

COMET PENSION SCHEME

Personal information and what we do with it

The Trustee of the Scheme, needs 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 jointly with the Trustee about how your personal information will be used for those purposes. These other parties (our **'Trustee Advisers'**) include Punter Southall Limited and the Scheme Actuary (currently Steve Leake of Punter Southall Limited).

In legal terms, the Trustee and the Trustee Advisers are joint 'data controllers' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what the Trustee does with your personal information, and also what the Trustee Advisers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, 'we' means both the Trustee and the Trustee Advisers where they are acting as joint data controllers in relation to your personal information (as described above).

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment);
- Contact details (including your address, phone number and email address);
- If your benefits from the Scheme derive from your employment, details of 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 benefits due on your death;
- Any information you have provided about who you would like to receive any benefits due on your death;
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes use 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.

Where we get personal information from

Some of the information the Trustee has comes directly from you. The Trustee may also have information (such as your salary and length of service) which has come directly from your previous employer(s). In addition, Punter Southall, who administers the Scheme on behalf of the Trustee, may have obtained information from you and passed it to the Trustee. The Trustee may then in turn pass information about you to the Trustee Advisers or may instruct the administrator to do so. The Trustee is the source of the personal information which the Trustee Advisers have about you.

Sometimes the Trustee gets information from other sources, for example, from another scheme if you have transferred benefits from that scheme, from government departments such as HMRC and DWP and from publicly accessible sources (eg the electoral roll) if the Trustee has lost touch with you and is trying to find you. The Trustee may in turn pass this to the Trustee Advisers (as above).

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

Why we hold personal information and 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 the running of the Scheme.

The Trustee has a legitimate interest in properly administering the Scheme. This includes paying benefits as they fall due, purchasing insurance contracts, communicating with you and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

The Trustee will also use your personal information to comply with these legal obligations, to establish and defend its legal rights, and to prevent and detect crimes such as pension scams or

other fraud. The Trustee may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

In order to achieve this, the Trustee may share your personal information with various people, including any new trustee directors; the Scheme employer; the Scheme administrator; the Trustee Advisers; the Trustee's other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; and IT and data storage providers and other service providers. If your benefits are transferred to another scheme, the Trustee will also need to provide the administrators of that scheme with information about you.

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

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

The Scheme's employer may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustee may share your personal information with the employer so that they can contact you for that purpose.

Actuarial

Our actuaries, Punter Southall Limited, including our individual Scheme Actuary, are classed as joint data controllers with the Trustee when providing certain actuarial and consultancy services. Punter Southall Limited has an appointed Data Protection Officer tasked with ensuring its compliance with data protection legislation. Your point of contact for Punter Southall Limited or the Scheme Actuary is Punter Southall Limited's Data Protection Officer, whose address is 11 Strand, London, WC2N 5HR.

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. He and Punter Southall Limited will use your personal information for this purpose and have a legitimate interest in doing so. They will also use your personal information to comply with their own legal obligations and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

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

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

Some of the people mentioned above just use your personal information in the way we tell them. However, others (including the Trustee Advisers) may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such case, they have responsibilities as data controllers in their own right. This means that they are subject to the same legal obligations as the Trustee in relation to your information, and the rights you have in relation to your information apply to them too.

If you want any more information from the Trustee Advisers or from any other people who receive your personal information from the Trustee, or to exercise any rights in relation to the information they hold, please contact the Trustee and it will put you in touch with them.

How long we keep your personal information for

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 15 years from the end of the Scheme year in which a transfer out occurs or 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;
- in particular circumstances, 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.

To exercise these rights, please use the Trustee's contact details, which are set out below. The Scheme administrator can also supply more information about these rights to you, on request.

The Trustee has agreed with the Trustee Advisers that the Trustee will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise rights against the Trustee and the Trustee Advisers for what they do jointly with your personal information, you should contact the Trustee using the details below.

Keeping your information safe

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).

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact the Trustee via the Scheme administrator at:

- Address: Comet Pension Scheme, PS Administration Limited, Albion, Fishponds Road, Wokingham, Berkshire RG41 2QE
- Email: cometadmin@psadmin.com
- Telephone: 0330 202 0770.

If you have concerns about the way we handle your personal information, 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.