

## Kellogg's (Great Britain) Pension Fund

### Fair Processing Notice

#### What is the purpose of this notice?

This notice has been produced for members of the Kellogg's (Great Britain) Pension Fund (the "**Fund**").

The trustee of the Fund, Kellogg's (Great Britain) Pension Trustee Limited (the "**Trustee**") holds and processes personal data about you and (if applicable) your spouse and dependants. This data has been obtained either from you or others such as your spouse or dependants or your employer. The Trustee may also obtain personal data about you / your spouse and dependants from publicly accessible sources, for example, the General Register Office.

This data is held so that the Trustee can operate and administer your benefits under the Fund in accordance with its legal obligations. This means that the Trustee is a 'data controller' under data protection legislation, and has to provide you with certain information, which is set out in this notice.

#### What data does the Trustee hold about me?

The data held by the Trustee includes your name, gender, date of birth, NI number, address, marital status, employment information and (where your pension under the Fund is in payment) bank details. In certain circumstances the Trustee may also need to request and process more sensitive personal data about you. This could include medical information if you wish to take your benefits under the Fund early due to ill health, or information which would help the Trustee pay benefits under the Fund. The Trustee needs to hold and process this information to comply with its legal obligations and duties under the trust deed and rules governing the Fund. The Trustee relies on a variety of different bases to lawfully process this information, including to enable it to perform its legal obligations under employment, social security and social protection law.

#### Does anyone else aside from the Trustee hold this data?

Your data is held by the Fund's administrators, currently Barnett Waddingham LLP ("**Barnett Waddingham**") for the defined benefit section ("**DB Section**") of the Fund and Aviva Life & Pensions Limited ("**Aviva**") for the defined contribution section ("**DC Section**") of the Fund. Barnett Waddingham and Aviva are responsible for administering the Fund on behalf of the Trustee. If you are a member of the DB Section of the Fund and you have made additional voluntary contributions to the Fund, then your data may also be held by either the Prudential Assurance Company Limited or Aviva. Kellogg UK Holding Company Limited (as the sponsoring employer of the Fund) also holds some of your data as part of the general administration of the Fund.

Additionally, in order to operate and administer your benefits in the Fund, the Trustee may need to disclose your data to other people. This includes the Trustee's professional advisers, Kellogg UK Holding Company Limited and other companies in the Kellogg group, insurance companies to arrange particular benefits (for instance, life assurance cover or to secure your Fund benefits under an annuity policy), regulatory authorities, receiving pension schemes (if you request to transfer your benefits) and other service providers appointed by the Trustee.

The Trustee may need to transfer your data from the UK to countries that are outside the European Economic Area ("**EEA**") if this is how the Trustee's service providers process your personal data. The Trustee will only transfer your data outside the EEA where either:

1. the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your data; or

2. the Trustee has put in place sufficient measures to ensure adequate security as required by data protection law. These measures include putting in place appropriate contractual protections consistent with data protection laws. You can find out more about these safeguards by visiting the Information Commissioner's Office ("**ICO**") website at [www.ico.org.uk](http://www.ico.org.uk) and searching for 'International transfers'.

### **How long will this data be held for?**

Due to the long term nature of the Fund, the Trustee will continue to hold your data indefinitely. This ensures that the Trustee is able to answer queries about how your benefits were dealt with (which could be made many years after your benefits were paid in full). Any processing of your data once all your benefits have been paid in full (or secured with an insurer under an annuity policy, if earlier) will only take place where strictly necessary.

### **Who should I contact if I need to update my details?**

It is important to inform the Trustee of any changes in your personal details to ensure the information held is kept accurate and up to date.

If you are a member of the **DB Section** of the Fund and you wish to update any of your personal details, please contact **Barnett Waddingham** as follows:

Telephone: 0333 11 11 222

Email: [Kelloggs.members@barnett-waddingham.co.uk](mailto:Kelloggs.members@barnett-waddingham.co.uk)

If you are a member of the **DC Section** of the Fund and you wish to update any of your personal details, please contact **Aviva** as follows:

Telephone: 0345 600 6303

Email: [mymoney.questions@aviva.com](mailto:mymoney.questions@aviva.com)

### **Who should I contact if I want to know more?**

If you want to know more about the information held in connection with your membership of the Fund, or the purposes for which it is held, please contact the Kellogg's Pensions Team using the below contact details:

Email: [europaen.pensions@kellogg.com](mailto:europaen.pensions@kellogg.com)

### **What control do I have over my data?**

You are entitled to request access to or rectification of any personal data being held by or on behalf of the Trustee.

The provision of your personal data is not a requirement of any contract or legislation, and you are not obliged to provide the Trustee with personal data. However, if you do not provide the Trustee with personal data, the Trustee would be unable to administer your benefits in the Fund.

## **What if I have a complaint?**

If you have a complaint about the Trustee's management of your data, you have the right to lodge a complaint with the ICO, which can be contacted on 0303 123 1113 or via other methods of communication as explained on their website (currently <https://ico.org.uk>).