



Invensys Pension Trustee Limited – Member Privacy Notice

The Trustee of the Invensys Pension Scheme (“**the Trustee**”, “**we**”, “**us**” or “**our**”) is committed to protecting your privacy and acting in accordance with your rights under data protection law.

This privacy notice, also known as a fair processing notice, contains information on what personal data the Trustee collects, what we do with this information, the lawful basis on which personal data is processed and what rights you have.

(1) Information we may collect about you

We may collect and process the following information about you (either directly or via third parties):

- (a) your personal details such as your name, gender, age and date of birth, current and former home address, telephone number, e-mail address, national insurance number, bank account details, and country of residence;
- (b) information relating to your benefits such as your member identifying number (which is assigned to you by the Trustee), the date you joined or left the Scheme, your earnings (including any bonuses), contracted-out earnings and pensionable earnings, the category and value of benefits that you have built up or receive (including any contributions), and relevant matters impacting your benefits such as voluntary contributions, fund value, investment choices, pension sharing orders, tax protections or other adjustments;
- (c) information provided in order to allow us to assess your entitlement, e.g. copies of passports and certificates, your tax code and data received from Her Majesty’s Revenue and Customs in order to allow us to calculate your guaranteed minimum pension;
- (d) some employment information, such as name of employer and dates of employment;
- (e) information to allow us to verify your identity and your details, such as utility bills, electoral roll data, bank details sanctions lists and data from credit reference agencies;
- (f) in some cases, special categories of personal data such as your marital status (including spouse / civil partner details) in connection with the payment of benefits or information concerning your health, but only where necessary to assess eligibility to serious ill-health retirement;
- (g) our correspondence; and
- (h) details of your visits to our websites and information collected through cookies and other tracking technologies.

Where applicable, we also collect information about your dependants or next of kin, for example by asking you to complete an expression of wishes form. This helps us to identify potential beneficiaries of death benefits. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, it may be necessary to obtain additional information from you, so we can carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

(2) How we use your information

We use your information for the following purposes:

- (a)** communicating with you in relation to your benefits, 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 plans;
- (b)** for general administration of the Scheme, such as: to administer our services and carry out our obligations including, to verify your identity and your details, to record and pay benefits (including to determine whether any limitations may apply to the payment of your benefits); to produce actuarial valuations; to recover debts due; to manage our administrators; for reviews we or our administrators conduct for statistical and reference purposes; for other administrative activities that may become necessary from time to time (like member tracing, should we happen to lose contact with you); to monitor certain activities; and to prevent fraud;
- (c)** for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- (d)** to carry out our processes, and to improve our processes and our use of technology. This includes testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme. As part of this, we may use your information to make generalised assumptions based on your individual characteristics such as age or gender;
- (e)** when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as longevity planning, insuring Scheme liabilities with an insurer, scheme mergers and benefit changes and options (e.g. pension increase exchanges), including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice;
- (f)** to transfer some or all of your information to a replacement trustee or third party (or its advisors) as part of any due diligence process or transfer to that third party and use for the same purposes as set out in this notice in the event that we are removed as a trustee; and
- (g)** we may remove identifiers from your personal data and use that data for the purposes set out above. We may also remove identifiers from your personal data and disclose it to third parties, including advisors and service providers for data analysis and machine learning purposes.

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

- (i)** it is necessary for our legitimate interests in achieving the purposes set out in 2(a) to 2(g) above. Our legitimate interests include operating and improving the Scheme in an effective, efficient, legal and secure manner;
- (ii)** in some cases, it is necessary to meet our legal or regulatory responsibilities, such as actuarial valuations, and disclosures to authorities, regulators or government bodies referred to below;
- (iii)** when we use special categories of personal data, we do so because it is:
 - in some cases, processed with your consent, namely where we are collecting the special categories

of personal data set out at 1(e) above. **You consent to our processing of this information so that we can adequately administer your benefits.** You may withdraw this consent by contacting us as per section 7 below but please be aware that in most circumstances, we will not be able to administer your benefits without continuing to process this type of information

- in some cases, within the substantial public interest (such as the prevention and detection of fraud and crime);
- in some cases, necessary for establishing, exercising or defending legal claims;

If we cannot collect your personal data for the purposes set out in this privacy notice we may be unable to administer your benefits or record or calculate or pay your or your beneficiaries' benefits.

(3) Disclosures of your information

We typically share your information with the following recipients for the purposes set out in section 2 of this notice:

- a) our suppliers and service providers, including XPS Administration (our Administrator) and other providers of services to us and them, providers of printing and communication services, IT and hosting providers, tracing services, and debt collection services (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);
- b) our advisors including legal, financial and actuarial advisors;
- c) insurance and reinsurance companies, such as when we carry out the activities referred to in 2(e) above;
- d) public authorities, regulators, law enforcement agencies 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;
- e) 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 (e.g. the Pensions Regulator, the Pensions Ombudsman, the police, courts and our legal advisers/representatives)

(4) Security and transfers of your information abroad

We maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal data in accordance with applicable data protection laws.

The use and disclosure of your information for the purposes referred to in this privacy notice may involve transferring your information to countries outside of the United Kingdom (**UK**) and the European Economic Area (**EEA**).

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 in compliance with applicable data protection laws. To ensure an appropriate level of protection, we will impose the same data protection safeguards that we deploy inside the UK or EEA.

Please contact us as per section 7 below if you wish to see a copy of the specific safeguards applied to the export of your personal data.

(5) 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 period envisaged within our retention management policies. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements. In general, we will keep your information until your death, so that we are able to address any queries you may have during your lifetime. Where a benefit is payable to your beneficiaries, we may need to keep information in respect of you and your beneficiaries for longer.

(6) Your rights

You have rights under data protection law of access to; rectification of; and erasure of your personal data and to restrict its processing, and to require certain of your information to be transferred to you or a third party.

To the extent that the use of your information is based on your consent, you have the right to withdraw your consent.

You also have the right to object to our processing of your personal data.

Please note that some of these rights only apply in certain circumstances; and that the exercise of these rights is subject to certain exemptions.

If you wish to exercise any of the above rights, you may write to us at the contact details set out in section 7 below. You can also use these contact details if you wish to make a complaint about how we process your information.

You can also lodge a complaint with the Information Commissioner's Office (www.ico.org.uk) if you are not satisfied with our use of your personal data.

(7) Contacting us

The Trustee is the data controller of your personal data under this notice.

If you have any questions, you may write to Invensys Pension Trustee Ltd, 80 Victoria Street, London, SW1E 5JL

(8) Status of this privacy notice

This privacy notice was last updated on 23 September 2020.

It may be subject to amendments. Any future changes or additions to the processing of personal information as described above in this private notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

The Trustee of the Invensys Pension Scheme

80 Victoria Street, London SW1E 5JL