

CHUBB SECURITY PENSION FUND

CHUBB SECURITY PENSION FUND (THE “FUND”)

THE GENERAL DATA PROTECTION REGULATION (“GDPR”)

PRIVACY NOTICE

This Privacy Notice, which is a requirement of legislation (namely the GDPR and the Data Protection Act 2018), explains how Chubb Security (Pensions) Limited (the Trustee of the Fund (**Trustee**)) as data controller use the data they collect about you.

The Trustee has, on advice, decided that they are not required to appoint a Data Protection Officer.

PURPOSE OF THE PROCESSING OF PERSONAL DATA AND THE LEGAL BASIS FOR THE PROCESSING

The Trustee’s fundamental responsibility is to administer the Fund for the benefit of the members and other beneficiaries. Types of personal data that we collect and use for this purpose include: name, date of birth, gender, marital status, contact details, employment history including salary information, National Insurance details, HMRC Tax Codes, bank/savings account details, and health information.

The data that the Trustee collects in relation to you will be used to allow you to:

- i) remain a member of the Fund (whether that is a deferred member who has left employment with the employer that sponsors the Fund or as a pensioner);

and to allow the Trustee to:

- i) communicate with you about your benefits and the Fund;
- ii) respond to requests for information or queries on your benefits;
- iii) assess your entitlements and to pay to you and/or your beneficiaries, benefits (pension and lump sum) from the Fund.

The Trustee does not use your personal data for any statistical analysis in order to facilitate the sale of any services or goods to you.

The Trustee is required to advise you if automated decisions, being decisions that do not involve consideration by other individuals, occur in relation to your data. The Trustee can confirm that no automated decisions are undertaken that have significant consequences for you as the data subject in respect of the data that we hold as data controller, nor by any of the data processors with whom we share data.

The lawful basis on which the Trustee processes your data is that the processing is necessary for the purposes of legitimate interests pursued by the Trustee.

For these purposes legitimate interest means the Trustee’s interests as trustee of the Fund in running the Fund as effectively, efficiently and securely as possible. The

Trustee includes within this its obligations to run the Fund in keeping with legal requirements, which include but are not limited to trust law, pensions legislation, tax law and regulatory guidance.

The Trustee also has duties and powers; some of which are conferred by law and some by the governing documentation of the Fund. Utilisation of data in order to ensure the Trustee complies with these duties and powers is also a part of their legitimate interests.

All the processing of personal data that the Trustee undertakes is designed to ensure that all members receive their appropriate entitlement to a pension and other benefits. The Trustee does not consider that these legitimate interests and the legal obligation compliance requirements would cause harm or hurt to any individual in respect of whom the Trustee holds data.

Any sensitive data (information on ethnicity, religious belief, trade union membership, sexual orientation or health etc.) processed by the Trustee is done so under the 'Employment, social security and social protection' provision of the Data Protection Act 2018. This provision allows the processing of sensitive data where the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or social protection (which includes the provision of survivors' benefits). Where the Trustee relies on such provisions, the Trustee will ensure that appropriate and adequate policies and safeguards are in place.

DOES THE TRUSTEE SHARE YOUR DATA?

At present, the Trustee may share your personal data with:

- Your current or former employer and their advisers in relation to the Fund;
- The administrators of the Fund to whom the Trustee has delegated some of the day to day and ongoing activities essential to the running of the Fund;
- Members' appointed independent financial advisers;
- The Fund's additional voluntary contribution (AVC) providers, such as Aegon, etc. in order for them to administer the Fund's AVC benefits;
- A professional actuary appointed as the Scheme Actuary to the Fund so that (s)he can carry out the necessary calculations in order to assess the benefits and to assist the Trustee with agreeing payments to the Fund to fund the benefits. The Scheme Actuary may also use your personal data in research which assists actuaries in providing this type of advice (which is anonymised as far as possible before being provided to a recognised external authority). The Scheme Actuary is currently Paul Houghton of Barnett Waddingham and he has confirmed he considers himself to be a "joint data controller" with the Trustee for the purpose of GDPR.
- Insurers who provide the Trustee with insurance to cover payment of benefits or from which the Trustee purchases policies to provide pension benefits when a member comes to retire (an annuity), life assurance benefits where applicable their counterparties (such as reinsurers), and brokers who are typically involved in arranging such insurance;

- Investment managers: professionals with the relevant experience to advise the Trustee on the investment of the Fund assets;
- Fund auditors: all schemes are required to have professional auditors appointed, who review and input into the Fund's annual accounts;
- Legal advisers who advise the Trustee on compliance with legislation and other legal issues to ensure the legal and effective running of the Fund. The Trustee's legal adviser has advised that its role in relation to the Fund is that of data controller. Their Privacy Notice can be accessed via their website: <https://cms.law/en/pol/footer-configuration/privacy-policy>;
- External printers and mailing houses, solely in relation to the mailing of Fund communications to members; and
- HM Revenue & Customs, the Pensions Regulator (in connection with reporting duties it has at any given time) and other statutory/regulatory bodies.

On specific occasions the Trustee may also share your data with:

- Appointed covenant advisors who are specialists with knowledge and expertise in assessing the financial strength of the company/organisation supporting the Fund;
- Benefit consultants who provide advice to the Trustee about the design of the Fund;
- Other third parties who provide one-off services such as tracing services where we are unable to locate an individual who we believe has an entitlement under the Fund, organisations that provide secure data storage or destruction and IT specialists who advise on disaster recovery and cyber security.

We can confirm that all third parties with whom we share your data have committed to compliance with the GDPR. However, please see the section relating to transfers of data later on in this notice.

DATA RETENTION

As long as you remain a member of the Fund with an entitlement to a benefit either for yourself or your beneficiaries or your estate, the Trustee will retain the information necessary to allow them to fulfil their legitimate interests and manage and eventually pay that benefit entitlement.

The Trustee has a data retention policy which sets out the full details in relation to all the data that is held.

YOUR RIGHTS

As an individual on whom the Trustee holds personal data you have rights in relation to that data and this Privacy Notice informs and confirms to you those rights. As a data subject, you have the right:

- to have access to your personal data by writing to the Trustee at the address at the end of this notice and you have the right to have your data transferred to you or another Data Controller in a structured, commonly used and machine readable form;

- to have your personal data amended if it is inaccurate or is not complete;
- to have your data deleted if there is no legitimate reason for its continued storage or processing;
- to object to your data being processed and to restrict the processing of your data in certain circumstances; and
- to make a complaint about the processing of your data and the Trustee as data controller to the Information Commissioner's Office. Contact details for the Information Commissioner's Office are at the end of this Notice.

If you have given your consent to the use of your personal data (including sensitive data), you can withdraw that consent at any time.

Please be aware that on exercising your rights, particularly your right to withdraw consent, have data deleted and your right to object to or restrict processing of your data, the Trustee may not be able to fulfil their obligations to you in relation to the Fund in pursuance of their legitimate interests and that your entitlement to benefits may be affected. It may also be the case that the Trustee is able to confirm circumstances whereby your right is not going to be enforced, where it is legally acceptable to do so and the Trustee will, in that instance, confirm the reasons for that decision.

TRANSFERS OF PERSONAL DATA TO OTHER COUNTRIES

As indicated above, the Trustee provides information to certain third parties who either advise the Trustee or who provide services in relation to the Fund. Certain of those parties have stated to the Trustee that, in providing the services they have been contracted to provide, they do or they may transfer data outside the European Economic Area (EEA). Where data is transferred outside the EEA and as stated previously, you can expect a similar degree of protection in respect of your personal information. The Trustee has taken steps / caused relevant providers which consider themselves to be data controllers to ensure that, where data is transferred to one or more third countries outside the EEA, the countries to which data is transferred are deemed to provide an adequate level of protection for your personal information.

GDPR AND THE UNITED KINGDOM'S EXIT FROM THE EU

The Trustee notes that the GDPR came into force before the date on which the United Kingdom (UK) left the EU. Now that this country has left the EU, it will be considered a "third country" for the purposes of data transfers and, as such, it will be required to have "adequate" data protection in place. The UK Government confirmed, in 2017, that the UK would transpose the GDPR into its national laws. To this end, the Data Protection Act 2018 came into force on 25 May 2018.

CONTACTS

If you have any questions regarding your benefits in the Fund, please contact the administrators as follows:

Buck, PO Box 322, Mitcheldean, Gloucestershire, GL14 9BH.

Member helpline: 0330 123 9563

Email: chubbpensions@buck.com

The main contact for the Trustee, if you have any questions in relation to this GDPR notice, is the Secretary to the Trustee of the Chubb Security Pension Fund, c/o Barnett-Waddingham LLP, 2 London Wall, London EC2Y 5AU. Or email: Chubb.PM@Barnett-Waddingham.co.uk

The Information Commissioner's Office can be contacted on the following details:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
Cheshire, SK9 5AF

<https://ico.org.uk/>

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

February 2023