

## Piramal Healthcare UK Pension Fund

### Data Privacy Statement

#### *Trustee's commitment to your privacy*

Piramal Healthcare Pension Trustees Limited (the "**Trustee**" or "**we**" or "**us**") as trustee of the Piramal Healthcare UK Pension Fund (the "**Fund**") is committed to protecting the privacy and security of your personal data. This Privacy Statement ("**Statement**") gives you information about how the Trustee will collect and use your personal data in relation to your membership of the Fund. Personal data is information, or a combination of pieces of information, that could reasonably allow you, or another living individual, to be identified.

The Trustee is the data controller in respect of the personal data they collect about you for the purposes of the Data Protection Act 2018 ("**DPA**") and the UK General Data Protection Regulation ("**GDPR**").

#### *Information the Trustee may collect from you, the Employer or third parties*

The Trustee may collect and process the following types of personal data collected from you or, if you were automatically enrolled into, or a member of, the Fund, the Employer:

- your name, incl. maiden name if applicable
- your contact details
- your date of birth
- your gender
- your marital status
- your National Insurance number
- your bank account details and tax status information
- information relating to your employment with Piramal Healthcare UK Limited (the "**Employer**"), including the length of your employment and your salary, to the extent relevant to your benefits under the Fund
- any other information you provide directly to us in connection with the Fund

In addition, we will collect directly from you:

- details of your nominated beneficiaries, dependants and other persons in your household
- your pension contribution and investment choices
- revisions to any of the above types of personal data

In certain circumstances we may also collect, hold and use personal data of a sensitive nature. This special category of personal data is known as "**Sensitive Personal Data**". Examples of Sensitive Personal Data which we may process are set out in the table on page 3.

Periodically, we may also collect personal data relating to you from third parties such as former employers or regulatory authorities such as HM Revenue & Customs. Personal data collected from third parties include your tax status information.

#### *The purpose and legal basis for processing your information*

Except as disclosed below the table, the purposes for which we may process all of the above non-sensitive personal data, and the legal basis on which we may perform such processing, are:

Processing purpose	Types of personal data	Legal basis for processing
Administering the Fund in accordance with its Rules and applicable law	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in administering the Fund in accordance with its Rules and applicable law
Determining your eligibility to receive benefits under the Fund	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in determining whether you are eligible for benefits under the Fund
Determining the benefits payable to and in respect of you and making correct payments on time to the correct recipient	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> </ul>	We have a <b>legitimate interest</b> in paying the correct benefits on time to the correct recipient in accordance with the Rules of the Fund

	<ul style="list-style-type: none"> <li>length of employment</li> <li>details of dependants</li> <li>contact details</li> <li>other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>National Insurance number</li> <li>payroll records and tax status information</li> <li>information relating to your employment, salary, contributions and benefits</li> <li>other relevant information provided to us</li> </ul>	
Investing your contributions in line with your wishes, or in compliance with the default arrangement	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>name, incl. maiden name if applicable</li> <li>date of birth</li> <li>gender</li> <li>marital status</li> <li>bank account details</li> <li>National Insurance number</li> <li>length of employment</li> <li>details of dependants</li> <li>contact details</li> <li>other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>National Insurance number</li> <li>payroll records and tax status information</li> <li>information relating to your employment, salary, contributions and benefits</li> <li>other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in ensuring that your contributions are invested in accordance with the Rules of the Fund and applicable law
Communicating with you in relation to the Fund and your benefits	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>name, incl. maiden name if applicable</li> <li>date of birth</li> <li>gender</li> <li>marital status</li> <li>bank account details</li> <li>National Insurance number</li> <li>length of employment</li> <li>details of dependants</li> <li>contact details</li> <li>other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>National Insurance number</li> </ul>	We have a <b>legitimate interest</b> in communicating with you in relation to the Fund and your benefits

	<ul style="list-style-type: none"> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	
Communicating and interacting with you via our websites	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in communicating and interacting with you via our websites
Conducting member satisfaction research; and engaging with you for the purpose of obtaining your views on the way we administer the Fund	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in conducting member satisfaction research and engaging with you for the purpose of obtaining your views on the way we administer the Fund
Establishing, exercising and defending our legal rights	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> </ul>	We have a <b>legitimate interest</b> in establishing, exercising and

	<ul style="list-style-type: none"> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	defending our legal rights
For audit, compliance, controls and other risk management	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul> <p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in auditing the Fund and ensuring that it is managed properly
Identifying issues with the way we administer the Fund; planning improvements and making necessary changes	<p><u>Information provided by you:</u></p> <ul style="list-style-type: none"> <li>• name, incl. maiden name if applicable</li> <li>• date of birth</li> <li>• gender</li> <li>• marital status</li> <li>• bank account details</li> <li>• National Insurance number</li> <li>• length of employment</li> <li>• details of dependants</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in identifying issues with the way we administer the Fund so that it is administered properly, and in seeking and implementing improvements that benefit our members

	<p><u>Information provided by Employers and third parties:</u></p> <ul style="list-style-type: none"> <li>• National Insurance number</li> <li>• payroll records and tax status information</li> <li>• information relating to your employment, salary, contributions and benefits</li> <li>• other relevant information provided to us</li> </ul>	
Considering any potential beneficiaries of death benefits under the Fund	<p><u>Personal data of potential beneficiaries:</u></p> <ul style="list-style-type: none"> <li>• name</li> <li>• date of birth</li> <li>• marital status</li> <li>• contact details</li> <li>• other relevant information provided to us</li> </ul>	We have a <b>legitimate interest</b> in selecting beneficiaries of your death benefits under the Fund

We may process Sensitive Personal Data for the following purposes and under the following legal bases:

Processing purpose	Types of Sensitive Personal Data	Legal basis for processing
Considering your eligibility to receive an incapacity pension under the Fund and to assess your continued eligibility from time to time	• health information	We have obtained your <b>prior explicit consent</b> to process your health data.
Considering your eligibility to receive a serious ill-health lump sum	• health information	We have obtained your <b>prior explicit consent</b> to process your health data.
Holding an expression of wish (nomination) form completed by you in respect of any lump sum or other benefits payable on your death	• sexual orientation information	We have obtained your <b>prior explicit consent</b> to process any information which reveals your sexual orientation.

#### ***Disclosure of personal data***

In the course of administering the Fund, the Trustee may share your personal data with the following categories of recipients:

- administrators (Buck Consultants Limited) who are responsible for the day-to-day administration of the Fund, and advising on Fund Communications
- Piramal Healthcare UK Limited
- the corporate entity, Independent Governance Group (IGG) Limited, which provides a professional trustee director to sit on the Trustee board
- MC Squared, the printers who help us to prepare various communications we send to you
- EValue, Lloyds and Western Union, who are organisations involved with making benefit payments

- tracing agencies, including Target Professional Services, and consultants who assist with updating Fund data or providing statistical information
- companies, including Xerox, who manage our hard copy document storage and disposal

This list is not exhaustive and from time to time we may need to share personal data with others in order to administer the Fund and pay benefits.

The Trustee may disclose your personal data to these third parties in connection with services provided by the third parties to the Trustee. These service providers are required to take appropriate security measures to protect your personal data in line with our policies. The Trustee does not allow service providers to use your personal data for their own purposes. The Trustee only permits them to process your personal data for specified purposes and in accordance with the Trustee's instructions.

We may also disclose the personal data to the following categories of recipient who are controllers and will be directly responsible under data protection law for protecting the personal data:

- the Fund Actuary and the actuarial adviser (Aon Solutions UK Limited) for the purpose of providing actuarial services to the Trustee
- the Trustee's legal adviser (Mayer Brown International LLP) for the purpose of providing legal advice to the Trustee
- the Trustee's auditor (Grant Thornton UK LLP) for the purpose of providing audit services to the Trustee
- the Pensions Regulator, the Pensions Ombudsman and HM Revenue & Customs if we are under a duty to disclose or share your personal data to comply with any legal obligation

More detail about Aon, Mayer Brown and Grant Thornton's use of your personal data is set out in their respective Privacy Notices. We recommend that you review these notices, which are available online at:

<http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>;

<https://www.mayerbrown.com/en/legal-notices/privacy-notice>; and

[www.grantthornton.co.uk/en/privacy](http://www.grantthornton.co.uk/en/privacy) respectively.

Alternatively, you can request a copy by contacting Aon Solutions UK, Mayer Brown, and Grant Thornton directly (including a reference to the scheme name) at:

- Data Protection Officer, The Aon Centre, The Leadenhall Building, 122 Leadenhall Street, London, EC3V 4AN
- Data Protection Officer, Grant Thornton UK LLP, 30 Finsbury Square, London, EC2A 1AG
- Data Protection Officer, Mayer Brown International LLP, Mayer Brown International LLP, 201 Bishopsgate, London EC2M 3AF

The list of recipients is not exhaustive and the Trustee may also disclose your personal data to other third parties, for example, in the event that the Trustee wishes to enter a buy-out/buy-in of any of the benefits under the Fund, in which case we may disclose your personal data to the prospective counterparty to such a transaction. The Trustee will update this Statement if the categories of recipient change.

#### *International transfers of personal data*

The personal data that the Trustee processes about you may be transferred to one or more countries outside the UK which has not yet been deemed by the UK Government to offer adequate data protection. This could include circumstances where your personal data is processed by staff operating outside the UK who work for our service providers. In such cases, we will ensure an adequate level of data protection in the country of the recipient as required under the GDPR. This may involve requiring the recipient to enter into a standard form data transfer agreement (approved by the UK Government for this purpose) with us. If you wish to obtain a summary of these safeguards, please contact the Trustee at the below address.

#### ***Automated decision-making***

We do not envisage that any decisions will be taken about you using automated means. In the event that this position changes, we will notify you in writing.

#### ***Retention of personal data***

We will keep your personal data and the personal data of your dependants for as long as may be necessary to fulfil the purposes described in this Statement. Inevitably, this means that we may keep personal data for long periods of time, including after benefits have ceased to be payable to you and your dependants.

To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data and whether we can achieve the purpose of the processing through other means. Our retention of your personal data, and the criteria we apply to determine how long it is necessary for us to retain your personal data, is kept under review.

Currently, the end date for holding your personal data is expected to be 21 years from the date on which benefits cease to be payable to both you and your dependants. If you transfer your benefits out of the Fund, the end date is expected to be 21 years from your normal retirement date.

#### ***Your rights under the UK General Data Protection Regulation***

In certain circumstances, under the GDPR you will have the right to:

- Request access to your personal data. This right always applies. However, there are some exemptions which mean you may not always receive all of your personal data that we process
- Request rectification of your personal data if it is inaccurate or incomplete. This right always applies
- Request deletion of your personal data in certain circumstances if there is no legitimate reason for its continued processing
- Restrict the processing of your personal data in certain circumstances (for example, if you want the Trustee to establish its accuracy or the reason for processing it)
- Object to the processing of your personal data where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing)
- Request the transfer of your personal data which you have given to us to another party. This right only applies where we rely on your consent to process your personal data

- Withdraw your consent to processing at any time, in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. Once the Trustee has received notification that you have withdrawn your consent, it will no longer process your information for the purpose or purposes you originally agreed to, unless it has another legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal

If you want to access, rectify or request deletion of your personal data, object to the processing of your personal data, request that we transfer a copy of your personal data to another party, or withdraw your consent to processing (if applicable), please contact the Trustee in writing at the address given below.

#### *Updates to this Statement*

The Trustee reserves the right to update this Statement and any other relevant policies or procedures at any time. Any substantial changes that we may make to this Statement in the future will be provided to you. The Trustee may also notify you in other ways from time to time about the processing of your personal data.

#### *Contact*

If you have any questions concerning this Statement or the policies or procedures referred to above, please contact the Trustee at:

Trustee Secretary  
Aon  
3 The Embankment  
Sovereign Street  
Leeds  
LS1 4BJ  
Email: [marcus.pollitt@aon.com](mailto:marcus.pollitt@aon.com)

If you are dissatisfied with any aspect of the Trustee handling of your personal data, you have a right to lodge a complaint with the Information Commissioner's Office (ico.org.uk)  
<https://ico.org.uk/concerns/handling/>