

WILLIS PENSION SCHEME DATA PROTECTION PRIVACY NOTICE

Willis Pension Trustee Ltd is the sole Trustee of the Willis Pension Scheme (the 'Scheme'). The Trustee is a registered data controller and all members of the Scheme and their dependants (to the extent to which we have collected data) are considered data subjects (persons for whom we collect and process data).

The Directors of Willis Pension Trustee Ltd take the security of your personal information very seriously and are both committed to protecting your personal information and acting in accordance with your rights under data protection law.

This policy sets out how you can expect your personal information to be handled by the Scheme and our service providers and advisors.

Legal basis for using your data

The legal basis for us using your personal information is to enable us to comply with our legal obligations as the Trustee of the Scheme, which include paying benefits to you and other beneficiaries in connection with members' employment (or previous employment) with an employer participating in the Scheme. We also have a legitimate interest in using your personal information to ensure the efficient administration of the Scheme and to help us and the employers participating in the Scheme review and manage financial matters relating to the Scheme, together with our respective advisers.

In certain limited circumstances, your express consent is required (in order to process special categories of sensitive personal information) and will be sought separately. We will make clear to you when your express consent is needed.

If we are not provided with the personal information about you that we need, it may not be possible for us to provide some or all of the benefits otherwise payable in respect of you from the Scheme.

Collection of your personal information

We collect and process the following non-sensitive personal information about you:

- your personal details such as your name, NI number (and/or other evidence of identity), gender, date of birth, home address, country of residence, email address, phone numbers, details of your salary and other forms of remuneration, details of your bank account; and
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, the category and value of benefits that you have accrued, continue to accrue or receive, details of any nominees to be considered for benefits in the event of your death, contributions and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders or other adjustments.

We collect and process the following sensitive personal information about you:

- in all cases the special category of personal information relating to sexual orientation, specifically marital or relationship status; and
- in some cases, special categories of sensitive personal information such as information concerning your health (for example in the case of ill health early retirement and ill health reviews, and where incapacity or similar reasons determine the benefits paid to you) and details of the commission or alleged commission of any offence and any court proceedings relating to the commission of an offence impacting the payment of benefits.

Most of the personal information that we hold is provided by members when they join the Scheme or when they contact the Trustee (or organisations appointed by the Trustee to help with the running of the Scheme) about their benefits. In some cases, personal information is collected directly from your current and former employers participating in the Scheme, other pension schemes and pension providers, independent financial advisers, medical practitioners, other advisers or service providers to the Trustee or from HMRC.

Where applicable, we also collect personal information about your dependent or next of kin. Before providing us with any such personal information, you should provide a copy of this notice to those individuals.

Sharing your personal information with other parties

Where the Trustees consider it necessary for the purposes explained in this notice, your personal information may be shared with selected third parties, such as the Trustee's actuarial, legal and financial advisers and other professional services providers, including those who provide data processing, administration and communication services to the Scheme. The Trustee may also share personal information with regulatory authorities and healthcare practitioners, insurers, AVC providers, financial advisers, annuity brokers, employers participating in the Scheme, HMRC, the Pensions Regulator and any other third parties with whom we are authorised or required by law to share personal information.

Some of the third parties with whom your personal information is shared may be located outside the European Economic Area ('EEA') (for example, this may happen if computer servers used by our providers are located or backed up in a country outside the EEA).

Under data protection legislation, we can allow your personal information to be transferred outside the EEA if:

- (a) the country to which your personal information is being transferred has been confirmed by the European Commission to provide adequate protection for personal information; or
- (b) the entity that is holding your personal information has entered into a written contract which requires it to provide all protections to your personal information required by data protection legislation.

In the event that the UK is no longer part of the EEA, references in this section to the 'EEA' should be taken to mean the EEA and the UK.

Further information about transfers of personal information outside the EEA can be obtained by contacting us.

We will also share personal information with the actuary to the Scheme. The Scheme Actuary, Jeremy Dell of Lane Clark & Peacock LLP, is also a data controller in respect to your personal data that he uses to carry out his functions. For further information please see <https://www.lcp.uk.com/privacy-policy/>

Protection of your personal information

Your personal information is managed by the Trustee and its service providers. The Trustee works with its service providers to ensure compliance with data protection legislation. All service providers and advisors that are registered data controllers and/or data processors for the Scheme have their own obligations and their own policies in relation to data protection.

Retention of your personal information

The Trustee will retain your personal information in accordance with the Willis Pension Scheme data retention policy as it applies from time to time. We will need to keep personal information for as long as is reasonably necessary to determine the entitlement to benefits from the Scheme, to meet regulatory or legal requirements in relation to the administration of the Scheme, and to enable us to respond to beneficiary and regulatory body enquiries.

Your rights

Data protection legislation gives individuals the following rights in relation to personal information held about them:

- individuals can ask what personal information is held about them and be provided with a copy;
- if personal information held about an individual is incorrect, they can ask for it to be corrected;
- individuals can ask for personal information about them to be deleted or for processing of that personal information to cease in certain circumstances, for example, where that information is no longer needed;
- individuals can request that certain types of personal information held about them is sent to them, or another organisation, in a format that can be read by computer; and
- individuals can withdraw their consent to how their personal information is being processed, where and to the extent that processing is based on their consent (but you should note that to do so may impact the ability to administer and pay benefits).

Exercising these rights is subject to certain restrictions under data protection legislation. For further information about these rights, you should write to: Willis Pension Scheme, Friars Street, Ipswich, Suffolk, IP1 1TA.

You can also lodge a complaint about our processing of your personal information with the Office of the Information Commissioner online at www.ico.org.uk or alternatively you can contact the Information Commissioner's Office by phone on 0303 123 1113.

Further Information may be required to carry our requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or settlement of benefits. We will notify you when additional information is required for this purpose.

Status of this privacy notice

This privacy notice is non-contractual. We reserve the right to amend it from time to time.

Contact us

If you have any questions about how your personal information is used, including in relation to the arrangements we have in place with the scheme actuary, please feel free to contact us at the following address:

Willis Pension Scheme
Friars Street
Ipswich
Suffolk
IP1 1TA