

London International Group UK Pension Scheme

Privacy Notice

Who we are

We are the Directors of LI Pensions Trust Limited (“the Trustee”) of the London International Group UK Pension Scheme (“the Scheme”).

As the Trustee of the Scheme, we, together with our appointed Scheme Actuary (currently Mick Howard of Mercer Limited), hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustee and the Scheme Actuary are known as the “data controllers”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender)
- relevant employment information (including current and past salary information and employment dates)
- details about your pension benefits
- medical and other details about your health.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

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How we gather your personal information

We gather personal information from a number of sources including the following:

- directly from the individual concerned
- from the current or former employer of a member or former member
- from persons acting as personal representatives of a deceased person's estate
- from a public body such as HMRC
- from public databases such as the Register of Births, Deaths and Marriages
- from schemes where transfers into the LIG Scheme have been made in the past
- from an independent financial adviser, solicitor, medical professional or other person instructed by a person to provide us with information
- our advisers or others set out in below.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Scheme governing documents, as well as under relevant legislation.

The Scheme Actuary is appointed by the Trustee to value the Scheme's benefits and carry out other calculations in relation to the benefits of members and their beneficiaries. He will use your personal information for this purpose and has a legitimate interest in doing so.

Personal data relating to the Scheme is held on paper and on computer systems. As the "data controllers", the Trustee and Scheme Actuary must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

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Where we store your personal data

The data that we hold will usually be stored inside the UK or European Economic Area (EEA).

However, if you live or work outside of the UK or EEA, we may need to transfer your personal data outside of the UK or the EEA to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

Data may be also be transferred outside the UK or EEA where the Scheme's service providers host data outside the UK or EEA (for example as part of the process of administering the Scheme, data is currently processed on behalf of the Trustee outside of the European Economic area by the Scheme's administrator, Mercer Limited). These transfers will be governed by the Data Protection Laws.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

However, as the Trustee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current, past or future employer which may include group companies which are based outside the EEA. Where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure
- the Reckitt Benckiser pensions manager and Scheme secretary
- the Scheme's professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee
- the Scheme's appointed insurance company and annuity provider(s) (and other insurers or brokers for the purpose of obtaining quotations relating to the Scheme or its benefits), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the Trustee or the Reckitt Benckiser Group to advise you about your retirement options under the Scheme or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Scheme;
- companies within the Reckitt Benckiser group and their professional advisers who may need information for the purposes of compiling or auditing company accounting disclosures;

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- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement
- additional voluntary contributions providers
- depending upon how we pay pensions, BACS (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK and/or Western Union (the administrators' banking providers) when pensions are being paid overseas
- individual, beneficiary or mortality tracing agencies

The Scheme Actuary will also use your personal information to comply with his own legal obligations and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes your information may be used by the Trustee and the Scheme Actuary for statistical research but only in a form that no longer identifies you. In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned earlier in this notice using information which the Trustee has anonymised before sharing it with him.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for longer.

We will hold your personal information on our systems for as long as is:

- necessary for us to fulfil our obligations in respect of the administration of the Fund and any other services and products requested by you;
- necessary to enable us to evidence matters relating to your membership of the Fund such as whether you received a refund of contributions, had a transfer payment made or took a lump sum in place of all or part of your Fund benefits; and
- required by law.

This may mean our processing of your personal information may continue after you have opted out of the Fund or the cessation of any benefits provided to you by us.

We will 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 until 50 years after your death. This will enable us to deal with any questions from you, your beneficiaries and other people who think they might be entitled to benefits in respect of

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you. However, some information may be kept for a shorter period and we will review our records from time to time, for example when you retire, transfer your pension out of the Scheme or die.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Trustee to restrict the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.
- **Withdrawing consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

please contact the Trustee or Scheme Actuary at sslpensionhelpline@mercer.com stating your name, and national insurance number and/or date of birth.

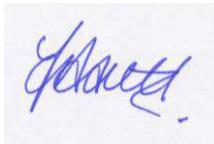
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Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is the latest version as at March 2019. This notice will be updated from time to time and you can ask for a current version at any time by writing to the email address shown above. We will tell you about any significant changes.



Judith Maguire

On behalf of LI Pensions Trust Limited, the Trustee of the London International Group UK Pension Scheme

March 2019