

# Privacy Notice

The Trustee of the MMC UK Pension Fund (the “**Fund**”, “**we**”, “**our**” or “**us**”) is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on what personal information about you the Fund collects, what we do with this information, the lawful basis on which personal information is processed and what rights you have.

## Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone number, e-mail address, national insurance number, bank account details (in some cases), marital status, dependants and country of residence;
- information relating to your benefits such as your member identifying number (which is assigned to you by the Fund), the date you joined or left the Fund, your earnings and pensionable earnings, details of your employment with any entity in the MMC group (such as your employer’s name and dates of your employment), contributions you have paid to the Fund, the category and value of benefits that you have built up or receive, and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders (including information in divorce or dissolution certificates), tax protections or other adjustments;
- records of communications with you (including any complaints); and
- in some cases, special categories of personal data such your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin (for example, when you submit an expression of wish form). Before providing us with any such information, you should provide a copy of the information in this notice to those individuals. We assume that you have the authority to share any personal information you provide to us about them.

In some cases, we will collect personal information about you indirectly from the MMC group entity which is (or was) your employer and from our service providers (e.g. the Fund administrator, which is currently Mercer).

Finally, Mercer (in its capacity as Fund administrator) may collect personal data from you as part of the log on details required for you to access OneView. This information is not shared with the Trustee.

## 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 plans;
- b. for general administration of the Fund, such as: to record and pay benefits; for actuarial valuations; for electing member nominated trustee directors; for providing you with news about the Fund; for reviews we or our administrators conduct for statistical and reference purposes; and for other administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you and 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 Fund; and
- e. when we undertake activities from time to time to help us manage the liabilities of the Fund, such as obtaining life insurance, longevity hedging, insuring Fund liabilities with an insurer, fund mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises, 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. necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make disclosures to the MMC group for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of the MMC group, such interests in each case not being overridden by your privacy interests;
- ii. in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below; or
- iii. in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims or, where the processing relates to personal data, manifestly in the public domain;
- iv. 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 allocate benefits or where the Fund rules require you to provide information which we cannot otherwise process without your consent.

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 administer your contributions and benefits or record or calculate or pay your or your beneficiaries' benefits.



## Disclosures of your information

We typically share your information with the following recipients:

- our suppliers, including MMC, and other providers of services to us. These suppliers include:
  - administrators (Mercer), which in turn may share your personal information with its sub-contractors, such as payroll providers (to record and pay benefits), providers of printing and communication services, and providers of IT, hosting, marketing, and tracing services;
  - providers who invest your additional voluntary contributions (Mercer, Prudential, Equitable Life, Aviva, Standard Life and Zurich);
  - Financial advisers (to provide you with financial advice);
- our professional advisers to obtain actuarial advice (currently Jenny Condrin in her role as Scheme Actuary and Mercer Limited), legal advice (currently Linklaters LLP), investment advice (currently Mercer Limited) and audit services (currently Deloitte);
- the MMC group, such as for audit purposes, or in relation to corporate transactions or exercises (such as pension increase exchange exercises) initiated by the MMC group;
- any new pension provider you select, if requested to do so by you;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above. In particular, the Trustee provides personal data to Zurich which provides death in service cover for the Fund. The Trustee also shares your information with buy-in insurers from time to time, such as Prudential in respect of the JLT Section. In addition, the Trustee has entered into several transactions under which

the Fund's longevity risk is insured. In this context, the Trustee discloses personal data about those individuals receiving pensions from the Fund whose benefits are insured by Fission Alpha IC Limited, Fission Beta IC Limited and Fission Gamma IC Limited (which are Guernsey companies owned by the Trustee and which act as insurers); and The Canada Life Assurance Company (acting through its Barbados branch), The Prudential Insurance Company of America and Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft In München (acting through the Munich Re Company UK Life Branch), each of which acts as reinsurer.

- 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. This may include the Pensions Regulator, HM Revenue & Customs and the Department for Work and Pensions; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or 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 may include the police or by order of the court if, for example, there is suspected or actual criminal activity involving the Fund.

When we share information with any of these recipients, we take steps to ensure they: (a) comply with applicable data protection laws; and/or (b) provide us with contractual assurances that they will implement appropriate security measures and only follow our instructions when processing your data; and/or (c) meet our data security standards.

## Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict its processing, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party. To the extent the use of your information is based on your consent, you have the right to withdraw your consent.

You also have the right to object to our processing of your personal data.

If you have any questions or wish to exercise any of the above rights, or if you wish to make a complaint about how we process your information, please contact the Fund Administrators:

By Post: MMC UK Pensions Arrangements, Maclaren House, Talbot Road, Stretford, Manchester M32 0FP

Telephone: **0330 100 3597**

Online: [contact.mercer.com](https://www.contact.mercer.com)

You can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office ([www.ico.org.uk](https://www.ico.org.uk)).

## Transfers of your information abroad

The use and disclosure of your information for the purpose referred to in (e) above (in particular in relation to the longevity risk transaction undertaken by the Trustee) may involve transferring your information to countries outside of the United Kingdom and the European Economic Area. Those countries include Guernsey, Barbados and the United States of America. Finally, Mercer (in its capacity as administrator of the Fund) uses Mercer India Private Limited to undertake some processing of personal data, and in this context personal data is transferred to India.

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 will ensure that the transferred information is protected in compliance with applicable data protection rules. To ensure an appropriate level of protection, we typically use 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 are available from us on request.

Mercer (in its capacity of administrator of the Fund) uses the MMC group's safeguards known as binding corporate rules where it is transferring information to relevant affiliates (including to Mercer India Private Limited). Binding corporate rules are required to be approved by data protection authorities in the United Kingdom or the European Union (as applicable), to ensure they provide an adequate level of protection (including in relation to international transfers) – the MMC group's binding corporate rules were formally approved by the Information Commissioner's Office, the local data protection authority in the United Kingdom, on 6 October 2017.

## Retention of your information

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 policy. We will determine the period envisaged within such documentation with regard to the Fund'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 Fund; and responding to legal claims or regulatory requests. In many cases, we will keep your information for 12 years after your death, or after the death of any person whose claim to benefits arises because of your membership of the Fund

### 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.

### Status of this privacy notice

This privacy notice was last updated in September 2023.

This document is a notice to you and not a contract between us. It may be subject to amendments. Any future changes or additions to the processing of personal data (as described above in this privacy notice) which affect you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

**The Trustee of the MMC UK Pension Fund**

## Munich Re UK Life Branch - Information Notice

This information notice is designed to help you, the policyholder (or a covered person or beneficiary) under an insurance policy issued by a customer (your “insurer”) of Munich Re UK Life Branch , to understand how we process your personal data we may receive from your insurer.

Whilst you will not have purchased insurance directly from us, the insurer is a client of ours through a reinsurance contract under which the relevant policy is reinsured to us and you become a client of ours through this reinsurance arrangement.

Note that where you are a covered person or beneficiary (rather than yourself a policyholder) references in this Information Notice to ‘your policy’ shall mean the policy in respect of which you may be covered.

The reinsurance arrangement may require the sharing of your personal data with us, even if you may not have direct contact with us. We may also have to share some of your personal data with other parties under retrocession agreements or statutory obligations.

<b>The Data Controller for Munich Re UK Life Branch is:</b>
Munich Re UK Life Branch 10 Fenchurch Avenue London EC3M 5BN Tel: +44 (0) 20 3003 7000 Fax: +44 (0) 20 3003 7010 <a href="https://www.munichre.com/uk-life/en.html">https://www.munichre.com/uk-life/en.html</a>

**The Data Protection Officer / Expert for Munich Re UK Life Branch is:**

The Data Protection Officer / Expert  
Munich Re UK Life Branch  
10 Fenchurch Avenue  
London  
EC3M 5BN  
Tel: +44 (0) 20 3003 7000  
Email: [p0060010222@munichre.com](mailto:p0060010222@munichre.com)

Please contact the Data Protection Officer if you have questions concerning this Information Notice or your Data Subject Access Rights. These include:

- Data Portability: The transfer of your personal data to another Data Controller.
- Erasure: To have your personal data removed or deleted.
- Rectification: To have your personal data corrected if it is inaccurate.
- Restrict Processing: To restrict processing where your personal data is inaccurate or the processing is unlawful.
- Subject Access Request: To access your personal data and information around its processing.
- To object to direct marketing (we do not do direct marketing).

If you are unhappy with any response or have a complaint. You can raise this with:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: +44 (0) 303 123 1113

## Who your data is shared with

The following are data controllers that we share your personal data with:

- Retrocessionaires – that we retrocede to.
- Brokers – that have advised you of insurance products.
- Government Agencies.
- Legal Advisers.

The following are data processors that we disclose your personal data to:

- Third Parties providing services for Banking, Claims Handling, Medical Professionals, Insurance Administration and IT Services.

Please contact the Data Protection Officer ([p0060010222@munichre.com](mailto:p0060010222@munichre.com)) if you require further information on who your data is shared with.

## What information about you we may collect and process

### Personal Data

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Individual Information	Name, address, marital status, date and place of birth, nationality, employer, job title, employment history, family details and their relationship to you.	Insurance companies or other insurance market participants. Your family. Your employer.	Group companies. Anti-fraud databases. Medical doctors and specialists. Retrocessionaires and other reinsurers.	Setting you up as a client including checks for potential fraud, sanctions, credit and anti-money laundering. Underwriting, evaluating and pricing of the risks to be insured and calculating and validating the reinsurance premium for your policy.	Performance of the insurer's contract with you or, if such a contract does not exist, legitimate interest between reinsurance and insurance companies.

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Potential purpose of processing	Lawful basis of processing
Policy Information	Information about the quotes and insurance policies you have applied for or taken out.	Insurance companies or other insurance market participants. Your family. Your employer.	Group companies. Anti-fraud databases. Retrocessionaires and other reinsurers.	Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating and validating the reinsurance premium for your policy and calculating experience analysis. Aggregation of risk.	Performance of the insurer's contract with you or, if such contract does not exist, legitimate interest between reinsurance and insurance companies.
Financial Information	Premiums and claims paid on your policies. Income and other financial information.	Insurance companies or other insurance market participants. Your family. Your employer.	Group companies. Anti-fraud databases. Retrocessionaires and other reinsurers.	Managing you as a client including underwriting; evaluating and pricing the risks to be insured and calculating and validating the reinsurance premium for your policy. Aggregation of risk.	Performance of the insurer's contract with you or, if such contract does not exist, legitimate interest between reinsurance and insurance companies.
Statutory and anti-fraud information	Sanctions and information from anti-fraud databases concerning you.	Insurance companies or other insurance market participants. Member of your family; Your employer; Anti-fraud databases, sanctions lists, court judgements and other government agencies.	Group companies. Anti-fraud databases.	Setting you up as a client including checks for potential fraud, sanctions, credit and anti-money laundering. Managing you as a client including underwriting, evaluating and pricing the risks to be insured and calculating and validating the reinsurance premium for your policy.	Performance of the insurer's contract with you. Compliance with a legal obligation.
Claim Information	Information about previous and current claims.	Insurance companies or other insurance market participants. Member of your family. Your employer. Anti-fraud databases; claimants, defendants, witnesses, experts incl. medical experts, loss adjustors, solicitors and claims handlers.	Group companies. Anti-fraud databases. Medical doctors and specialists. Retrocessionaires and other reinsurers.	Managing insurance and reinsurance claims. Defending of legal claims. Investigating or prosecuting fraud.	Performance of insurer's contract with you. Compliance with a legal obligation. Processing is necessary for the defence of legal claims.

## Special Categories of Personal Data

Categories of data	Type of information processed	Where the data may come from	Who we may disclose the data to	Purpose of processing	Lawful basis of processing
Individual and claim Information	Gender and health information. Medical reports. Criminal records and convictions.	Insurance companies or other insurance market participants. Member of your family. Your employer.	Group companies. Anti-fraud databases. Medical doctors and specialists. Retrocessionaires and other reinsurers.	Setting you up or managing you as a client.  Evaluating and pricing the risks to be insured and calculating and validating the reinsurance premium for your policy if it is a health or life insurance policy.	Performance of the insurance contract with you or consent  Processing is necessary for the defence of legal claims.
Statutory and anti-fraud information	Criminal records and convictions. Surveillance reports.	Insurance companies or other insurance market participants. Member of your family; Your employer; Anti-fraud databases, sanctions lists, court judgements and other government agencies.	Group companies; Anti-fraud databases; Medical doctors and specialists.	Setting you up or managing you as a client  Evaluating and pricing the risks to be insured and validating any appropriate premium where there is health or life insurance, including checks for potential fraud, sanctions, anti-money laundering and other statutory checks.	Processing carried out under the control of official authority.  Processing is necessary for the defence of legal claims.

## Protection of your information

Your privacy is important to us and we follow strict security and organisational procedures in the processing, storage, destruction and disclosure of your information. This is to prevent unauthorised access or loss of your information.

## Use of Your Consent to Process Special Category of Personal Data

In order to provide insurance, in certain circumstances we may need to process special categories of personal data, such as medical records or criminal conviction data.

We follow the lawful basis that your insurer has used in processing and disclosing your special categories of personal data to us. This may be for the performance of the insurance contract or consent. If consent is used, you will not have given your consent directly to us but to the insurer that you purchased your policy from (or, if applicable, to a third party which has purchased insurance under which you are a covered person or beneficiary).

You may withdraw your consent for us to process your special categories of personal data at any time by contacting the Data Protection Expert (details as above). However, if you withdraw your consent this will impact on our ability to provide or continue to provide reinsurance for your insurance policy or pay claims.

## Call Monitoring and Recording

For quality control purposes and to audit the evaluation process for the underwriting and pricing of the risks to be insured, we may (if applicable) review copies of telephone recordings made with the insurer.

## Data Retention

Your personal data will only be kept for as long as it is necessary for the purpose it was collected for.

Category of data	How long we retain your data
Individual information	7 years after the end of the reinsurance agreement between us and your insurer.
Policy information	7 years after the end of the reinsurance agreement between us and your insurer.
Financial information	7 years after the end of the reinsurance agreement between us and your insurer.
Claims information	7 years after the end of the reinsurance agreement between us and your insurer.
Special categories of personal data (underwriting and pricing) where the policy did not come in force	1 year after the quote decision.

Category of data	How long we retain your data
Special categories of personal data (underwriting and pricing) where the policy became in force	7 years after establishing the policy in force.
Special categories of personal data (claims)	7 years after the end of the reinsurance agreement between us and your insurer.

## Transfer of Data

We will not transfer your personal data outside the UK or EEA where there is not an adequate level of data protection.

Your personal data may be disclosed to companies within our Group or to Service Providers outside the UK or EEA. However, we ensure that there is an adequate level of data protection in place and adhered to by these parties.

You can find out the details about any other party we have shared your personal data with by contacting the Data Protection Officer at the address provided at the top of this information notice.

## Changes to this Munich Re UK Life Branch Information Notice

If we make changes to this information notice, the revised information notice will be published on our website.

## Canada Life Privacy Notice

Form of Data Protection Notice MMC UK Pension Fund Trustee Limited ("**MMC**") will need to transfer certain personal data (including your postcode, date of birth, gender, marital status and information relating to your status as a beneficiary of any pension scheme managed by MMC) that you have provided to MMC to The Canada Life Assurance Company ("**Canada Life**"). Canada Life is a provider of life insurance and reinsurance services and will, by entering into a contract with a Guernsey insurer that MMC has selected, provide protection against the risk that MMC is required to pay certain pension benefits for longer than MMC has projected, such protection being in connection with the scheme of which you are a beneficiary. You acknowledge that Canada Life will process your personal data for the purposes of administering the contracts connected with the protection provided to MMC, to allow Canada Life to improve its models of UK longevity and mortality risk, and in connection with group reporting and may also disclose your personal data to its affiliates, including Canada Life Group Services Limited, which carries out administration services on behalf of Canada Life, and pass the risk it has assumed onto other insurance or reinsurance companies that are notified to you by or on behalf of Canada Life from time to time. Canada Life will act as a data controller of any personal data that it receives from MMC to process in manner described in this notice and may process such personal data outside of the EEA.

You acknowledge that:

(a) Canada Life may use and otherwise process your personal data in the manner and for the purposes described above; and

(b) Canada Life may disclose your personal data to its affiliates and other insurance or reinsurance companies as described above,

for the legitimate interests of Canada Life and those of its affiliates and other insurance or reinsurance companies, namely to allow it to properly administer the contracts connected with the protection provided to MMC, to allow it to improve its models of UK longevity and mortality risk, and in connection with group reporting.

If you have any questions about Canada Life's use of your personal data or if you wish to exercise any of your rights under applicable data protection legislation (including but not limited to your right to request: (i) a copy of the personal data that Canada Life holds about you; (ii) that Canada Life corrects any inaccuracies in such personal data; and/or (iii) that Canada Life stops processing your personal data in the manner described in this notice), please contact MMC by phone (+44 (0)330 100 3597), email ([mmcpensions.uk@mercer.com](mailto:mmcpensions.uk@mercer.com)) or by writing to MMC UK Pension arrangements, PO Box 476, Westgate House, 52 Westgate, Chichester, PO19 3WZ, UK, who will be able to communicate this request to Canada Life. You can also access further information about the processing of personal data by Canada Life at <http://www.canadalifere.com/data-privacy-notice.html>.

October 2023