

As you may have heard, the laws on data protection are changing. We continue to take your data privacy seriously and want to update you on what we do with your data and what your rights are. Please find below our updated privacy notice.

Data Protection - Privacy Notice

Jacobs Douwe Egberts UK Pension Plan (the Plan)

In order to run the Plan and pay benefits to you, the Plan's trustees, Jacobs Douwe Egberts UK Pension Trustee Limited (the Trustee), and the Scheme Actuary, Adam Walker FIA of Barnett Waddingham LLP (**together, we**), need to hold and process certain personal information about you (known as "personal data").

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and Scheme Actuary of the Plan are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Plan's auditor or legal advisers.

This notice explains more about the information we hold, how we use it and what your rights are.

What information do we collect about you?

We may collect from you, your Plan employer, medical advisors and other relevant third parties and Government bodies certain personal data for the purposes of providing your Plan benefits and administering the Plan. This may include some or all of the following:

- **Contact details:** information that allows us to contact you directly such as your name, email address, telephone number and current and past addresses.
- **Specific information about you:** information regarding your gender, date of birth, the date you commenced membership of the Plan (including historic pension arrangements from which you transferred into the Plan), the date your active membership of the Plan ended, your retirement date, your date of death, your member reference number, your national insurance number and your marital status.
- **Payment, transaction and financial information:** details of your bank account for payment of your Plan benefits and details of your Plan benefits and tax details.
- **Details of your employment:** information from your Plan employer which is relevant to your Plan membership, including details of your salary and length of employment.
- **Beneficiaries and dependants:** information about your beneficiaries and dependants so that we can pay the relevant benefits following your death.
- **Sensitive personal data:** including any medical condition, health and sickness records and other details about your health relevant to the payment of your Plan benefits. We will only ever hold and process this data where you have given your explicit consent for us to do so.

How do we use that information?

As the data controllers, we will collect and use this information for the purposes of complying with our legal duties to administer the Plan and for other legitimate purposes relating to the operation of the Plan. This includes:

- Calculating, administering and paying your benefits under the Plan.
- Dealing with any queries or complaints.
- Complying with legal, regulatory and good governance obligations.
- Conducting studies and other assessments in respect of the Plan.
- Retaining appropriate records.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you and ceases to be your personal data). Your personal data may be anonymised and aggregated for purposes that include research, studies, actuarial valuations and data analysis.

Who do we share your personal data with?

We are not allowed to disclose personal data about you to other organisations and people, unless the law allows us to or you have given your consent. As we need to share information with others in order to provide your benefits under the Plan and comply with our legal obligations, there is a legitimate interest in us sharing this information.

We share your personal data with the following parties:

- **The Plan's administrator:** who is responsible for the day-to-day administration of the Plan on our behalf.
- **The Plan sponsor:** who has ultimate responsibility for the Plan.
- **Legal, actuarial or other professional advisors:** including legal advisors, the Plan auditors, investment advisors, accountants and actuaries.
- **Other service providers and advisors:** such as companies that support our IT, help us analyse the data we hold, send communications to Plan members or generally help us deliver our services to you.
- **Any third party necessary for the administration and management of the Plan:** for example, your bank to pay benefits to you or your Plan employer to carry out studies, projects, transfers, valuations, commutations and other exercises.
- **Authorised third parties:** for example, where you authorise us to provide information to someone e.g. your independent financial advisor, or where we are legally obliged to provide information, e.g. to an ex-spouse based on a court order.
- **Any trustees who replace us:** if we cease to be the trustee of the Plan for any reason your data will need to be shared with our replacement for the ongoing administration and management of the Plan.
- **The Government and relevant regulators:** where we are required to do so by law or to assist with their investigations or initiatives, including but not limited to the Financial Conduct Authority, the Pensions Regulator, the Pensions Ombudsman, the Pensions Advisory Service, HMRC and the Office for National Statistics.

This list is not exhaustive and from time to time we may need to share data with other organisations in order to administer the Plan.

Some of these third parties may also be data controllers under data protection law. In particular, the Plan actuary will be regarded as a data controller in respect of the performance of certain statutory functions in relation to the Plan.

International transfers of personal data

The personal information we collect in relation to the Plan is primarily held and processed within the UK. From time to time, the Plan administrators or other organisations we share this information with might share your personal data with operations outside the UK in order to assist with the running of the Plan. This would only be to organisations that are either in the European Economic Area (and so have the same data protection laws as in the UK) or to other countries where comparable protections are in place, as required under the UK's data protection laws.

How long do we keep personal information for?

We will keep your personal information for as long as you remain a member of the Plan or as long as we are paying benefits or holding investments in relation to your pension. This can be for a considerable time and extend after you have passed away where the Plan is paying benefits to your dependants or beneficiaries. After that period of time we will keep your personal information for a reasonable period to maintain our records and in case of any legal disputes. We generally keep records for a period of 12 years after you cease to be a member of the Plan or we cease paying benefits or holding investments in relation to your pension.

Your rights in relation to your personal information

You have a number of rights in respect of your personal information. In particular:

- You have the right to see the personal data that is held about you and have a copy of this information provided.
- If at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected.
- You can request to have your personal data erased in certain limited circumstances.
- You can require us to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us.

More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

If you wish to see your personal data, exercise any of the rights mentioned above or make a complaint about how we have handled your personal data, please contact us using the details below.

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Hartwell House
Victoria Street
Bristol
BS1 6AD

Email: JDEUKPP.admin@barnett-waddingham.co.uk.

Telephone: 03442 640175

You should, however, be aware that taking any of the above steps could impact on the payment of your benefits and our ability to answer questions relating to your benefits. Please note that in certain circumstances, we can override your request to take any of the above steps.

Complaining to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office on 0303 123 1113. However, we are here to help and would encourage you to contact us to resolve your complaint first.

Changes to this notice

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

Jacobs Douwe Egberts UK Pension Trustee Limited
Trustee of the Jacobs Douwe Egberts UK Pension Plan
Version dated: January 2022