

BT (CDL) SECTION OF THE PENSIONS MASTER PLAN¹ (“the Scheme”)

Privacy Notice from the Scheme Trustee

The Trustee needs to collect, use and maintain personal information about you in order to run the Scheme and pay benefits. When we do so we are regulated under the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018.

We are responsible as “controllers” of your personal data. In legal terms, the Trustee and the Scheme Actuary, Greg Morris, of Isio Total Reward and Benefits Limited (ITRB), are both independently ‘data controllers’ and whilst we are required to tell you some things about the personal information we have about you, how we use it and what your rights are in relation to it, any other Data Controllers are required to issue their own Privacy Statement under GDPR and relevant data legislation which is available on their website. Accordingly references in this document to ‘we’ or ‘us’ are to the Trustee only.

Collection of your information

Generally, Personal data is any information relating to an identified or identifiable individual. We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone numbers, email addresses, marital status, details of your spouse/civil partner, national insurance number, and country of residence;
- information relating to your employment and benefits, including your employment history, salary information, service history, member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, pensionable service information relating to you, your earnings, the history, category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- financial details, such as bank account details and tax information;
- records of our communications with you, including any complaints; and
- in some cases, special categories of personal data may be held about you, which carry additional safeguarding requirements under data protection legislation. Examples include information concerning your health or relevant medical information in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you); information about your race or ethnicity, religious beliefs, or sexual orientation for monitoring purposes; information regarding Trade Union membership, where relevant to managing your benefits and knowing who represents your interests.

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

In some cases, the above information may also be collected from other sources:

- The employer;
- Members of the Scheme (e.g.: if you are a nominated beneficiary on that Member’s death), people acting on your behalf or tracing services

¹ Currently in the process of being re-named from the BT (CDL) Section of the Deloitte Pensions Master Plan

- Isio Pensions Ltd (company number 09447994) and Isio Total Reward and Benefits Limited (company number 03981512) the current third-party administrator for the Scheme;
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP;
- People acting on your behalf;
- Tracing Services or publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and we are trying to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, 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 schemes;
- b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations and calculations; for reviews we or our administrators conduct for statistical and reference purposes; in connection with any corporate activity a Scheme employer may be engaged in; and for other checks or administrative activities that may become necessary from time to time (like member tracing should we happen to lose contact with you) or to prevent fraud;
- c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and
- e) when we undertake or agree to activities from time to time to help us to determine and manage Scheme investments and risks, manage the liabilities of the Scheme, such as longevity modelling and hedging, insurance, bulk transfers, pension increase exchanges and transfer value exercises, and buy-in and buy-out transactions, 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.

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

- (i) required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- (ii) necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain;
- (iii) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or direct us on benefit payments or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent;

- (iv) necessary for our legitimate interests: in pursuing the purposes set out in (a) to (e) above; in establishing, exercising or defending legal claims; and (when we make the disclosures to your employer for the audit and corporate transaction purposes referred to below) necessary for their legitimate interests, such interests in each case not being overridden by your privacy interests; and
- (v) necessary for your legitimate interests in having your benefits administered correctly.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data, we may be unable to record, calculate or pay your or your beneficiaries' benefits.

Where we hold special categories of personal data, we will explain to you at the time why we need it and how the information will be used. We will only process special categories of personal data where we need to do so to establish a right to a benefit. In any other circumstances where we need to process special categories of personal data, we will seek your prior consent.

Where we are carrying out processing on the basis of your consent, you have the right to withdraw that consent at any time by contacting us on the details provided. Any withdrawal of consent will not impact the lawfulness of the processing which took place prior to such withdrawal.

We will seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to the information we collect for the purposes for which we collect and process it.

Disclosures of your information

The Trustee may share your information with the following recipients:

- our suppliers, including your employer and other providers of services to us and them, such as administrators, Banks and Deposit takers, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Scheme actuary (for actuarial calculations), and printing, communication, IT and hosting, marketing, and tracing providers;
- the Independent Trustee to the Scheme - PAN Trustees UK LLP ("PAN");
- our solicitors – Deloitte Legal – for the provision of legal advice, where required;
- your employer for audit purposes or in relation to corporate transactions initiated by them;
- insurance and reinsurance companies, such as when we carry out the activities referred to above, specifically your data may be processed by Phoenix Life Limited and Canada Life Re, due to the investments the Scheme currently holds to enable those entities to perform their obligations under the transaction and reinsurance documents that the Trustee has with them. You can find their privacy notices at <https://www.phoenixlife.co.uk/legal-and-policies/privacy-notice> and <http://www.canadalifere.com/data-privacy-notice.html>;
- public authorities, regulators 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; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including our own and those of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

This data sharing enables us to administer the Scheme in a compliant manner and ensure that our duties as trustees are discharged lawfully.

We will not share your personal information with any other third party. All third-party service providers are required to protect your personal information in line with our policies and we only permit them access to your personal data in relation to the specified purposes and in accordance with our instructions.

Transfers of your information abroad

The use and disclosure of your information, including for the purpose referred to in (a) to (e) above, may involve transferring your information outside of the European Economic Area. 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 require (through a binding agreement) that the recipients comply with appropriate measures designed to ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom. Further details of these transfers including copies of any data transfer agreements we use are available from us on request.

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

Retention of your information

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To do this, 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 policy documentation. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests.

Please note, the Scheme's Independent Trustee, PAN may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Scheme. 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/>

Your rights

You have rights under data protection law of fair processing and transparency over how we use your personal data. You have a right of access to and rectification or erasure of your personal data and to restrict its processing, and (in some circumstances) to require certain of your information to be transferred to you or a third party. Where you request it, you may receive the personal information we hold about you, and this must be provided in a clear, and understandable manner. You may transfer this information to a third party in certain situations.

You also have rights under data protection law to object to the processing of your information on grounds which we have said are necessary for our legitimate interests (see above), or for marketing purposes (see above). You may object to decisions being taken by automated means which produce legal affects concerning or significantly affecting you.

If you have any questions or wish to exercise any of the above rights, you can contact us as detailed below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent, but this may affect the operation of our service over your benefits and such objection cannot work retrospectively (e.g.: in relation to data already processed).

Further information may be required to carry out 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 allocation of benefits. We will notify you when your information is required for this purpose.

Keeping your Personal Data Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised manner. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will only do so in an authorised manner, and are held to a duty of confidentiality.

We have procedures in place to deal with suspected or actual security breaches. In such unfortunate circumstances we will notify you, and any applicable regulator of the security breach where we are legally required to do so and within applicable time limits.

If you want detailed information from “Get Safe Online” (which is supported by HM Government and leading businesses) on how to seek to protect your information and your computers and devices against fraud, identity theft, viruses or other online problems please visit [getsafeonline.org](https://www.getsafeonline.org).

How to complain

We hope that we can resolve any queries or concerns you might raise about the use of your personal data.

However, the UK GDPR also gives you the right to lodge a complaint about our processing of your personal information with the office of the Information Commissioner (using website: www.ico.org.uk or by calling them on 0303 123 1113).

Status of this privacy notice

This privacy notice was updated in June 2023. It is non-contractual. We reserve the right to amend it from time to time, but will notify you where we do this.

Issued on behalf of

The Trustee of the BT (CDL) Section of the Pensions Master Plan (Previously the Control Data Limited 1991 Pension Plan)

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