

EQUANS Defined Benefit Pension Scheme (the "Scheme")

Personal information and what we do with it

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or the Information Commissioner's Office in the event you have a complaint.

EQUANS Services Trustee Limited (the "**Trustee**"), acting as the trustee of the Scheme, needs personal information about you to run the Scheme and pay benefits. Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustee about how your personal information will be used for those purposes. In legal terms, the Trustee and these other parties are 'joint controllers' in respect of this information. In your case, there is one party who is a 'joint controller' with the Trustee, Natalie Wignall of Isio Group Limited as the actuary of the Scheme (the "**Scheme Actuary**").

The Scheme's administrator is currently Isio Group Limited ("**Isio**"). When providing administration services to the Scheme, Isio acts as a processor and processes member data on behalf of the Trustee. Isio also provides actuarial, investment and consultancy services, including advice and analytics to the Trustee, including through the Scheme Actuary. When providing actuarial services, the Scheme Actuary and Isio act as joint controllers with the Trustee.

In this notice, we explain what the Trustee does with your personal information, and also what the Scheme Actuary does with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information. Except where stated otherwise, 'we' means both the Trustee and the Scheme Actuary where they are acting as joint controllers in relation to your personal information (as described above).

Why we hold personal information and how we share it

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme. In particular, the Trustee has a legitimate interest in properly administering the Scheme and ensuring that the expected standards of Scheme governance are met. We make sure that your own interests are not outweighed or prejudiced by our legitimate interests.

The Trustee will use your personal information to comply with these legal obligations and to establish and defend its legal rights. In order to achieve this, the Trustee may share your personal information with various people as necessary, including: any new trustee directors; the Scheme employers; the Trustee's professional advisers; insurers; HMRC; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; data storage providers, tracking and tracing services, and other service providers.

When the Trustee needs to use information about your health, it may ask for your consent. The Trustee may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme. However, sometimes there may be reasons of public interest or law which enables the Trustee to use information about your health (or other very personal information such as details about personal relationships relevant to who should receive benefits on your death) without your consent, and it will do so where that is necessary to run the Scheme in a sensible way. If your consent is required, you can withdraw your consent at any time by contacting the Trustee using the contact details given below. This may affect what the Trustee can do for you, unless it has another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, then withdraw that consent, we will usually be unable to consider your application. If you withdraw consent after our processing this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

The Scheme's employer may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. Also the Scheme employer assists the Trustee in collating documents and information in order to consider ill-health retirement requests and any internal dispute resolution procedures (IDRPs) relating to you. In such circumstances, the Trustee may share your personal information with the employer and, in turn, information received by the employer may be shared with the Trustee.

We may need to share personal data with insurers in relation to purchasing and pricing up insurance contracts called 'annuities' (unless that can happen based on anonymized data). Insurers will use that data to verify the assets and liabilities of the Scheme. We may write to you before purchasing an annuity to ask for up to date information about your spouse/partner/children/other dependents for this purpose.

We will share your personal data when we purchase the annuity and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). The Trustee will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Scheme membership ID number; marital status and details about spouse/partner; DOB; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

What personal information we have

The data we hold is to assist the Trustee to calculate and pay the benefits to members and this includes your name, your gender (we use this to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you, e.g. 'Mr., Mrs., Ms.,') address, salary, years of service with the scheme, date of birth, NI number and contact details.

We may sometimes use other information about you where it is relevant. This could include information about your health, for example, early payment of benefits from the Scheme, or details about personal relationships (such as your marital status) to determine who should receive benefits on your death, or the impact of divorce on a member's benefits. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

Where we get personal information from

Some of the information the Trustee has comes directly from you. In addition, Isio may have obtained information from you and passed it to the Trustee. The Trustee may then in turn pass information about you to the Scheme Actuary or may instruct the administrator to do so. Sometimes the Trustee gets information from other sources: for example, from your Scheme employer; from government departments such as HMRC and DWP; and from publicly accessible sources.

Scheme Actuary

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. He will use your personal information for this purpose and has a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with his own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers. In some circumstances the Scheme Actuary may also be able to fulfil these purposes using information which the Trustee has anonymised before sharing with him.

Sometimes, your information may be used by the Trustee and the Scheme Actuary for statistical research, but only in a form that no longer identifies you.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of 20 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you. At the end of this period, we will keep a skeleton record including details such as your name, national insurance number, effective date of leaving the Scheme and the reason why benefits have ceased to be payable as evidence that the Scheme has no further liability towards you. However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries, complaints, and our legal obligations mentioned above.

Your rights in relation to your personal information

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or (in very limited circumstances) request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, 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.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection. We do not currently process your information outside the UK. If this occurs in the future, we will take any necessary steps to protect your personal information.

If we do process information outside the UK in future, you can contact us for more information about the safeguards used to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, or wish to exercise those rights, please contact the Trustee via the Scheme Administrator at:

Post: Trustees of the EQUANS Defined Benefit Pension Scheme, c/o Isio Group Limited, PO Box 163, Blyth, NE24 9GS

Email: Equanspensions@ISIO.com

Also, if you want any more information from the Scheme Actuary or any other people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustee via the above contact details in the first instance and the Trustee will either deal with the request directly or put you in touch with them.

If you have concerns about the way we handle your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.