

# PRIVACY NOTICE FOR THE FUJITSU TELECOMMUNICATIONS PENSION PLAN

We, the Trustee of the Fujitsu Telecommunications Pension Plan (“the Plan”) hold and process personal data about our members and their beneficiaries in order to run the Plan. In doing so, we comply with the General Data Protection Regulation and other relevant UK legislation. This notice is issued on behalf of both the Trustee and the Scheme Actuary, who are both data controllers.

We describe in this Notice the personal data which we collect about you and other individuals (for example, your spouse or beneficiaries), what your personal data is used for, and what your rights are.

## What is your personal data used for?

The Trustee collects and processes your personal data for the purposes of complying with their legal duties to administer the Plan and for other legitimate purposes in relation to the ongoing operation and management of the Plan. This includes:

- Communicating with members in relation to their benefits, responding to requests and queries;
  - General administration of the Plan, including calculating, recording and paying benefits (including any benefits payable to your beneficiaries on death);
  - Meeting the Trustee’s ongoing regulatory, legal and compliance obligations;
  - Risk management purposes such as longevity modelling, managing Plan assets, insurance solutions, member option exercises (including pension increase exchange and transfer value exercises);
  - In connection with the sale, merger or corporate reorganisation of the employers that sponsor the Plan and their group companies;
  - Improving our processes and use of technology, including testing and upgrading of systems.
- bank account details and tax information in relation to your pension benefits;
  - information about your membership of the Plan (for example service dates and benefit amounts);
  - Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death;
  - Information about a criminal conviction if this has resulted in you owing money to your employer or the Plan, and the employer or Plan may be reimbursed from your benefits
  - information about any other pension arrangements you have
  - documentation required for identification checks (for example a passport or driving license)

The Trustee may also hold some special categories of personal data for the purposes of administering the Plan, for example in relation to ill-health or death benefits.

We will only hold this data where it is necessary for us to do so in order to properly perform our duties as Trustee. Should legislation require us to obtain your explicit consent to continue to do this, we will seek your consent at the appropriate time.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by Fujitsu Telecommunications Europe Ltd (the ‘Company’), Fujitsu Services Limited and other organisations, such as HMRC, DWP, other pension schemes, regulatory bodies and tracing organisations.

We also receive information from members about their beneficiaries, who may be eligible to receive benefits on the member’s death.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Plan, please ensure that those individuals are aware of the information contained within this notice.

The Scheme Actuary, currently Matthew Collinson of Isio Group Limited, processes your personal data to undertake various tasks, primarily around scheme funding.

## What personal data do we hold?

We may collect, use or otherwise process the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependant:

- name, gender, address, date of birth, NI number, contact details;

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing. However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

### **Who do we share your information with?**

To comply with our legal duties and for the purposes of Plan administration, the Trustee may share your information with:

- The Plan's administrator (currently Isio Group Limited) who process information to run the Plan;
- The legal advisers to the Trustee, currently Gowling WLG (UK) LLP. Their privacy policy, which sets out how they carry out their obligations in relation to personal data, can be found on their website: <https://gowlingwlg.com/en/>
- The Plan's professional advisors, including the Scheme Actuary, auditor, legal advisor, and any other financial advisor or other organisation appointed to advise you in regard to your options under the Scheme;
- The Plan's insurers and annuity providers, investment managers, banks or other service providers;
- The Company and their professional advisors;
- Statutory and regulatory bodies, including but not limited to HMRC, DWP and tracing organisations.
- Any other person who is authorised to act on your behalf.

In some instances advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data.

Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example, via their websites.

The advisers, service providers and organisations referred to in the paragraphs above may use personal data to perform their functions as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

### **What is our lawful basis for processing your personal data?**

Under data protection legislation, we need to have a lawful basis each time we use, share or otherwise process your personal data.

The Trustee has certain duties and powers which are conferred on it by law or by the Plan's Trust Deed and Rules. In most cases, the processing of your personal data is necessary so that the Trustee can perform those duties and exercise those powers (for example, to pay your benefits).

Certain uses of your personal data, or other processing activities, may not be strictly necessary for the Trustee to perform their legal duties and regulatory responsibilities, or to exercise its powers. However, it may be that certain uses of your personal data are necessary for the purposes of the Trustee's legitimate interests.

When we say "legitimate interests", we mean the Trustee's interests in operating the Plan as properly, efficiently and securely as possible. For example, to manage matters associated with the provision of your benefits under the Plan, including offering you choices as to the form or timing of those benefits.

The Scheme Actuary is appointed under pensions legislation and will use your personal data to undertake various tasks, primarily around scheme funding.

## Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Plan is based on information which may go back many years.

Our policy is therefore to retain personal data about our members and their beneficiaries until after their membership of the Plan ends, and for such longer period as is necessary to enable us to ensure the Plan pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

The data collected from you will usually be stored within the UK or European Economic Area (EEA) except in circumstances where it may be required to transfer that data out with these areas, for example if you live or work somewhere other than the UK or EEA, or if the Plan's service providers host data elsewhere. As these jurisdictions may not offer an equivalent level of protection as is required by EEA countries, appropriate safeguards must be implemented with a view to protecting your data in accordance with applicable laws.

Any transfers of data will be governed by Data protection Laws and all reasonable steps will be taken to ensure that your data is handled safely and in accordance with this privacy notice. Please contact the Trustee, using the contact details below, if you want information about the safeguards that are currently in place.

## Your rights

You have the right to request a copy of your personal data, require that we rectify any errors in the data that we hold, and request that we erase your personal data.

In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere.

You can obtain further information about these rights from the Information Commissioner's Office (details below). If you wish to exercise any of these rights, please contact us using the details provided later.

If in the future we request and obtain your consent, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

## Contact details

If you have any questions about this Notice or would like to exercise your rights in respect of your data, please contact us using the following contact details:

Fujitsu Telecommunications Pension Plan  
c/o Isio Group Limited  
c/o SPS  
PO Box 721  
Salford, M5 0QT

Email: [fujitsupensions@isio.com](mailto:fujitsupensions@isio.com)

## What if you have a complaint?

If you would like to make a complaint about how we have handled your information, please contact us using the details provided above.

If you are not satisfied with our response to your complaint or believe our processing of your data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

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

Website: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

0303 123 1113

## Changes to this privacy notice

The data controllers may change this Notice from time to time and we will notify you of any changes the next time we communicate with you, such as in the Summary Funding Statements that are issued on a regular basis.