

CABLE & WIRELESS SUPERANNUATION FUND (THE "SCHEME")
PRIVACY NOTICE – PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR SURVIVORS

As Trustee of the Scheme we need to collect and use personal information about our members and their survivors. This privacy notice sets out how we collect, use and protect your personal information and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

1. PERSONAL INFORMATION WE USE

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Scheme's employers and information we get from other sources, including public databases.

1.1. What Information may we collect directly from you?

The categories of personal information that we collect directly from you include:

- (a) personal details (for example, your name, date of birth);
- (b) your bank details and national insurance number;
- (c) your contact details (for example, your address, phone number and email address);
- (d) details about who you would like us to consider paying benefits to if you die;

1.2. What information may we collect from other sources (such as your employer)?

These are examples of categories of information we may collect from other sources:

- (a) personal details (for example, your name, date of birth);
- (b) your contact details (for example, your address, phone number and email address);
- (c) information necessary to calculate and pay your contributions or benefits (for example, your employment history and salary).

1.3. How will we use your personal information and why?

The ways we use your information include:

- (a) identifying you and your survivors and making sure your details are up to date;
- (b) communicating with you;
- (c) calculating and paying your benefits;
- (d) making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death;

We must have a legal reason to use your personal information. This will usually be one of the following:

- (e) to fulfil our legal obligations such as giving you specified information about your benefits as required by pension legislation;
- (f) to meet our legitimate interests to administer the Scheme efficiently and to pay benefits to you and your survivors in accordance with the scheme rules;
- (g) because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health, we need your consent to process your data. Where this applies, you may take back your consent at any time by contacting Isio Group Limited, details as below:

Isio Group Limited
AMP House
Dingwall Road
Croydon
CR0 2LX

Web: <https://cwcpensions.com/>
Email: cwcpensions@ISIO.com
Telephone: 0800 122 3490

2. INFORMATION SHARING

2.1. We may share personal information with:

- (a) the Scheme's administrators and our advisers (such as the scheme actuary and our legal advisers) to facilitate the administration of the Scheme and your benefits;
- (b) Her Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund;
- (c) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes.

2.2 We may also provide some of your personal information to Scheme employer group companies to help them to make decisions relevant to their role as sponsoring employers. We will only do so to the extent we consider necessary for these purposes.

3. SECURITY AND STORAGE

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

We will keep your personal information for as long as we have a relationship with you or your survivors. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

4. YOUR RIGHTS

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us.

5. INTERNATIONAL DATA TRANSFER

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law. Where your personal information is to be transferred outside the UK (for example by the administrator) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

6. CHANGES TO THIS POLICY

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are notified to members by post and posted on the website.

7. HOW TO CONTACT US

- 7.1. The Trustees are the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact Isio, as scheme administrators.

Isio Group Limited
AMP House
Dingwall Road
Croydon CR0 2LX

Web: <https://cwcpensions.com/>
Email: cwcpensions@ISIO.com
Telephone: 0800 122 3490

- 7.2. If you believe that we have not resolved your concerns, you can complain to the Information Commissioner's Office at www.ico.org.uk
- 7.3. We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.