

Rolls-Royce UK Pension Fund

Data Protection (Privacy Notice)

What information does the Trustee collect about you?

The Trustee collects personal information about you, such as:

- your name, address, date of birth, gender, telephone number, e-mail address, national insurance number, bank account details (in some cases), and country of residence.
- information relating to your benefits such as your member identifying number (which is assigned to you by the fund), the login information for your online account, the date you joined or left the fund, your earnings, 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, tax protections or other adjustments; and
- in some cases, special categories of personal data such as 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 dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

This information may be obtained from you when you join the pension fund and when you notify any changes to the information. In some cases, the Trustee will collect personal information about you indirectly from your (current or former) employer and from other service providers (e.g. the fund administrator, which is the Rolls-Royce PLC Pensions Team at present).

How does the Trustee use the information about you?

The Trustee collects and uses information about you 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) the general running of the pension fund such as: to calculate, record and pay your benefits; for reviews the Trustee or its administrators conduct for statistical and reference purposes; and for other administrative activities that may become necessary from time to time (like member tracing) should the Trustee happen to lose contact with you and to prevent fraud;
- c) for meeting the Trustee's on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- d) to improve the Trustee's processes and its use of technology, including testing and upgrading of systems, and to learn about other processes the Trustee can use to improve the administration of the fund; and
- e) when the Trustee undertake activities from time to time to help it manage the liabilities of the fund, such as longevity hedging, insuring fund liabilities with an insurer, fund mergers, bulk transfers, and pension increase exchanges, 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.

The Trustee's use of your information as described above is permitted by applicable data protection law because it is:

- i. necessary for the Trustee's legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when the Trustee makes disclosures to your (current or former) fund employer for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of that entity, such interests in each case not being overridden by your privacy interests;
- ii. in some cases, necessary to meet the Trustee's 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 the Trustee uses 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 the Trustee obtains from you from time to time, such as when you ask it to make disclosures or allocate benefits or where the fund rules require you to provide information which the Trustee cannot otherwise process without your consent.

Retention of your information

The information may be retained by the Trustee for the longer of the period required in order to meet our legal or regulatory responsibilities, and the relevant period of time envisaged in the Rolls-Royce record retention policy. The Trustee determines the period envisaged within such documentation with regard to the fund's operational and legal requirements. In general, the Trustee will keep your information for 12 years after the date of death of the relevant member, or the member's dependants/beneficiaries.

Disclosures of your information

Your personal information may be shared with organisations acting on the Trustee's behalf. These include:

- the Trustee's suppliers and professional advisers, such as the fund administrator (being currently the Rolls-Royce PLC pensions team) and the provider of actuarial services to the fund (being currently Mercer), financial advisers (to provide you with financial advice), payroll providers (to record and pay benefits), providers of printing, communication, IT and hosting, marketing, and tracing services (and when the Trustee shares information with these recipients it takes steps to ensure they meet its data security standards, so that your personal data remains secure);
- providers of insurance and reinsurance in relation to the fund's liabilities such as when the Trustee carries out the activities referred to in (e) above;
- your (current or former) employer such as for audit purposes, in relation to corporate transactions initiated by that entity and, in certain circumstances, other employers or other pension schemes;
- 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 the Trustee to do so; 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 such as the Pensions Ombudsman or the Pensions Regulator.

Transfers of your information abroad

- The use and disclosure of your information for the purposes referred to in any of (a)-(e) above may involve transferring your information to countries outside the EEA.

- In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, the Trustee shall ensure that all such disclosures of personal data will comply with the requirements of applicable data protection laws. To ensure an appropriate level of protection, the Trustee typically uses 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 and copies of these agreements are available from the Trustee on request.

Where the personal data the Trustee collects from you is needed to meet its legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, it is a condition of membership of the fund that you agree to the use of your personal information in this way, as the fund cannot operate without it since the Trustee may be unable to administer your contributions and benefits or record or calculate or pay your or your beneficiaries' benefits

Actuary

The Trustee, Mercer Limited and the individual appointed as scheme actuary each act independently from one another as “data controllers” and are each committed to protecting your information and acting in accordance with your rights under data protection law. The Trustee, Mercer Limited and the scheme actuary are not “joint controllers”, and process personal data differently and separately. Mercer Limited and the scheme actuary process personal information to fulfil the duty of care that scheme actuaries (or providers of actuarial services) are required to undertake under their appointment. Mercer Limited also provides advice to the Company in relation to the fund.

For information on how Mercer Limited and the scheme actuary use and disclose your personal information, the legal bases for their use of information, and how to exercise your data protection rights in respect of their use of information, please see their privacy notice at **www.mercer.com/privacy** or by contacting Mercer Limited at the address below.

You can also find out the name of your scheme actuary by checking the latest version of your pension scheme documents.

Data Protection Officer, Mercer, Tower Place, London, EC3R 5BU

Your Rights

Data protection law gives you (or your dependants) rights to request a copy of the personal data the Trustee holds about you, to rectification or erasure of your personal data and to restrict its processing, to tell the Trustee 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 the Trustee's processing of your personal data. If you would like to exercise any of the above rights, or have any questions, please refer to the Trustee's Data Subject Access Request policy (available on request, by emailing **pensions.web@rolls-royce.com** or write to the Trustee at the address shown below. You can also use this address if you wish to make a complaint about how the Trustee processes your information.

You can also lodge a complaint about the Trustee's processing of your personal information with the Information Commissioner's Office (**www.ico.org.uk**) or, if you are no longer resident in the UK, the relevant data protection authority in your country of residence.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Helpline number: 0303 123 1113

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. The Trustee will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was last updated on **30 September 2022**. It may be subject to amendments. Any future changes or additions to the processing of personal data as described above in this private notice affecting you will be communicated to you through an appropriate channel, depending on how the Trustee normally communicates with you.

Pensions Department (ML-90), Rolls-Royce plc, PO Box 31, Derby, England, DE24 8BJ.