme. Finally, we use it to send you information that we think will be relevant to you as a member of the Scheme.	We have a legal obligation to send certain information to members of the Scheme.  In addition, we may send additional information to fulfil our legitimate interest of running the Scheme.	This information was initially provided by you or the Weetabix group when you joined the Scheme.  The Weetabix group may share updated information if you update your records with HR. In addition, you may have updated your information by contacting us or the Scheme's administrator.
Telephone number			
Email address			
Name and title	We use this information to identify you and to create and update your membership record in the Scheme.	We have a legal obligation to pay the correct level of benefits to the correct individuals. This requires us to obtain and update this information.	If a member's details are not kept up to date, we may lose contact with that member. In these cases, we may use a third party tracing agent to obtain up to date contact information.
Date of birth and your Scheme retirement date			
Gender			
Marital status	We use this information to help us decide who should receive what benefits from the Scheme.	We also have a legal obligation to properly identify individuals who receive or may receive benefits from the Scheme.	The Scheme's administrators may create a unique reference number so that your records can be easily identified.
Dependents			
Next of kin			
National Insurance number	We use this information to identify you and to create and update your membership record in the Scheme. Your National Insurance number is also needed so that we can receive the correct information from HMRC and so that we can deduct the correct level of tax from your benefits.	The Trustee is also required to comply with tax legislation and deduct the correct level of tax from benefits.	Your bank details provided by you when you fill in your membership form and when you update your details.
Employment start and, if applicable, end dates			
Payroll number			
Scheme reference number	We use this information in order to pay your benefits under the Scheme directly to you.	Processing this information also fulfils the Trustee's legitimate interests in running and managing the Scheme.	Your tax status is provided to us by the Weetabix group and/or HMRC.
Bank account details			
Tax status			
Salary details	We use this information to calculate the correct level of your benefits under the Scheme.	Special category data about a nominated beneficiary who is your parent, grandparent, great grandparent or sibling can be processed without consent if it is necessary for	Your salary details are provided to us by the Weetabix group.

<p>Details about your entitlement to pension benefits under the Scheme</p>	<p>We use this information to calculate the correct level of your benefits under the Scheme.</p>	<p>determining eligibility or benefits under an occupational pension scheme and it does not involve measures or decisions about you. In such circumstances, we may rely on paragraph 21 of Schedule 1 to the Data Protection Act 2018.</p> <p>The Trustees are also required to comply with tax legislation and deduct the correct level of tax from benefits.</p> <p>Processing this information also fulfils the Trustees' legitimate interests in running and managing the Scheme.</p>	<p>Details about your entitlement to pension benefits under the Scheme may be provided by the Weetabix group or may be determined by reference to the Scheme's governing documentation. In addition, the Scheme's actuary and administrators will carry out calculations, the results of which will be added to your record.</p>
<p>Investment choices</p>	<p>We use this information to ensure that your additional voluntary contributions and/or money purchase benefits are invested in the correct investment funds.</p>	<p>We have a legal obligation to ensure that the Scheme is run properly and in line with its governing documents. There is also specific legislation that governs payment of contributions into money purchase investment funds.</p>	<p>We (or our third party providers) give you information about the investment options that are available to you. You then provide us with your choices and any changes to your investment choices.</p>
<p>Death benefit nomination forms</p>	<p>We use this information as part of our decision making process when deciding who will receive death benefits.</p>	<p>As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.</p>	<p>You provide us with the information that is contained on our death benefit nomination forms.</p>
<p>Medical information (including medical records and doctors' opinions)</p>	<p>We use this information as part of our decision making process when deciding ill health benefits under the Scheme.</p>	<p>As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.</p>	<p>Medical information relating to you may be provided directly by you, by the Weetabix group, your doctor or by a third party providing health assessments / reports.</p>
<p>Information about your personal relationships</p>	<p>This information is used to determine who is entitled to benefits in relation to your membership of the Scheme.</p>	<p>As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.</p>	<p>This information is usually provided by you. In certain circumstances, we may also need to obtain information from relevant third parties.</p>
<p>Identification documentation of beneficiaries and documentation to prove relationship with the member such as:</p> <ul style="list-style-type: none"> <li>• passport;</li> </ul>	<p>This information is used to:</p> <ul style="list-style-type: none"> <li>• identify a beneficiary of the Scheme ;</li> <li>• determine the status of your relationship with the member of the Scheme;</li> <li>• determine if you are eligible for</li> </ul>	<p>As Trustee of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.</p>	<p>This information is usually provided directly by you or from your next of kin. In more unusual cases (e.g. when we are having difficulty locating a member or identifying their next of kin) publicly available official documentation may be obtained</p>

<ul style="list-style-type: none"> <li>• driving licence;</li> <li>• birth certificate;</li> <li>• marriage certificate;</li> <li>• death certificate; and</li> <li>• decrees nisi / absolute.</li> </ul>	<p>benefits under the Scheme; and trigger certain processes in respect of your benefits under the Scheme (e.g. payment of death benefits or splitting of benefits in cases of divorce).</p>	<p>exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time. Certified copies of official documentation are sometimes essential for the Trustee to make legally valid decisions.</p>	<p>by a third party tracing agent.</p>
<p>Information about criminal convictions of anyone who may be claiming benefits under the Scheme</p>	<p>This information is used to ensure that benefits are not paid where a crime has been committed in order to obtain them, or where any other party is entitled to all or part of the benefits as a result of you or another person's criminal activities (which bar that person from entitlement).</p>	<p>This processing is necessary for substantial public interests in order to comply with a statutory obligation and/or to prevent or detect unlawful acts.</p> <p>Processing this information also fulfils the Trustees' legitimate interests in running and managing the Scheme.</p>	<p>This information is usually provided by you or those individuals who may be claiming benefits under the Scheme. In certain circumstances, we may also need to obtain information from relevant third parties.</p>

## **FURTHER INFORMATION – PART TWO**

# **MORE ABOUT YOUR RIGHTS UNDER THE UK DATA PROTECTION LAWS**

### **(a) Right to object to our processing of your personal information**

Where we are relying on a legitimate interest as our legal grounds for processing you may object to us processing your personal information unless we can demonstrate compelling grounds for continuing to do so. Our legal grounds for processing, and our compelling grounds, are set out in section one of this data protection notice (see page 3) and Further Information – Part One (see page 8).

The key point to note is that, if we cannot continue to process your personal information, we would be unable to ensure that we are providing the correct level of benefits in respect of your membership of the Scheme. As we are legally required to pay the correct level of benefits to the right people at the right time, we need to use your personal information to achieve that requirement.

### **(b) Right to access personal data relating to you**

You can ask us to confirm whether we are processing your personal information. If we are, you may ask us to provide the following:

- a copy of your personal information (please note that, if you want more than one copy of your personal information, we reserve the right to charge a reasonable fee based on our administrative costs for the provision of such further copies);
- details of the purpose for which your personal information is being, or is to be, processed;
- details of the recipients or classes of recipients to whom your personal information is, or might be, disclosed, including, if the recipient is based in a country outside of the UK, what protections are in place in relation to the transfer to that recipient;
- the period for which your personal information is held (or the criteria we use to determine how long it is held);
- any information available about where we obtained your personal information; and
- confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person if possible.

There are certain types of information which we are not obliged to disclose to you, which include personal information which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

### **(c) Right to correct any mistakes in your information**

You can require us to correct any mistakes (including adding missing information) in any of the personal information concerning you which we hold. Please contact us using the contact details set out above.

### **(d) Rights in relation to automated decision making/profiling**

The Trustee does not use automated decision making or profiling.

Automated decision making occurs when decisions are taken solely on automated processes. Under the UK Data Protection Laws, you have the right to ask that, if you are being evaluated any decisions are not solely based on automated processes and to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example where the decision is authorised or required by law and steps have been taken to safeguard your interests.

### **(e) Right to request that we restrict the processing of your personal information**

You may request that we restrict the processing of your personal information in any of the following circumstances:

- where you do not think that your personal information is accurate. In this case, we will start processing again once we have checked whether or not your personal information is accurate;
- where the processing is unlawful, but you do not want us to erase your information;
- where we no longer need the personal information for the purposes of our processing, but you need the information to establish, exercise or defend legal claims; or
- where you have objected to processing because you believe that your interests should override our legitimate interests. In this case, we will start processing again once we have checked whether or not our legitimate interests override your interests.

If our processing is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

### **(f) Right to request that we delete your personal information**

You can ask us to delete your personal information where your personal information is being processed on a legal ground other than for complying with a legal obligation and:

- you believe that we no longer need to process it for the purposes set out in this privacy notice;
- you had given us consent to process it, but you withdraw that consent and there is no other legal ground upon which we can process it;
- you have successfully objected to our processing it; or
- it has been processed unlawfully or has not been erased when it should have been.

### **(g) Right to withdraw consent**

If we have asked for your consent to process special category data, you have the right to withdraw any consent you have given us at any point.

However, as highlighted above, the Trustee only requests special category data that is required to make decisions in respect of specific member benefits or complaints. If you withdraw your consent for us to process this information, we may have to delay or even stop payments / requests until we have sufficient information.

**What will happen if your rights are breached?**

You may be entitled to compensation for damage caused by breach of the UK Data Protection Laws. If you do not think that we have processed your information in accordance with this notice, please contact us in the first instance.

If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by calling their helpline on 0303 123 1113.

## FURTHER INFORMATION – PART THREE

### THIRD PARTIES AND TRANSFERS

For the purposes of administering the Scheme and paying benefits under it, the Trustee may need to share your personal information with certain third parties. This section lists the key third party service providers with whom we share your personal information.

ROLE	THIRD PARTY	OTHER INFORMATION (IF APPLICABLE)
Actuary	Mercer	<p>Mercer and the Scheme's named actuary for statutory purposes use personal data in order to perform actuarial calculations, or as requested by the Trustee to provide advice in respect of the Scheme. The Scheme's actuary has to use personal data in order to fulfil certain statutory or regulatory duties, for example, relating to the formal scheme valuations. Mercer also uses the Scheme's personal data for data analytics purposes, including to create insights, reports and other analytics to improve the quality of and market Mercer's advice, products and services.</p> <p>The Trustee is satisfied that this is a reasonable use for the Scheme's personal data because the Trustee benefits from it. The research, information and analysis is made available to those at Mercer who advise the Trustee so that it can be used to improve and extend the services available to the Trustee. Some of the information may be available to the Trustee directly and helps inform them of pension industry knowledge. Mercer has confirmed to us that none of its data analysis output discloses individual details of Scheme members or other beneficiaries.</p> <p>Our actuary will be a controller for some aspects of their services. You can access their privacy notice here: <a href="#">[insert]</a>.</p>
Pensions Secretarial	Dalriada Trustees Limited	Our pensions secretary will be our processor for some aspects of their services. You can access their privacy notice here: <a href="#">[insert]</a> .
Administrator	Aptia	Our administrator will be our processor for some aspects of their services. You can access their privacy notice here: <a href="#">[insert]</a> .
Legal advisers	Gowling WLG	Our legal advisors are processors for some aspects of their services and controllers for other aspects. You can access their privacy notice here: <a href="https://gowlingwlg.com/en/privacy-statement">https://gowlingwlg.com/en/privacy-statement</a>
Sponsoring Employer	Weetabix Limited	Our sponsoring employer will be a controller for some aspects of their services. You can access their privacy notice here: <a href="#">[insert]</a> .
Auditor	Crowe	Our auditor will be a controller for some aspects of their services. You can access their privacy notice here <a href="#">[insert]</a> .

AVC provider	Equitable Life	Our AVC provider will be a controller for some aspects of their services. You can access their privacy notice here <a href="#">[insert]</a> .
--------------	----------------	---

The Trustee's previous legal advisers, CMS Cameron McKenna Nabarro Olswang LLP, may also hold some of your personal data in connection with the services they provided to the Trustee.

**Transfers of your personal information to an international organisation, or otherwise out of the UK**

Your information may be transferred out of the UK.

Where your personal data is to be transferred outside of the UK, we will make sure that there are appropriate safeguards in place (such as adequacy decisions or standard contractual clauses) as approved by the Information Commissioners Office and/or the UK Secretary of State from time to time.

If you want to know more about how personal data is transferred, please contact us using the details set out above.



## FURTHER INFORMATION – PART FOUR

### KEY TERMS AND PHRASES

<b>Data controller</b>	means the natural or legal person or other body who, alone or jointly with others, determines the purposes and means of the processing of personal data. This means that the data controller exercises overall control over the 'why' and 'how' of a data processing activity.
<b>Data protection principles</b>	<p>means the principles that are set out in the UK Data Protection Laws relating to the processing of personal data.</p> <ul style="list-style-type: none"><li>• lawfulness, fairness and transparency;</li><li>• purpose limitation;</li><li>• data minimisation;</li><li>• accuracy;</li><li>• storage limitation; and</li><li>• integrity and confidentiality.</li></ul> <p>In addition, there is an overarching principle of accountability.</p>
<b>Data processor</b>	means a natural or legal person or other body who processes personal data on behalf of the data controller.
<b>Data subject</b>	means the identified or identifiable living individual to whom personal data relates.
<b>Information Commissioner's Office (ICO)</b>	is the UK's national data protection authority. It is a public body that is charged with regulating information rights, public sector transparency and individual's privacy in the UK.
<b>Personal data or Personal information</b>	means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number etc.
<b>Privacy notice</b>	means the information that is provided to inform individuals about what you do with personal data. Under the UK Data Protection Laws, data controllers must provide accessible information to individuals about the use of their personal data.
<b>Processing</b>	means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>Special categories of personal data</b>	<p>means:</p> <ul style="list-style-type: none"><li>• personal data that is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership;</li><li>• the processing of genetic data, biometric data for the purpose of uniquely</li></ul>

- identifying a natural person;
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation.

**UK Data Protection  
Laws**

means the UK data protection laws and regulations (including the UK GDPR and Data Protection Act 2018) from time to time.