

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 John Bannister in his 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. In addition, the Trustee has entered into a transaction 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 and Fission Beta IC Limited (both of which are Guernsey companies owned by the Trustee and which act as insurers); and The Canada Life Assurance Company (acting through its Barbados branch) and The Prudential Insurance Company of America, 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.

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 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 European Union, 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. 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

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
PO Box 476
Westgate House
52 Westgate
Chichester
PO19 3WZ

Telephone: 0330 100 3597

Email: mmcpensions.uk@mercerc.com

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

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 May 2018.

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