

# Privacy Notice

## 1. Introduction and General Terms

(a) This Privacy Notice sets out how ICI Pensions Trustee Limited, the Trustee of the ICI Pension Fund, (“Trustee”, “we”, “us”, “our”) obtains, uses and protects any personal information that you provide to us, or that is otherwise obtained or generated by us, and which relates to you or to any individual connected with you.

(b) This Privacy Notice explains the following:

- Paragraph 2 – what personal information we may collect about you;
- Paragraph 3 – how we keep your personal information safe including when we transfer it across borders;
- Paragraph 4 – what we may use your personal information for;
- Paragraph 5 – how long do we retain your records;
- Paragraph 6 – who we may share your personal information with;
- Paragraph 7 – your rights regarding the personal information you provide to us;
- Paragraph 8 – what if you do not provide us with your personal information;
- Paragraph 9 – technical information that we may collect about you;
- Paragraph 10 – how we make changes to our data protection policy; and
- Paragraph 11 – how to contact us.

(c) The data controller is ICI Pensions Trustee Limited of 5th Floor, 36-38 Botolph Lane, London, EC3R 8DE, registered number 2512713.

## 2. Personal Information we may collect about you

What types of personal information may we collect about you?

(a) Personal information broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual. This would therefore include any information provided to us in relation to your or another's actual, past or potential membership of the ICI Pension Fund (the “Fund”).

(b) We may hold any or all of the following personal information about you:

- personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number, description of physical or mental health and identifiers such as National Insurance number and your employee number;
- family, lifestyle and social circumstances such as details about your current marriage, civil partnership or relationship status, marital or relationship history, details of your family, spouse, partner, dependents and potential dependents, and persons who we may contact in the event we are unable to contact you;
- details of your legal or personal representatives and the executor and beneficiaries of your will;
- employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, attendance record, health and safety records, security records, job title and job responsibilities;
- financial details such as you or your family members' or dependant's income, salary, assets and investments, bank account details to process pension payments, state benefits, grants and insurance details; and
- technical information and other information about your visits to our website – you can find more information about this in paragraphs 9 and 10, below.

We may also process other information about you which reveals information about your health status and gender status, such as information related to your physical or mental health, including the provision of health care services (“Sensitive Information”). Where we collect these types of information about you (for example, in the event of your application for an ill-health pension, our review of a pension in payment, or your application for a serious ill-health lump sum), we are permitted to use this information without your consent on the basis of the exemption set out in paragraph (1) of Schedule 1 to the Data Protection Act 2018.

How do we collect personal information about you?

(c) We collect your personal information when you, your employer, a member of the Fund or another person contacts us online, by phone, text, email or post. We obtain your personal information where this is provided through any other engagement or correspondence that you, your employer, a member of the Fund or another person may have with us. We may also obtain your personal information through the use of third party tracing services where we believe that we hold inaccurate data for you. We may also obtain data from a variety of other sources including public databases, our advisers and government or regulatory bodies.

### 3. Keeping your personal information safe

Password protection

(a) Where we have given you (or where you have chosen) a password which enables you to access the ePA (the Fund administrator's online administration site), you are responsible for keeping such password confidential. We ask you not to share the password with anyone. The ePA system has minimum password requirements which you will need to comply with. HM Government's National Cyber Security Programme recommends making your password stronger by using three random words, and numbers/symbols if needed. Please avoid using the same password for multiple online accounts.

(b) If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security.

Transfers of your personal information

(c) We may transfer, store, or process your personal information at a destination outside the **United Kingdom (UK)**. Where the countries to which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of the UK, we will take reasonable steps to ensure that your personal information is treated securely and in accordance with this data protection policy. This may include entering into data transfer agreements based on the model clauses approved by the European Commission, to ensure that third parties to whom we transfer personal information in those countries nevertheless commit to ensuring an adequate level of protection for your personal information (further information on the model clauses can be found on the following website: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en))

(d) Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the safety of your personal information transmitted to our website; any transmission is at your own risk. Once we have received your personal information, we will use reasonable procedures and security features to try to prevent unauthorised access.

### 4. What we may use your personal information for

(a) The Trustee may use your personal information for the following purposes:

- to administer the Fund including to process data to calculate and pay benefits;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with information, benefits and services;
- in connection with the purchase of Fund investments, such as "buy-in" agreements with insurance companies;
- in relation to any correspondence related to the administration of the Fund (including queries relating to your membership of the Fund, communications with nominated or appointed Trustees and communications when we are unable to contact members of the Fund);
- to notify you about our services and changes to our services;
- for statistical, financial modelling and reference purposes;
- for internal record keeping;
- risk management including credit risk analysis, know-your-client and anti-money laundering checks;
- complying with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving the Fund;

- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries; and
- to process Trustee nominations.

(b) We process your personal information for the purposes described in paragraph 4(a) on the grounds that processing is necessary for compliance with a legal obligation to which we are subject and/or it is in our legitimate interest to do so including:

- so that we can provide any clarification or assistance in response to your communications;
- to serve you better as a Fund member;
- so that you are aware of your benefits and entitlements;
- to comply with our legal obligations relating to record retention;
- so as to ensure that we pay the correct benefits at the correct time;
- to manage the risks to the Fund so that we can help to make your pension safe;
- to comply with all laws, guidance and codes that apply to us, as well as with data requests from regulators, governments, courts and law enforcement authorities;
- to comply with our legal obligations in connection with the Fund;
- to try to minimise any disruption to the Fund if there is ever a change to our business; and
- to be able to monitor the way in which our website is used, as this will help us to improve your experience on this website.

(c) In relation to bulk annuity “buy-in” policies held by the Trustee or further policies under consideration, the insurers may process your data for internal compliance and business administration purposes; to fulfil their obligations under the policy, any re-insurance policy or hedging contract; and for statistical, financial modelling and reference purposes to the extent permitted by applicable law. The insurers may need to disclose your data to members of its group for those purposes, but will only do so on a strictly “need-to-know” basis and in such a way as to preserve its strictly confidential nature. Data may also be transferred to re-insurers that the insurers work with. Where appropriate, this may involve data being transferred outside the UK for the purposes outlined in this paragraph. If your personal data is transferred in this way the insurers will ensure it is protected in accordance with the legal requirements of the General Data Protection Regulation (EU) 2016/679 (**GDPR**) (as it forms part of retained EU law under the European Union (Withdrawal Act) 2018) and Data Protection Act 2018 or other applicable legislation.

## 5. How long do we retain your records

We will hold your personal information (and any personal information collected in respect of any individual connected with you) on our systems for as long as you or your family or dependants are receiving benefits from the Fund, and subsequently for such period as the Trustee may from time to time consider appropriate. As of 25 May 2018, the Trustee has decided it is appropriate to retain all personal data on an indefinite basis.

## 6. Who we may share your personal information with

(a) We may share or disclose your personal information to any of the following recipients:

- the sponsoring employers and the counterparties to the Fund's investments;
- in certain circumstances, your data may be passed to the scheme actuary and Fund's administrator, Willis Towers Watson, (whose data protection policy is available at <http://www.willistowerswatson.com/personal-data>). The scheme actuary and/or Willis Towers Watson may be data controllers or joint data controllers in this capacity;
- our service providers and professional advisers (such as our legal advisers), who may also be data controllers in this capacity, including those listed below:
  - Allen & Overy (whose privacy policy is available at <http://www.allenoverly.com/legal-notice/Pages/Privacy-policy.aspx>),
  - Squire Patton Boggs (whose privacy policy is available at [www.squirepattonboggs.com](http://www.squirepattonboggs.com)),
  - CMS (whose privacy policy is available at <https://cms.law/en/GBR/Footer-Configuration/Privacy-Policy>), and
  - DLA Piper (whose privacy policy is available at <https://www.dlapiper.com/en/uk/privacy-policy/>),

- and auditors (who may also be data controllers in this capacity, being KPMG, whose privacy policy is available at <https://home.kpmg.com/xx/en/home/misc/privacy.html>));
- local or foreign regulators, governments and law enforcement authorities;
- local and foreign courts, tribunals and arbitrators or other judicial committees;
- insurance companies (such as Legal & General (whose privacy policy is available at <https://www.legalandgeneral.com/privacy-policy/>), Scottish Widows (whose privacy policy is available at [http://www.scottishwidows.co.uk/global/legal\\_and\\_privacy\\_notice.html](http://www.scottishwidows.co.uk/global/legal_and_privacy_notice.html)) and M&G (whose privacy policy is available at <https://www.mandgplc.com/site-services/privacy-policy> )) and their reinsurers;
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving the Fund (including any potential or actual purchaser and their advisors); and
- a person appointed to act on your behalf by The Department of Work and Pensions, by the Court of Protection, under a power of attorney, or the Fund's internal process.

(b) From time to time, our website may contain links to other websites, including of our partner organisations and advertisers. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these organisations or their activities. Please check these policies before you submit any personal information to these websites.

## 7. Your rights regarding the personal information you provide to us

(a) The nature and accuracy of the information we hold about you is important to us. You have the right, in accordance with the law:

- to request information regarding the processing of your personal information, including to be provided with a copy of your personal information;
- to request the correction, completion and/or deletion of your personal information;
- to restrict the processing of your personal information;
- in relation to personal information processed on the grounds of (i) being necessary for performance of a task carried out in the public interest or in the exercise of official authority vested in the Trustee or (ii) legitimate interest of the Trustee or third party, or where personal information is processed for direct marketing, object to the processing of your personal information;
- to request to obtain and reuse your personal information for your own purposes across different services where that personal information is processed by the Trustee by automated means and based on consent; and
- to complain to your local data protection authority (the Information Commissioner's Office in the UK), or to a court of law, if your data protection rights are violated. You may be entitled to claim compensation as a result of unlawful processing of your personal information.

(b) If you would like to exercise any of your rights described above, please let us know by emailing us at [ici@willistowerswatson.com](mailto:ici@willistowerswatson.com).

## 8. What if you do not provide us with your personal information

We may not be able to perform actions necessary to achieve the purposes set out above and you may not be able to make use of the services offered by us if you do not provide us with the personal information that we may need to comply with our statutory or contractual obligations, as set out in the paragraph 4, above.

## 9. Technical information that we may collect about you

(a) When you visit our website, we may collect technical information about your computer, such as your browser type and version, browser plug-in types and versions, operating systems and platforms. We may also collect information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, length of visits to certain pages, page interaction information (such as clicks) and methods used to browse away from the page.

(b) You can find more information about the types of technical information that we collect about you in our Cookies Policy (which can be found at <https://www.icipensionfund.org.uk/cookies/>).

## 10. Changes to our Privacy Notice

Any changes we make to our data protection policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Notice. Any changes to this Privacy Notice will become effective when we post the revised Privacy Notice on our website. The date of the most recent revisions will appear on this page. Your use of the website or continued participation in the Fund following these changes means that you accept the revised Privacy Notice.

## 11. Contact

If you have any questions, comments or requests regarding any aspect of this Privacy Notice, please do not hesitate to contact us at:

ICI Pensions Services  
PO Box 545  
Redhill  
Surrey  
RH1 1YZ

Phone: 0800 916 8021  
Email: [ici@willistowerswatson.com](mailto:ici@willistowerswatson.com)