

## **DU PONT (U.K.) LIMITED PENSIONS FUND**

### **PRIVACY NOTICE**

This Privacy Notice has been issued by Du Pont U.K. Trustees Limited (the "**Trustee**"), the trustee of the Du Pont (U.K.) Limited Pensions Fund ("**Fund**"), to comply with the General Data Protection Regulation (EU) 2016/679 ("**GDPR**"), which came into effect on 25 May 2018, as it now forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018, and other data protection legislation. This updated Privacy Notice was issued in September 2021 and replaces any Fair Processing Notice issued under the Data Protection Act 1998 and the Privacy Notices issued by the Trustee in May 2018 and November 2018.

The Trustee is committed to keeping your personal information secure. We set out below further details of our data protection and privacy policy.

This Privacy Notice applies to all Fund members and third parties whose information you provide to us in connection with the Fund (for example, details of relatives or beneficiaries). This Privacy Notice does not form part of the Fund's rules or place any contractual obligation on the Trustee.

#### **Privacy policy**

##### **1. WHERE WE OBTAIN YOUR INFORMATION**

In the course of administering your pension, we may hold information about you which is provided by you, your employer or former employer, other pension schemes, the Fund Actuary or Fund Administrator, or medical advisers.

The information we hold includes your name, address, email address, phone number, date of birth, gender, NI number, salary details, bank details, employment history, periods of Fund membership and possibly details of other pension arrangements that you have e.g. in relation to transfers in and out of the Fund. We may also hold information about your spouse or civil partner, dependants or other potential beneficiaries, and we may hold sensitive personal information e.g. health information, membership of trade unions, race, religion or sexual orientation.

##### **2. HOW WE USE YOUR INFORMATION**

Your information will be used to administer your pension benefits and for related activities. In particular, we will use the information to:

- calculate your benefits, including online calculations that you request;
- identify what benefits are, or might be, payable to you or, in the event of your death, any beneficiaries;
- deal with any queries or disputes you may have about your benefits;
- communicate with you by electronic means, including online, by post or by other means to keep you updated on matters related to the Fund;
- make insurance arrangements in respect of the Fund, including de-risking and bulk insurance transactions and other relevant liability management exercises with insurers, risk-transfer providers or other third parties in respect of the Fund;

- provide you with information about your benefits and options available to you.

### 3. WHY WE USE YOUR INFORMATION

The law requires that the Trustee only uses your personal data for defined lawful purposes.

We will only use your data where:

- it is necessary to comply with our legal and contractual obligations as Trustee, e.g. to pay your benefits as they fall due;
- it is necessary to protect your interests, e.g. if we need to let you know about benefit options; or
- it is in the legitimate interests of the Trustee to use your data in that way, and in doing so we are not breaching your rights, e.g. any of the uses referred to above.

The processing of special categories of data (such as health information) will be justified by one of the conditions above, and on such additional basis as required by the GDPR and/or the Data Protection Act 2018. Where we process special category data on the basis of your consent, you will have the right to withdraw that consent at any time but please note that failure to provide consent, or withdrawal of the consent, could affect our ability to assess your entitlement to certain benefits, e.g. without access to your medical information, the Trustee could not process a claim for ill-health early retirement. If you do withdraw consent, then that will not affect the lawful basis on which the data was processed prior to consent being withdrawn.

### 4. SHARING YOUR INFORMATION

We may share your information with:

- any of your employers or former employers who participate in the Fund;
- our professional advisers (including legal advisers, consultants, medical advisers and auditors);
- the third party administrator appointed by the Trustee to provide day to day administration services;
- the Fund actuary;
- other organisations providing services to the Trustee, including pensions governance and communications providers, pensions tracing services, and brokers, insurers, reinsurers and other risk-transfer and liability management providers engaged by the Trustee,

either on an ongoing or one-off basis, but in each case only in relation to matters connected to the administration of the Fund and your benefits under it. We will never use or transfer your data for purposes unconnected with the administration of the Fund.

Some third parties to whom we may disclose personal data, for instance professional advisers, are data controllers in their own right, and you should refer to their own privacy notices, which can be found on the websites listed at the end of this notice, and policies in respect of how they use your personal data.

We may also share your information with government agencies and other authorities (including HMRC and the Pensions Regulator) where necessary for the proper administration of your benefits, the prevention of crime or to meet legal and regulatory requirements.

Your personal data may also be disclosed to advisors, potential transaction partners or interested third parties in connection with the consideration, negotiation or completion of a corporate transaction or restructuring of the Fund's sponsoring employer.

Parties that process data that is shared with them will be "data processors".

#### 5. PROCESSING YOUR INFORMATION OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA")

All countries within the EEA have similar standards for the protection of personal data as the UK. Where any of your information is transferred outside the EEA (e.g. because any of our advisers or service providers have IT systems located in other jurisdictions, or because this is necessary to operate the overseas pensioner payroll) we ensure that there are appropriate safeguards in place to ensure the security of personal data. Please see the "Contact us" section below if you would like further information about these safeguards.

#### 6. SECURITY OF YOUR INFORMATION

The Trustee is committed to ensuring that your personal information is secure. We have in place appropriate technical and contractual measures to ensure that information is only shared for the reasons, and by the means, set out in this notice. The Trustee takes great care to ensure that your information is kept secure when we need to share this with a third party as outlined above.

#### 7. HOW LONG DO WE KEEP YOUR INFORMATION?

Pension schemes are long-term. We will of course keep your personal information for as long as you are a member of the Fund. We will also retain some information for a period after you leave the Fund, e.g. following a transfer out, to enable us to deal with any queries that may arise after you have left. We will keep information after you have left the Fund for as long as we believe necessary in order efficiently to administer the Fund.

#### 8. MONITORING AND RECORDING

We may monitor, record, store and use any telephone, email or other communication with you in order to maintain a record of any instructions given to us, for training purposes, for crime prevention and to improve the quality of service to Fund members.

#### 9. ACCESS TO YOUR INFORMATION

By law you are entitled to know what personal information we hold about you, the purpose for which we hold it and the identity of any person to whom it has been disclosed. You can also ask us to correct any errors in your data, and can ask for unnecessary or outdated data to be deleted. You can also object to the processing. Please see the "Contact us" section if you would like more information.

You are also entitled to receive a copy of the information and you can exercise these rights by contacting the Trustees.

#### 10. CONTACT US

The Trustee is a "data controller" in relation to the Fund, i.e. we determine the purposes for which your personal data are processed, and how they are processed. If you would like any further information about the Trustee's approach to data protection and privacy, or to request details about the information we hold, please contact us as follows:

Du Pont (U.K.) Trustees Limited  
C/O Willis Towers Watson, 4 Falcon Way, Shire Park,  
Welwyn Garden City, Herts, AL7 1TW

#### 11. THE INFORMATION COMMISSIONER

The Information Commissioner is the UK's independent authority set up to uphold information rights and data privacy for individuals. You have the right to lodge a complaint with the Information Commissioner if you are dissatisfied with any aspect of the way that we collect and use your personal information. The Information Commissioner's website can be found at [www.ico.org.uk](http://www.ico.org.uk) or you can call their helpline on 0303 123 1113.

#### 12. UPDATES AND CHANGES

We will keep this privacy policy under review and may update it from time to time without prior notice. Any revised policy will be issued in due course along with member announcements.

#### 13. OTHER THIRD PARTY DATA CONTROLLERS

We set out below a list of the other third parties to whom your data may be disclosed and who are data controllers, together with details of their own privacy notices.

<b>Data Controller</b>	<b>Privacy Notice can be found at:</b>
Willis Towers Watson	<a href="http://www.willistowerswatson.com/personal-data">www.willistowerswatson.com/personal-data</a> .
DLA Piper UK LLP	<a href="http://www.dlapiper.com/en/uk/privacy-policy/">www.dlapiper.com/en/uk/privacy-policy/</a>
Phoenix Life Limited	<a href="http://www.thephoenixgroup.com/site-services/privacy">www.thephoenixgroup.com/site-services/privacy</a>