

DELOITTE UK PENSION SCHEME

Personal information and what we do with it

As the Trustee of the Scheme, we need personal information about you to run the Scheme and pay benefits. Similarly, other parties involved in running the Scheme will sometimes need to make decisions independently from the Trustee about how your personal information will be used. In particular, this will involve the Scheme actuary (currently Jane Curtis of Aon Hewitt).

In legal terms, the Trustee and the Scheme actuary are both a 'data controller' of this information and are separate and distinct from each other.

In this notice you will see information about what the Trustee does with your personal information including the personal information the Trustee might have about you and what your rights are in relation to it, together with information on how to find out more about how the Scheme actuary uses your personal information.

What personal information we have

We hold the following types of personal information about you:

- Your name, date of birth, national insurance number and bank account information;
- Contact details (including your address, phone number and, only if you have provided it to us or are an employee who has a Deloitte email account, your email address);
- Your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time;
- Whether you are married or in a civil partnership and other information we might need to pay any death benefits due in relation to you (only if you have provided it to us);
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes hold other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions where it is relevant to your entitlements under the Scheme.

Where we get personal information

Some of the information we have comes directly from you. We may also have received information (such as salary details) directly from your current or former employer. In addition, the Deloitte pension team, which administers the Scheme on our behalf, may have obtained information from you and passed it to us.

Sometimes we get information from other sources, for example, another scheme if you have transferred benefits from them, government departments such as HMRC and DWP and publicly accessible sources (eg the electoral roll) if we lose touch with you and try to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Our legal basis for using your personal information including how we share it

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to running the Scheme.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights and to prevent and detect crimes such as fraud. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

We also have a legitimate interest in properly administering the Scheme. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; ensuring benefits are correctly calculated; calculating the actuarial liabilities of the Scheme; making Trustee decisions such as how to distribute benefits after your death; and ensuring that the expected standards of Scheme governance are met (including the standards set out in the Pensions Regulator guidance).

In order to achieve this, we may share your personal information with various people, including any new Directors of the trustee; employers; the Scheme administrator; the Scheme actuary; our professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; IT and data storage

providers; and other service providers. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent and we will do so where that is necessary for us to run the Scheme in a sensible way. You can withdraw your consent at any time by using our contact details (below). This may affect what we can do for you unless we have another lawful reason for using your information.

We may also share your personal information with someone else where you have given your consent, for example, where you transfer the value of your benefits out of the Scheme.

Sometimes, your information may be used for statistical research or reporting about the Scheme in general but only in a form that no longer identifies you.

Scheme actuary

The Scheme actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. The Scheme actuary and the company she works for (Aon Hewitt Ltd) process your Personal Information separately from the Trustee.

You can find out more about what the Scheme actuary and Aon Hewitt Limited do with your personal information, and their reasons for processing your Personal Information, by reading Aon Hewitt's full Privacy Notice, which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting Aon Hewitt, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.

How to contact the other people to whom we give your personal information

Some of the people we mention above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers in their own right. In this case, they are subject to the same legal obligations as us in relation to this information and the rights you have in relation to your information apply to them too.

If you want any more information from any of these recipients or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

How long we keep your personal information

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of 75 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you.

However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), and our legal obligations (mentioned above).

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you

You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;

- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances and we will explain these to you where they are relevant.

Our contact details for exercising these rights are set out below and we can supply more information about these rights to you on request.

Keeping your information safe

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Changes to this policy

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are notified to members.

Queries and further information

If you want more information about what we do with your information and what your rights are, the Trustee can be contacted at: D&T Pension Trustees Limited c/o Deloitte Total Rewards and Benefits, Lincoln Building 27-45 Great Victoria Street, Belfast, BT2 7SL; 01908 848909 option 1; ukdukpsadmin@deloitte.co.uk

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns or call its helpline on 0303 123 1113.

We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.

Deloitte ARA Privacy Statement

Last revised: 8 May 2018

Introduction

This Privacy Statement explains what personal information we may gather about you when we provide our clients with services and how this personal information may be used and shared. This Privacy Statement also sets out your rights in relation to your personal information and tells you who you can contact if you have questions.

This Privacy Statement is divided into the sections listed below. If you receive it in electronic form then you can click on the links below to navigate to the relevant topic:

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Who does this Privacy Statement apply to and what does it cover?

This Privacy Statement applies to Deloitte's Actuarial, Rewards and Analytics practice (ARA), carried on by Deloitte MCS Limited and Deloitte Total Reward and Benefits Limited (DTRB) entities within the Deloitte Network (also referred to as "Deloitte", "we", "us", and "our"). As used in this Privacy Statement, the "Deloitte Network" refers to one or more of Deloitte Touche Tohmatsu Limited a UK private company limited by guarantee, and its network of member firms and associated entities, each of which is a legally separate and independent entity. Please see deloitte.com/about for a detailed description of the legal structure of Deloitte Touche Tohmatsu Limited and its member firms.

This Privacy Statement applies where Deloitte's ARA practitioners are providing services including actuarial and other services in Deloitte MCS Limited and pensions, investment, employee benefits and reward advisory services in DTRB. When Deloitte carries out these services, we are acting as a Data Controller and this Privacy Statement sets out how we will process your personal information when providing services to our client.

Deloitte LLP is a limited liability partnership registered in England and Wales with registered number OC303675 and its registered office at 2 New Street Square, London, EC4A 3BZ, United Kingdom.

Deloitte LLP is the United Kingdom affiliate of Deloitte NWE LLP, a member firm of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee ("DTTL"). DTTL and each of its member firms are legally separate and independent entities. DTTL and Deloitte NWE LLP do not provide services to clients. Please see www.deloitte.com/about to learn more about our global network of member firms.



Your personal information will be protected and handled with utmost consideration for its confidentiality and your privacy, and Deloitte will only disclose it to those who need to know in order to appropriately provide the services to our client.

This Privacy Statement contains additional details about when we may share your personal information with other members of the Deloitte Network and other third parties (for example, our service providers).

In this Privacy Statement, we refer to handling, collecting, protecting, analysing, calculating, storing and other professional services in connection with your personal information as "processing".

What personal information do we collect?

Deloitte may collect personal information relating to you such as:

- name
- contact details
- date of birth
- Government identifiers (such as National Insurance number)
- financial information.

Deloitte may also need to process personal information about you that may be considered sensitive or a special category (for example about your health or ethnic origin) that we require to be able to provide the services to our client or that may become apparent to us based on the personal information that we receive.

How do we collect personal information?

Deloitte may collect personal information about you in different ways, for example:

- you may provide it directly to us
- we may obtain it because of the services that Deloitte provides or has previously provided to our client
- we may receive it from other members of the Deloitte Network or from third parties, such as your employer, relevant health professionals and/or other relevant authority/administrative bodies
- we may have observed or inferred from the information you provide to us and the way you interact with us.

This personal information can be received in any manner, including in-person discussions, telephone conversations, and electronic or other written communications.

Without access to all the personal information that we need we may be unable to provide or complete the services to our client.

Where another person (our client, a company, trustee or partnership or any third parties acting on your or their behalf) provides your personal information to us, they must also comply with their obligations under the relevant privacy laws and regulations. Should you feel that the entity for whom you work or a third party has not provided you with proper details about the personal information that they hold about you or has not obtained any necessary consent for us to process that personal information as described in this Privacy Statement then please contact them directly.

Disclosing personal information to us relating to third parties

If any personal information which you provide to us relates to any third party, for example a spouse or civil partner, individuals (including children) who depend on you financially, or a joint account holder or beneficiary or where you are a trustee of a trust, then by providing us with their personal information you confirm that you have obtained any necessary permissions from those persons to the reasonable use of their personal information in the way set out in this Privacy Statement, or you are otherwise permitted to give us this personal information. You should share a copy of this Privacy Statement with those other individuals when disclosing any personal information about them to us.

How do we use your personal information?

Deloitte collects personal information about you to:

- provide services to our client
- produce aggregate insights that do not identify you.

We may also use your personal information for the purposes of, or in connection with:

- compliance with applicable legal, regulatory or professional requirements
- requests and communications from competent authorities
- protecting our rights and/or property.

On what legal basis do we process personal information about you?

As set out above, in ARA we process personal information when providing services including actuarial and other services (in Deloitte MCS Limited) pensions, investment, employee benefits and reward advisory services (in DTRB).

We are required by law to set out in this Privacy Statement the legal grounds upon which we rely in order to process your personal information.

We may use your personal information for the purposes outlined above because:

(a) we have a legitimate interest in processing your personal information, which may be to:

- provide services to our client
- ensure that our client engagements are well-managed
- evaluate, develop or improve our services or products or
- protect our business interests,

or (b) we are subject to legal or regulatory obligations, such as providing information to a public body or law enforcement agency.

We will not process sensitive or special category data without your explicit consent unless permitted by law.

To whom will we disclose your personal information?

In connection with one or more of the purposes outlined in the "How do we use your personal information?" section above, we may disclose your personal information to:

- other members of the Deloitte Network
- those with whom you have requested us to share information, such as your spouse or civil partner
- our client (in the context of performing our obligations under the relevant client engagement)
- competent authorities, including courts and authorities regulating us or another member of the Deloitte Network, in each case to comply with legal or regulatory obligations or requests
- service providers handling your information on our behalf; in each case, such service providers will be contractually bound by confidentiality and privacy obligations consistent with the obligations in this Privacy Statement
- third parties to whom we disclose information in the course of providing services to our client.

Subject to the terms of our client engagement letters, please note that some of the recipients of your personal information referred to above may be based in countries or regions without data protection rules similar to those in effect in your area of residence. In such cases, adequate safeguards will be in place to protect your personal information. Such adequate safeguards might include a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission for transfers of personal information to those countries.

For further details about the transfers described above and the adequate safeguards used by Deloitte with respect to such transfers, please contact us using the details below.

How do we keep your information secure?

We have in place reasonable commercial standards of technology and operational security to protect your personal information from loss, misuse and unauthorised access, disclosure, alteration or destruction. Only authorised personnel, with appropriate awareness of relevant privacy and security obligations, are provided access to personal information.

How long will we keep your information?

We retain personal information as long as is necessary to fulfil the purposes identified in the “How do we use your personal information?” section above or as otherwise necessary to comply with applicable laws, professional standards, or as long as the period in which litigation or investigations might arise in respect of our services to you or our client.

What are your rights?

You have various rights in relation to your personal information. In particular, you have a right to:

- obtain confirmation that we are processing your personal information and request a copy of the personal information we hold about you
- ask that we update the personal information we hold about you, or correct such information that you think is inaccurate or incomplete
- ask that we delete personal information that we hold about you, or restrict the way in which we use your personal information
- withdraw consent to our processing of your personal information (to the extent our processing is reliant on your consent) and
- object to our processing of your personal information.

Any request for access to or a copy of your personal information must be in writing and we will endeavour to respond within a reasonable period and in any event within the period required by applicable data protection legislation. We will comply with our legal obligations as regards your rights as a data subject.

Where our processing of special category personal information is reliant on your consent and you withdraw that consent, we will cease processing the relevant information for the purposes of providing our services and the effect may be that we are no longer able to provide the services. However, we may still retain a copy of the relevant information for as long as necessary to comply with applicable laws or professional standards, or as long as the period in which litigation or investigations might arise in respect of our services.

Changes to this Privacy Statement

We may modify or amend this Privacy Statement from time to time at our discretion. When we make changes to this Statement, we will amend the revision date at the top of this page and the modified or amended privacy statement shall apply to you and your personal information as of that revision date. We encourage you to review the Privacy Statement on our website periodically to be informed about how we are protecting your personal information.



Contact us

If you wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about privacy issues, or you wish to raise a complaint about how we are using your information you can contact us in the following ways:

- Write to Head of Deloitte Business Security, Deloitte LLP at 2 New Street Square, London EC4A 3BZ
- Send an email to ukqrsdataprivacy@deloitte.co.uk

If you have any concerns about our use of your information, you also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113. If you are not based in the UK, you have a right to complain to the EU Data Protection Authority ("DPA") in your jurisdiction. If you would like to be directed to the appropriate DPA, please contact us.