

Fujitsu Comparable Pension Scheme Booklet

Section D

Contents

1. Introduction	2
2. Definitions	3
3. Who can join the scheme?	4
4. Can benefits be transferred?	4
5. What are my contributions?	4
6. What does the Company pay?	5
7. What happens to the contributions?	5
8. What are my normal retirement benefits	6
9. Can I take a cash sum at retirement?	6
10. Can I retire early?	6
11. Can I retire after my normal retirement age?	7
12. What benefits are payable on death?	7
13. Do pensions increase during payment?	8
14. What happens if I leave service or opt out of the scheme?	9
15. Who are cash sums paid to after I die?	10
16. How are pensions paid?	10
17. Can I increase my benefits?	10
18. What happens if I am absent from work?	10
19. What else should I know?	11
20. Data Protection	14
21. What further information is provided?	14
22. Divorce or dissolution of a registered civil partnership	14
23. State pension scheme	15

1 Introduction

This guide describes the benefits provided by Section D of the Fujitsu Comparable Pension Scheme ('the Scheme'), describing the Scheme benefits and when they are paid. This should be read together with any other announcements or literature given to you which refer to your membership of the Scheme. This guide outlines the benefits which apply to active members of the Scheme and does not attempt to describe all the circumstances that may arise. If you are entitled to benefits that differ from those shown in this guide you will have been notified separately.

The Scheme is governed by a Trust Deed and Rules which specifies how the Scheme must be operated, and the full terms and conditions of the Scheme are contained within that document. If there is any discrepancy between the Trust Deed and Rules and this booklet, or any other supporting literature, the Trust Deed and Rules will prevail. Only the Trust Deed and Rules may be used for legal interpretation.

The Member Website (MSS) <https://fujitsu.pensiondetails.co.uk>

MSS is a useful tool as you can run your own benefit calculations at any time. You can also update your personal details such as your postal address, email address and your expression of wish form and view the Scheme's document library. MSS is regularly updated with news, information and features.

If you have questions about your pension benefits or need more information, please either visit [MSS](#) or contact the **Pensions Department** at group.pensions@uk.fujitsu.com or telephone **0203 949 3492**. You may also write to the Pensions Department at the following address:

The Pensions Department
Fujitsu
Lovell Road
Bracknell
RG12 8SN

2 Definitions

Certain terms are used in connection with the Scheme and their meanings are given here for ease of reference

Annual Allowance is an annual amount by which your pension savings can grow in a year before being subject to tax. The Government reviews the Annual Allowance from time to time so this amount may change in future tax years. You can check the current Annual Allowance at <https://www.gov.uk/tax-on-your-private-pension/annual-allowance>

Company is Fujitsu Services Limited and any subsidiary or associated Company which has elected to participate in the Scheme.

Death Benefit Salary is the greater of: your basic salary; and your Pensionable Salary without the deduction of the Lower Earnings Limit.

Final Pensionable Salary is the greater of:

- your Pensionable Salary on 6 April on or before your Normal Retirement Date or earlier date of retirement or leaving; and
- the average of your best three consecutive years' Pensionable Salary in the 10 years before your Normal Retirement Date or earlier date of retirement or leaving.

Guaranteed Minimum Pension (GMP) Before 6 April 2016, the State pension included an earnings related element known as S2P. The Scheme was "contracted out" of S2P which meant that the Scheme had to provide a minimum level of benefits. Minimum benefits built up before 6 April 1997 are known as Guaranteed Minimum Pension or GMP.

Incapacity means that your health has deteriorated to such an extent that, in the Trustee's opinion on medical advice, you are unable to carry on your own job, and in the Company and Trustee's opinion on medical advice, you are unable to carry on any job before your Normal Retirement Date.

Lifetime Allowance is the overall limit on the tax advantaged pension savings that you can accumulate over your entire working life. You may have benefits above this amount protected against a tax charge if you have applied for one of the Lifetime Allowance protections available. The Government reviews the Lifetime Allowance from time to time so this amount may change in future tax years. You can check the current Lifetime Allowance at <https://www.gov.uk/tax-on-your-private-pension/lifetime-allowance>

Lower earnings limit is a National Insurance threshold that is fixed by the State at the beginning of each tax year.

Normal Retirement Date is your 65th birthday.

Pensionable salary is your basic annual salary on the date you joined the Scheme and on each following 6 April plus the annual average of any bonus (excluding any Sharing in Success bonus), commission, overtime and shift allowance received in the preceding three years or during such shorter period as applies, less the Lower Earnings Limit at the same date.

Pensionable service is the number of years and complete months of your contributory membership of the Scheme plus any service credits that have been advised to you by the Employer or the Trustee. Pensionable Service ends on your Normal Retirement Date unless you continue in service with the consent of the Company and continue to contribute or there is a Salary Swap arrangement in place. Part time service is counted proportionately on the basis of hours worked.

Principal Employer is Fujitsu Services Limited.

Qualifying service is the length of your most recent continuous period of contributory membership of the Scheme plus the period of membership of any other pension arrangement from which a transfer payment has been received.

S2P was the State Second Pension, replaced on 6 April 2016 by the new State Pension. The Scheme was contracted-out of S2P until 5 April 2016.

Salary Swap has the meaning set out in section 5. References in this guide to benefits which are dependent on you continuing to be in the Salary Swap arrangement should also be read as applying to you if you pay ordinary Scheme contributions from salary.

Spouse means your opposite sex or same sex wife, husband or registered civil partner (although the Trustee may, at its discretion, pay Spouse's benefits to anyone they consider to be wholly or mainly dependent on you).

State Pension Age is the age from which you are entitled to start taking your State retirement benefits. Your state pension age is based on your date of birth.

Trustee is Fujitsu Comparable Pension Trust Limited

3 Who can join the scheme?

You will be eligible to join the Scheme solely on invitation by the Company.

Membership of the Scheme is not a condition of employment and you can opt out whenever you wish. There is no specific period of notice you need to give but you must let **AskHR** know that you wish to leave and they will arrange for your contributions to stop from the month following the date of notification.

If, after opting out, you subsequently change your mind, you will not usually be allowed to rejoin the Scheme. So you should think carefully before you decide to opt out. After opting out you will remain covered for lump sum death in service benefits.

4 Can benefits be transferred?

The Trustee currently has a policy of not accepting transfer payments for benefits from other pension arrangements, except in special circumstances, where it may be requested to do so by the Company. If you are advised that you can transfer previous benefits into the Scheme you will usually receive a Pensionable Service credit in exchange.

5 What are my contributions?

Your contribution to the Scheme is 3.75% of your Pensionable Salary. Contributions to the Scheme will usually be made using a Salary Swap arrangement as explained below.

A Salary Swap arrangement means that you do not pay any Scheme contributions, but instead you contractually give up an amount of your salary which matches the ordinary contributions you would have made. The Company then makes contributions to the Scheme equal to the salary which you gave up, known as 'Salary Swap Contributions'.

The Company will establish a 'notional salary' for you (equivalent to what your Pensionable Pay would have been if you had not given up some of your salary as part of the Salary Swap arrangement) which will be used to calculate your benefits in the Scheme.

You do not have to join the Salary Swap arrangement, but if you do your salary is contractually reduced, and the lower salary means you save money by paying less in National Insurance contributions. This may mean a slight reduction in your entitlement to 'contribution based' State benefits (such as Incapacity Benefits and Jobseekers' Allowance) and possibly to 'earnings related' State benefits (such as Maternity Allowance).

You cannot be in Salary Swap if this would take your salary below the National Minimum Wage and the Company may choose to impose a higher threshold. You will be contacted if your salary is not enough to allow you to participate in Salary Swap, and in this case your contributions would be collected directly from your salary.

If you leave the Scheme without leaving employment, your salary will be restored to the level it would be without Salary Swap.

Whether you participate in Salary Swap or not, you will usually receive tax relief at the highest rate you pay on your contributions, subject to the Annual and Lifetime Allowances.

You can choose to opt out of the Salary Swap arrangement and pay contributions by direct deduction from your salary. If you wish to opt out you need to contact **AskHR** but please remember that you will lose the National Insurance contribution saving you can make through the Salary Swap arrangement, so your take home pay will be less.

Salary Swap Contributions continue until your Normal Retirement Date or earlier date of retirement, leaving service or death. Should you continue in service after your Normal Retirement Date you may choose to continue paying Salary Swap Contributions.

6 What does the Company pay?

The Company meets the cost of the Scheme, after taking account of the members' contributions. At least once every three years the Scheme's assets and liabilities will be valued by the Scheme Actuary and a rate of Company contribution will be calculated and agreed with the Company which is considered sufficient to ensure that the benefits are funded over the long term.

7 What happens to the contributions?

All contributions are paid into a trust fund which is separate from the Company's business. Scheme benefits are paid from this fund which is invested by independent experts appointed by the Trustee. For the lump sum death in service benefit, the Trustee is currently paying premiums from the Scheme to an insurance Company for a policy which it has taken out to provide the benefits.

8 What are my normal retirement benefits?

On retirement at your Normal Retirement Date you will become entitled to a pension, payable for the rest of your life, which is calculated as 1.7% of your Final Pensionable Salary for each complete year and month of your Pensionable Service. Error! Hyperlink reference not valid.

You may also be entitled to a State Pension from the Government, payable from your State Pension Age. State Pension Age may be later than your Normal Retirement Date. You can check your State Pension Age at www.gov.uk

9 Can I take a cash sum at retirement?

When you retire you may, if you wish, convert part of your pension to provide a tax-free cash sum. Usually, the maximum tax free amount that you can take is 25% of the value of your pension benefits. You may also be able to take some of your Additional Voluntary Contributions or Additional Swap Contributions (see section 17) as an additional cash sum subject to applicable tax.

You may be able to take all of your benefits under the Scheme as a cash sum in certain, limited circumstances (but usually only on or after age 55). This option would apply if your benefits under the Scheme had a value of under £10,000 or if your benefits under all registered pension arrangements had a value of under £30,000. (The Government may change these amounts from time to time).

From April 2015 the government introduced greater flexibilities on how pensions can be taken, including taking up to the whole amount of your pension as a cash sum. If you are considering a transfer out of the Scheme to take advantage of the new options we recommend that you get advice or guidance to help you with this decision. Pension Wise is a service set up by the government to provide free and impartial guidance. For more information go to www.pensionwise.gov.uk

Transferring out would be a material step and may have significant risks attached. When you are looking into your options, you should consider taking independent financial advice to help you decide which option is the most suitable for you (and in some circumstances the Trustee of the Scheme will require you to have done so). You can find an adviser on this website: www.unbiased.co.uk

10 Can I retire early?

You can choose to retire early from age 55 (or earlier if retiring for Incapacity). If you transferred benefits from another pension arrangement into the Scheme, you may qualify for protection of an existing right to retire earlier.

Your pension will be based on completed Pensionable Service and Final Pensionable Salary at the date you retire.

If the Principal Employer agrees to your retirement and:

- you retire before age 60, your pension will then be reduced for early payment over the period from your retirement date to your 60th birthday; or
- you retire on or after your 60th birthday, your pension will not be reduced for early payment.

If you do not receive the Principal Employer's consent, your pension will be reduced for early payment over the period from your retirement date to your 65th birthday.

If you are retiring before State Pension Age you can ask the Trustee (who will consider your request but is not required to comply with it) to integrate your Scheme pension with a proportion of your State pension. Your Scheme pension would be increased over the period to State Pension Age but then reduced to reflect the pension you would receive from the State. If you are interested in this option you should ask for a quote before the date of your retirement.

You may convert part of your early retirement pension for a tax-free cash sum.

You will require the Company's consent if you wish to take your benefits early while still continuing to work for the Company.

11 Can I retire after my Normal Retirement Date?

If you remain employed after Normal Retirement Date you can:

- Take your pension at Normal Retirement Date.
- Stop participating in the Scheme but take your pension at a later date.
- Continue to participate Scheme and continue to accrue pension benefits beyond your Normal Retirement Date.

Once you stop participating in the scheme your pension is calculated using your Pensionable Service and Final Pensionable Pay at that date. If you stop participating in the scheme on or after Normal Retirement Date and take your pension at a later date, your pension will be uplifted by a late retirement factor reflecting the period from when you stopped to participate to when you decide to take your pension.

12 What benefits are payable on death?

Death in Service before Normal Retirement Date

If you die before Normal Retirement Date while employed by the Company the following benefits will be payable:

- A lump sum of 4 x your Death Benefit Salary at the date of your death.
- A bereavement grant of £1,000.
- An additional lump sum equal to your contributions to the Scheme.
- A pension for your Spouse of 30% of your Death Benefit Salary at the date of your death.
- Children's pensions of 10% of your Death Benefit Salary will be payable for each child under the age of 18 (or 23 if in full-time education or vocational training), up to a maximum of three children. Children's pensions will be doubled if you do not have a Spouse at the date of your death.

Death in Service after Normal Retirement Date

If you die in service after your Normal Retirement Date while employed by the Company the following benefits will be payable:

- A lump sum calculated as follows:
 - if you had continued your contributions to the Scheme, a lump sum death benefit of 4 x your Death Benefit Salary at the date of your death.
 - if you had stopped your contributions to the Scheme, a lump sum benefit equal in value to the instalments of the pension you would have been paid for the first five years, ignoring any pension increases that might have been granted (assuming that you had retired the day before your death).
- A pension for your Spouse of 50% of your own pension based on your Final Pensionable Salary and completed Pensionable Service at the date of your death, if you had continued to contribute to the Scheme, or at your Normal Retirement Date if you had stopped contributing to the Scheme.
- If on your death you do not leave a Spouse, or if your Spouse dies while receiving a pension, children's allowances of one third of the Spouse's pension will be payable for each child under the age of 18 (or 23 if in full-time education or vocational training), up to a maximum of three children.

Death after Retirement

- If you die within five years of the start of your pension, a lump sum will be paid equal to the value of the instalments of your own pension which would have been paid from the date of your death to the end of the five year period.
- A pension will be paid to your Spouse, of one half of your own pension for the rest of his/her lifetime. For the purpose of calculating this pension, any pension you

gave up to provide a tax-free cash sum when you retired will be added back to your own pension.

- If you do not leave a Spouse the Trustee can pay the Spouse's pension to an adult person who is financially dependent on you at the date of your death.
- If on your death you do not leave a Spouse, or if your Spouse dies while receiving a pension, children's pensions will become payable of one third of the Spouse's pension for each child under the age of 18 (or 23 if in full-time education or vocational training), up to a maximum of three children.

Spouse's pensions

- The Spouse's pension will be paid for the remainder of his or her lifetime unless your Spouse remarries or enters a new civil partnership when it will stop.
- If your Spouse is 10 or more years younger than you, the pension may be reduced to take account of the longer period for which it is likely to be paid.
- Any Spouse's pension paid will be subject to income tax but its value will not count towards your Spouse's own Lifetime Allowance.

13 Do pensions increase during payment?

Pension earned before 6 April 1997 in excess of GMP, is currently increased each year by 3% per annum. Pension earned from 6 April 1997 is currently increased each year in line with the Retail prices Index (RPI), subject to a maximum of 5% per annum. GMP (if applicable to your pension) will be increased as required by legislation.

Special increases may apply to any benefits you have transferred into the Scheme. You will have been notified of these separately.

Each year, pensions being paid will be reviewed by the Trustee and, with the Company's consent, it may grant an additional increase above the amount guaranteed. This depends on inflation, the financial strength of the fund and other relevant considerations.

Pension increases will take effect on 1 April in each year. A proportionate increase will be granted in the case of pensions which came into payment during the preceding year. The increases described in this section also apply to pensions payable to your Spouse or dependent children.

14 What happens if I leave service or opt out of the scheme?

If you have completed at least two years' Qualifying Service, you will be entitled to deferred pension benefits payable from your Normal Retirement Date based on your Final Pensionable Pay at, and Pensionable Service completed to, the date of leaving.

During the period to Normal Retirement Date deferred benefits in excess of any GMP will be increased in line with an index of prices, currently the Consumer Prices Index (CPI), up to a maximum of 5% per annum compound. GMP (if applicable to your pension) will be increased as required by legislation.

Special terms may apply to benefits you have transferred into the Scheme. You will have been notified of these separately.

In the event of your death after you leave the Scheme and before Normal Retirement Date the following benefits become payable:

- A lump sum equal to your contributions to the Scheme will be refunded.
- A Spouse's pension equal to one half of your own deferred pension including increases up to the date of death.

Transfer to another pension arrangement

Instead of a deferred benefit you can request that the value of all, or part of (subject to Company and Trustee consent) your benefits are transferred to another registered pension arrangement.

The transfer payment will be calculated on a basis agreed by the Trustee on the advice of the Scheme's Actuary, in line with statutory requirements.

In some circumstances, it may be necessary to reduce the amount of the transfer payment. We will let you know if this applies to you when we tell you the amount of your transfer payment.

If you are thinking of transferring your benefits into another registered pension arrangement, you can calculate the transfer value of your benefits on MSS or you can contact the Pensions Department.

If you are considering taking a transfer, you may wish to engage an independent financial adviser to help you to understand the implications of making the transfer from the Scheme.

If your transfer value is £30,000 or more, and you intend to transfer to a defined contribution (also known as money purchase) pension scheme, such as a personal pension, you must receive Financial Conduct Authority (FCA) regulated advice from an independent financial adviser. The Trustees are required by law to check that you have done this before a transfer can be processed.

From April 2015 the government introduced greater flexibilities on how pensions can be taken.

If you are considering a transfer out of the Scheme to take advantage of the new options we recommend that you get advice or guidance to help you with this decision. Pension Wise is a service set up by the government to provide free and impartial guidance. For more information go to www.pensionwise.gov.uk

15 Who are cash sums paid to after I die?

Cash sums payable on death are distributed by the Trustee for the benefit of your dependants and beneficiaries. The Trustee has discretion to decide who should receive the monies and, although it will take account of your wishes, it is not bound by them.

To indicate your wishes to the Trustee you should fill in your bereavement beneficiary details on AskHR. You should also complete an expression of wish form by logging on to Member Self Service (MSS) at <https://fujitsu.pensiondetails.co.uk> and entering the information online. You are free to change your expression of wish form at any time and you should consider this if your personal circumstances change.

16 How are pensions paid?

All pensions are currently paid on the 18th of the month for that calendar month. The pension is paid into your bank account.

17 Can I increase my benefits?

If you wish, you may make additional contributions to increase your benefits under the Scheme. This is a tax efficient way of saving for retirement. Any additional contributions you choose to pay can (and will usually) be made through the Salary Swap arrangement (see section 5) and are known as 'Additional Swap Contributions' (ASCs).

Once a year, during the annual Your Choices Flexible Benefits enrolment, you will be reminded of the opportunity to start paying ASCs or alter your selection. You can make the selection yourself in November with changes effective from the following January. You can also make changes to ASCs in any month by logging a call in ASK HR; these changes will take effect from 1st of following month.

Further one-off contributions may be paid at other times by personal cheque but you will have to reclaim the tax relief due yourself.

Your additional contribution fund is kept separate from your main Scheme benefits and will be invested with a provider under a group policy taken out by the Trustee. This fund may be used to provide a cash lump sum or other additional benefits when you retire.

18 What happens if I am absent from work?

If you are absent from work because of ill health the period of absence will count as Pensionable Service for so long as you continue to be paid by the Company or you are receiving payment from a Company sponsored Permanent Health Insurance Scheme (PHI Scheme). Benefits will be based on your Pensionable Salary before you were absent, increased each year, where absence is prolonged, usually in line with the increase in your income from the PHI Scheme. Your contributions will continue and will be based on any income you receive from the Company or payment you receive from the PHI Scheme.

If you are absent, with the Company's agreement, for another reason, and pay continues, the absence will count as Pensionable Service according to Company policy, but subject to a maximum of 10 years.

In the event of Pensionable Service stopping during absence, you will then be entitled to benefits as if you had left service (see section 14).

If you are absent from work for maternity leave and are contributing to the Scheme through the Salary Swap arrangement before you begin maternity leave, the Company will continue to make its usual employer contributions and additional pension contributions on your behalf to the Scheme whilst you are on leave, to the extent required by legislation (unless this would take your salary below the legal threshold for Salary Swap purposes, in which case you will be opted out of the Salary Swap arrangement and contribute directly to the Scheme as described below).

If you are contributing directly to the Scheme before you begin maternity leave, you will continue to pay contributions based on the actual pay you receive each month (rather than your normal monthly pay). You will be treated as if you are in Pensionable Service whilst you are still receiving maternity pay and making contributions.

Once you have returned to work, if you have a period of unpaid maternity you can (with the agreement of the Trustee and Company) make up any unpaid contributions. The Company will also pay contributions for the same period. If contributions are not made up, the period will be treated as non-pensionable.

Membership of the Scheme will be continuous for periods of Pensionable Service accrued during and after maternity leave provided that you return to work at the end of the period. Should you not return to work your Pensionable Service will terminate at the end of your paid maternity leave.

If you qualify for paternity leave your membership of the Scheme will continue as though you were working normally. You will be notified if you need to contribute to the Scheme during paternity leave.

If you are considering taking adoption or shared parental leave, please contact the Pensions Department for details concerning your Pensionable Service and contributions during your period of absence.

19 What else should I know?

Pension Flexibilities available from 6 April 2015

From April 2015 the government introduced greater flexibilities on how pensions can be taken. If you are considering a transfer out of the Scheme to take advantage of the new options we recommend that you get advice or guidance to help you with this decision. Pension Wise is a service set up by the government to provide free and impartial guidance. For more information go to www.pensionwise.gov.uk

Transferring out would be a material step and may have significant risks attached. When you are looking into your options, you should consider taking independent financial advice to help you decide which option is the most suitable for you (and in some circumstances the Trustee of the Scheme will require you to have done so). You can find an adviser on this website: www.unbiased.co.uk

Who Runs The Scheme?

Responsibility for the operation of the Scheme rests with the Trustee. One-third of the Directors of the Trustee Company are member nominated, the remainder are appointed by the Company. This complies with the provisions of the Pensions Act 2004.

Internal Dispute Resolution Procedure

Should you have a complaint about your benefits under the Scheme, the Trustee has established a formal procedure to deal with your concerns.

Your first point of contact should be:

The Secretary to the Trustee
Fujitsu Comparable Pension Trust Limited
Fujitsu,
Lovelace Road,
Bracknell
Berkshire, RG12 8SN

You will receive a full written response within two months. If the matter is not resolved, you can refer your concerns to the Trustee within six months of the original response.

The Pensions Advisory Service (TPAS)

The Pensions Advisory Service (TPAS) provides people with professional, independent and impartial help with their pensions – for free. They can be contacted at:

11 Belgrave Road,
London
SW1V 1RB

Tel: 0300 123 1047

Website: www.pensionsadvisoryservice.org.uk

Pensions Ombudsman

The Pensions Ombudsman provides an early dispute resolution service which is available to members and beneficiaries who experience any difficulty with the Scheme before (or in addition to) using the Scheme's internal dispute resolution procedure.

The Pensions Ombudsman will also deal with disputes and cases of maladministration which the early dispute resolution service has not been able to resolve. The Ombudsman's rulings have the authority of a County Court and are binding on all parties, except that an appeal can be made on a point of law to the High Court. Members may seek assistance directly from the Ombudsman (whose address is the same as TPAS) although it is envisaged that the initial contact will normally be with TPAS.

Tel: 0800 917 4487

Website: www.pensions-ombudsman.org.uk

Email: helpline@pensions-ombudsman.org.uk

Pension Tracing Service

After leaving service you should maintain contact with the Scheme for so long as you remain entitled to benefits by notifying the Scheme administrator as detailed on your leaving service statement of changes of address. To help members trace pension rights earned with previous employers the Government has set up a pension tracing service. The address of the service is:

The Pension Tracing Service
The Pension Service 9
Mail Handling Site A
Wolverhampton
WV98 1LU

Tel: 0345 600 2537

Website: www.gov.uk/find-lost-pension

The Pensions Regulator

The Pensions Regulator has a range of powers to help safeguard pension rights of members of pension schemes and is able to intervene in the running of schemes where trustees, employers or professional advisers have failed in their duties and in certain other circumstances. The address of the Pensions Regulator is:

Napier House,
Trafalgar Place,
Brighton,
East Sussex
BN1 4DW

Website: www.thepensionsregulator.gov.uk

Is The Scheme Registered For Tax Purposes?

The Scheme is registered with HM Revenue & Customs for tax purposes. Registration currently gives the following benefits:

- members will usually receive tax relief on their contributions.
- the Scheme's investment return receives favourable tax treatment.
- lump sums are generally payable tax free.

There are no limits imposed by HM Revenue & Customs on the amount of benefits that can be provided from the Scheme nor on the amount of contributions that can be paid in. However, any benefits in excess of the Annual Allowance or the Lifetime Allowance will be taxed.

Can I Use My Benefits As Security For A Loan?

Because of HM Revenue & Customs' requirements, benefits may not be assigned or used as security for a loan. Such action may result in forfeiture of benefits.

Monetary Obligation to Employers

If you are found guilty of any negligent, fraudulent or criminal act or omission against the Company the Company may recover money from your pension rights.

Can The Scheme Be Amended Or Even Discontinued?

The Principal Employer reserves the right to amend or discontinue the Scheme or any section of it at any time. Amendments must be approved by the Trustee and comply with legislative requirements.

If the Principal Employer stops its contributions, the Scheme is discontinued and if the assets of the Scheme (its investments) are not sufficient to cover the Scheme's liabilities (the benefits earned by all the members at that date), current pensions law requires the Principal Employer to pay an amount to the Scheme estimated to secure the benefits members have already earned.

20 Data Protection

The Trustee and the Company have both a legal obligation and a legitimate interest to process data relating to you for the purpose of administering and operating the Scheme and paying benefits under it. This may include passing on data about you to the Scheme's actuary, auditor, administrator and such other third parties as may be necessary for the administration and operation of the Scheme. The Trustee and the Company are regarded as 'Data Controllers' for the purposes of data protection.

Data Controllers are required to provide certain specified information specified information to individuals whose personal data they process. This information is set out in the Plan's Privacy Notice which can be found at: [Comparable Privacy Notice](#).

21 What further information is provided?

You are entitled to receive information on the operation of the Scheme and on your own benefits. Each year the Trustee will issue a report containing details of the Scheme's financial transactions, its investments and any other important developments. A copy of the report is available on the Pensions Portal on the Company's intranet. In addition, employed members will receive an annual statement setting out their own expected benefits on retirement or death.

All members, including pensioners and members with deferred benefits, will be provided with an annual statement, called a summary funding statement, which provides information on the Scheme's funding position.

On retirement, leaving service or death, full details of the benefits due will be provided to you or your dependants (as appropriate) and quotations will be provided for any options you are interested in.

22 Divorce or dissolution of a registered civil partnership

If you get divorced or your registered civil partnership is dissolved part of your pension can be 'earmarked' for your spouse or partner or your pension benefits can be 'shared' with your spouse/partner. The Pensions Department will supply you or your solicitors with the information necessary. Arrangements for dealing with pension rights are complicated so if this situation arises please contact the Pensions Department for further information.

23 State pension scheme

Your Scheme benefits are paid in addition to any benefit you receive from the State pension scheme. See the government website for information about your State pension at www.gov.uk