

PRIVACY NOTICE FOR THE CHUBB SAFES PENSION PLAN

Chubb Safes Pension Trustees Limited (the "Trustee") holds and processes personal data about the members and beneficiaries of the Chubb Safes Pension Plan (the "Plan") in order to run the Plan. In doing so, we comply with the General Data Protection Regulation and other relevant UK legislation. The Trustee is a data controller in its own right and, in addition, will be a joint data controller with the Scheme Actuary, John Cole of Isio, in respect of personal data that is processed jointly. This notice is issued on behalf of both the Trustee and the Scheme Actuary.

We describe in this notice the personal data which we collect about you and other individuals (for example your spouse or beneficiaries) in connection with your membership of the Plan. Legislation describes personal data as any information that could be used to identify a living individual.

Please note, the Plan's Independent Trustee Director (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 Director of the Plan. 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/>.

What is your personal data used for?

The Trustee collects and processes your personal data for the purposes of complying with their legal duties to administer the Plan and for other legitimate purposes in relation to the ongoing operation and management of the Plan. This includes:

- Communicating with members in relation to their benefits, responding to requests and queries;
- General administration of the Plan, including calculating, recording and paying benefits;
- Meeting the Trustee's ongoing regulatory, legal and compliance obligations;
- Risk management purposes such as longevity modelling, managing Plan assets, insurance solutions, member option exercises (including pension increase exchange and transfer value exercises);
- Improving our processes and use of technology, including testing and upgrading of systems.

The Scheme Actuary, John Cole of Isio, processes your personal data to undertake various tasks relating to the Plan, primarily around scheme funding.

The individual Scheme Actuary may change from time to time and we will inform you of any changes in the Plan's newsletter, which is issued annually.

What personal data do we hold?

We may collect, use or otherwise process the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependant:

- name, gender, address, date of birth, NI number, contact details, marital status;
- bank account details and tax information in relation to your pension benefits;
- information about your membership of the Plan (for example service dates, salary information and benefit amounts);
- information about any other pension arrangements you have.

The Trustee may also hold some special categories of personal data for the purposes of administering the Plan, for example in relation to ill-health or death benefits. Examples of such a category would be more sensitive data that may reveal your racial or ethnic origin, religious beliefs or sexual orientation. We will only hold this data where it is necessary for us to do so in order to properly perform our duties as Trustee.

There are some circumstances in which we may collect sensitive data without your consent, for example, where we need to use it to establish, exercise and defend legal claims. If we need to obtain your consent to use sensitive data, we will explain to you at the time why we need that data and how we intend to use it.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by:

- your current and former employer(s);
- Government organisations, such as HMRC and DWP;
- other pension schemes;
- regulatory bodies;

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- tracing organisations; and
- public databases.

We also receive information from members about their beneficiaries, who may be eligible to receive benefits on the member's death.

Who do we share your information with?

To comply with our legal duties and for the purposes of Plan administration, the Trustee may share your information with:

- the Plan's administrator from time to time (currently Isio) who process information to run the Plan, including payment and calculation of benefits;
- the Scheme Actuary from time to time (currently John Cole of Isio);
- the Plan's auditor;
- the Plan's legal advisers;
- the Plan's investment managers, banks or other service providers;
- your current or former employer and their professional advisors;

- Statutory and regulatory bodies, including but not limited to HMRC, the Pensions Regulator, DWP and tracing organisations;
- Any other person who is authorised to act on your behalf

As Trustee, we are a 'data controller' of your personal data which means that we are responsible for keeping your data safe and secure. Some of the third parties with whom we share your personal data are limited (by law and contract) to using your personal data in certain ways specified by us. They are known as 'data processors' and this includes the Plan's administrator.

Certain third parties (for example, the Scheme Actuary) will be data controllers in their own right. This applies where they are subject to certain legal or regulatory obligations, including professional codes of practice. To the extent their processing of your personal data relates to your obligations, they will be 'data controllers' and are therefore directly responsible to you.

Data transfers outside the UK and the EEA

If it becomes necessary to transfer your data outside of the UK (for example, where a third party service provider stores certain data outside of the UK), the Trustee will ensure that your personal data is adequately protected in a manner which is protected by this privacy notice, and in accordance with applicable laws.

There are several measures for ensuring an adequate level of protection, for example where the Secretary of State in the UK has deemed those countries as 'adequate' (all EEA countries have been deemed as 'adequate'), or where personal data is transferred outside the UK on the basis of standard data protection clauses approved for use in the UK being inserted into contracts with service providers based outside the UK.

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What is our lawful basis for processing your personal data?

Under data protection legislation, we need to have a lawful basis each time we use, share or otherwise process your personal data.

The Trustee has certain duties and powers which are conferred on it by law or by the Plan's Trust Deed and Rules. In most cases, the processing of your personal data is necessary so that the Trustee can perform those duties and exercise those powers (for example, to pay your benefits).

Certain uses of your personal data, or other processing activities, may not be strictly necessary for the Trustee to perform their legal duties and regulatory responsibilities, or to exercise its powers. However, it may be that certain uses of your personal data are necessary for the purposes of the Trustee's legitimate interests.

When we say "legitimate interests", we mean the Trustee's interests in operating the Plan as properly, efficiently and securely as possible. For example, to manage matters associated with the provision of your benefits under the Plan, including offering you choices as to the form or timing of those benefits.

The Scheme Actuary is appointed under pensions legislation and will use your personal data to undertake various tasks, primarily around scheme funding.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Plan is based on information which may go back many years.

Our policy is therefore to retain personal data about our members and their beneficiaries until after their membership of the Plan ends, and for such longer period as is necessary to enable us to ensure the Plan pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Your rights

You have the right to request a copy of your personal data, require that we rectify any errors in the data that we hold, and request that we erase your personal data (but this may affect our ability to pay you benefits).

In some circumstances (for example, where the processing of your personal data is to enable us to pursue our legitimate interests), you can also require that we restrict the way we process your personal data, object to its processing (but this may affect our ability to pay you benefits) or request a copy of your personal data for the purposes of transmitting elsewhere.

If you wish to exercise any of these rights, please contact us using the details provided later.

If in the future we request and obtain your consent, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

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 you provide, 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 in this way.

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

Contact details

If you have any questions about this Notice or would like to exercise your rights in respect of your data, please contact the Trustee or Scheme Actuary using the following contact details:

Isio c/o SPS
PO Box 721
Salford
M5 0QT

Email: Chubb@isio.com

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What if you have a complaint?

If you would like to make a complaint about how we have handled your information, please contact us using the details provided.

If you are not satisfied with our response to your complaint or believe our processing of your data

does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Phone: 01625 545 745

Changes to this privacy notice

The data controllers may change this Notice from time to time and we will notify you of any changes the next time we communicate with you.

This privacy notice was last reviewed and updated in February 2023

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