

Amadeus Services Limited Pension & Life Assurance Plan Privacy Notice

Purpose of this notice

This privacy notice aims to give you information on how the personal data regarding your membership of the Amadeus Services Limited Pension & Life Assurance Plan is collected and processed.

It is important that you read this privacy notice together with any subsequent privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice overrides any privacy notice sent to you previously.

We may update this privacy notice from time to time. We will provide you with a new privacy notice when we make any substantial updates.

Data Controller

We, the Trustee of the Amadeus Services Limited Pension & Life Assurance Plan, will be the “data controller” of the personal information collected and used by the Plan. This means we are responsible for deciding what personal data about you is required and how it should be protected.

In addition, the Plan Actuary (Kiran Mandal) and our actuarial advisers (First Actuarial) are also data controller for the personal data that they use. This privacy notice also covers these data controllers. Our Auditors (Assure UK) are also data controllers for the personal data they use to carry out their duties. Their Privacy Notice setting out how they process personal data can be found at <https://assureuk.sharefile.com/d-s51f6409b84f4753b>.

What personal data do we hold and use?

We hold personal data on you to enable us to calculate and pay benefits to you or your dependants. The information will also be used, where necessary, for the financial management of the Plan.

The information we hold on you includes:

- details of your employment history, including salary information
- personal information including name, maiden name, date of birth, National Insurance number and contact details
- records of any benefits you have transferred into the Plan from other pension arrangements
- records of any additional contributions you or the employer, on your behalf, have paid into the Plan
- information on benefits you will receive from the Plan
- your bank account details (but only from the time we need to start paying benefits to you)

We may also hold more sensitive personal data such as:

- health information collected when considering whether to pay any ill-health benefits
- information about your spouse/partner that may indicate your sexual orientation, such as copies of marriage certificates or information held within death benefit nomination forms

- information about a criminal conviction if that has resulted in you owing money to your employer or the Plan and the employer or the Plan may be reimbursed from your benefits

Why do we hold your personal data?

We hold this information for the proper administration and management of the Plan. The legal basis for our use of the data will generally be one or more of the following:

- processing your personal data is necessary for compliance with our legal obligation to administer the Plan
- we have a legitimate interest in ensuring that you and/or your dependants get the benefits you are entitled to receive, to ensure that the Plan is well run and has sufficient funds to pay the benefits promised
- the processing is necessary for the performance of a contract to which you are a party.

Where we obtain more sensitive data listed above, we will normally only do so with your consent. You may withdraw that consent at any time, in which case we may erase that sensitive data if possible and if we have no other lawful reason to keep it. However, if we consider that doing this will prevent us from paying the correct benefits to you or your dependants, we will let you know before proceeding.

We will also receive information from you about your proposed beneficiaries, who might be eligible to receive benefits on your death. Please ensure that those individuals are aware of the information contained within this notice. We assume that you have the consent of those individuals to provide us with any sensitive information about them.

The Plan Actuary and First Actuarial also hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing actuarial advice, valuations and investment advice for us. For example, the Plan Actuary carries out calculations to advise us if the Plan has enough money to pay the future benefits promised to its members.

Where did we get personal data about you?

The personal data we hold about you was given to us by:

- **The employer**, who provided us with data such as your salary information, part-time working details, and information on when you joined and left employment.
- **You**, for example, through the forms which you completed when you joined the Plan. You (or your family members) may also have provided information subsequently when you contacted the Plan to discuss your benefits, to tell us about a change of address or for other reasons.
- **Other sources of data could be:**
 - Previous employers and previous pension schemes, where you transferred your benefits into the Plan. This will include information such as your dates of service, contracted-out benefits (if applicable) and contributions;
 - Tracing agencies to provide address information if we have been unable to contact you;
 - Doctors to provide medical information in respect of benefit claims;
 - Anyone who might be entitled to benefits as a result of their connection with you; family members or personal representatives;
 - People who have named you as their potential beneficiary in relation to their own pension benefits;
 - Government bodies or departments such as HMRC.

How will we use your personal data?

We may use this data to deal with all matters relating to the Plan, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you
- to assess eligibility for, calculate and provide you (and, if you are a member of the Plan, your beneficiaries upon your death) with benefits
- to identify your potential benefit options and, where relevant, implement those options
- to allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements
- to comply with our legal and regulatory obligations as Trustee of the Plan
- to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Plan
- the management of the Plan's liabilities, including the entering into of insurance arrangements and selection of Plan investments
- for statistical and financial modelling and reference purposes
- in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Plan and their group companies

Who do we share your personal data with?

To run the Plan, your personal information will be used by the Plan Administrator and our advisers, as necessary (including the Plan Actuary, actuarial advisers, auditor and legal advisers). We may also need to share your personal information with other parties such as annuity providers, firms providing death-in-service insurance services for the Plan and tracing agencies (for example, if you move to a new house and don't tell us your new address). Where we do share information with these parties we remain in control of the data and we will ensure that suitable data protection agreements are in place.

We may transfer your data to separate third parties. These parties are:

- official organisations who we have a legal obligation to provide information to or if we consider disclosure to these organisations is reasonable. This includes HMRC, the Pensions Regulator, the Pensions Ombudsman and the Pension Protection Fund
- insurance companies, for example, if we buy an annuity on your behalf
- providers of investments to aid in assessing the plan's liabilities as well as for statistical and financial modelling
- other pension schemes, if you ask us to transfer your benefits to a new scheme
- the Employer, or their advisers, to enable them to manage their financial commitment to the Plan, to produce pension related accounting disclosures and to allow them to answer questions you may have about your benefits or to give you guidance on pension related matters.

We only share information about you where it is necessary for the running of the Plan. We do not share information about you for any other reason.

How long do we keep your data?

We retain your personal data for as long as necessary to fulfil our obligations to you and your potential beneficiaries, and to comply with legal and regulatory requirements.

In practice, we retain your data as follows:

- Active members: throughout your membership
- Deferred members: until benefits commence or are transferred
- Pensioner members: as long as we are paying you a pension
- Dependants: personal data is retained until we pay them a benefit or their information is updated by you
- After benefits cease (or you transfer out): we will retain your personal data for a minimum of seven years to address potential claims and meet regulatory requirements

The Plan Actuary and the actuarial advisers also keep a copy of your personal data. Should we change our Plan Actuary or actuarial advisers, the existing provider will keep a copy of the data for a minimum of one year and a maximum of seven years.

Your Rights Under UK GDPR

Under the UK GDPR, you have the rights to:

Access Your Information

You can request a copy of the personal information we hold about you at any time. This is called a Subject Access Request. We will respond within one month.

Correct Inaccurate Information

If we hold incorrect information about you, you can ask us to correct it. Please contact us as soon as possible if any of your details change.

Request Deletion

In some circumstances, you can ask us to delete your information. However, we may need to retain it to meet legal and regulatory requirements for pension schemes.

Restrict How We Use Your Information

You can ask us to restrict how we use your data in certain circumstances, such as while we investigate a complaint about data accuracy.

Object to Processing

You can object to how we use your information. However, we may not be able to stop processing your data if it is necessary to:

- Administer the Plan and pay your benefits
- Comply with legal obligations
- Meet regulatory requirements

In these cases, we will explain why we need to continue processing your data.

Data Portability

You have a limited right to receive your data in a structured, commonly used format.

Right to Complain

You have the right to contact us or our data protection officer (if appointed) if you have any concerns with how we use your personal data. We will acknowledge your complaint within 30

days of receipt and will do our best to resolve your concerns. You do not have to make your complaint in a specific way but, for quicker resolution, we encourage you to send in your complaints to peterborough.admin@firstactuarial.co.uk.

You also have a right to complain to the Information Commissioner's Office (ICO) if you believe that our use of your personal data is in breach of data protection laws and/or regulations. More information can be found on the ICO's website, <https://ico.org.uk/>

Exercising this right will not affect any other legal rights or remedies you have.

Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Plan so that we can continue to pay you benefits when due, and contact you about your membership of the Plan. In particular, please let us know if you move home, so that we can stay in touch with you.

Contacting us

You may contact us for further details on how we use your personal information, or with any other questions about this privacy notice, including any requests to exercise your rights, via the Plan Administrator whose contact details are:

First Actuarial LLP
2nd Floor Office, Orton Pavilion,
Peterborough Business Park,
Lynch Wood,
Peterborough,
PE2 6FY

peterborough.admin@firstactuarial.co.uk

Directors of The Amadeus Pension and Life Plan Trustee Limited as
Trustee of the Amadeus Services Limited Pension & Life Assurance Plan

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