

MERCER MASTERTRUST

FAIR PROCESSING NOTICE

What is the purpose of this Notice?

The purpose of this Notice is to inform members of the Mercer Mastertrust (the "**Mastertrust**") about how the trustees of the Mastertrust (the "**Trustees**") use member personal data.

The Trustees are a "controller" of the personal data that they hold about members (and their spouses and dependents) for the purposes of data protection legislation. This means the Trustees are obligated to make certain information available to members about how they use personal data, which is set out in this Notice.

What data do the Trustees hold about members?

The data held by the Trustees about members includes:

- Personal details such as member title, full name, gender, date of birth, home address including postcode, national insurance number, bank account details, marital status, country of residence and information about your beneficiaries.
- Information relating to member funds/benefits including your member identifying number, your policy number, scheme name, scheme reference, the date you joined your employer and the date you joined the Mastertrust, details of your employer, your pensionable salary, the category and value of contributions made (including transaction history, fund holdings, fund values and total value of policy), your account status, selected retirement age and selected retirement date, and any relevant matters impacting member funds/benefits such as pension sharing orders, tax protections or other adjustments.
- Health details in relation to any claim for ill health retirement or incapacity.
- Records of communications with members.
- In rare cases, information relating to convictions or offences.

How do the Trustees obtain member data?

The Trustees will obtain most of this information directly from members. We also obtain information from employers, other pension schemes (where members are transferred to the Mastertrust from another pension scheme), tracing agents, insurers and insurance brokers, service providers and medical advisers.

How do the Trustees use member data?

The Trustees only use member data in the following circumstances:

1. where the Trustees need to use member data to comply with their legal obligations and duties under the trust deed and rules governing the Master trust and to provide members with benefits in accordance with the Mastertrust rules;

2. where the Trustees need to use member data to comply with a legal obligation; or
3. where the Trustees need to use member data for legitimate interests pursued by the Trustees or a third party and member interests and fundamental rights do not override those interests.

The situations in which the Trustees will process member personal data are listed below:

- To manage internal systems, processes and use of technology, including testing and upgrading of systems. We do this because we have a legitimate interest in ensuring that our systems and processes operate correctly and effectively.
- We will provide members with updates about the Mastertrust, through newsletters and obtain your feedback about its operation. We do this because we have a legitimate interest in keeping members up to date with developments affecting the Mastertrust and to check we are running it effectively. Members can ask us to stop these communications as set out below.
- To provide members with access to engagement platforms, from which members can assess information about their contributions, entitlements and benefits online. We do this as we have a legitimate interest in being able to provide this information to members in an easily accessible format.
- We will try to locate members if members move address without providing us with new contact details. We do this as we have a legitimate interest in being able to contact members about the Mastertrust and an obligation to pay member benefits.
- We will seek to confirm if members are still entitled to their benefits by confirming that members are still alive and that member dependants are still entitled to any benefits. We do this as we have a legitimate interest in only paying benefits to those entitled to them.
- We disclose member information to third parties at your request, as set out in further detail below. This includes disclosure of member data in relation to transfers to other schemes where we have been instructed to do so.
- We will use member information in order to prevent or detect crime. We do this because we have a legitimate interest in protecting the Mastertrust from criminal activity. We will also disclose member information to third parties where we are required to disclose that information by law or by an Order of The Court.
- We will undertake activities from time to time to help us operate the Mastertrust in accordance with the authorisation and supervisory regime for master trusts. We do so because it is in our legitimate interest to ensure that the Mastertrust maintains authorisation from the Pensions Regulator to operate as a master trust.
- We will consider requests by member to access their benefits on the grounds of ill-health. This will require us to consider health information about members. Members may be asked to consent to this use at the time such benefits are requested.
- We will keep details of any beneficiary nominated to receive member benefits. Members will be asked to ensure that any beneficiaries are informed about this when they submit a nomination. where the Trustees need to use member data to comply with their legal obligations and duties under the trust deed and rules governing the Master trust and to provide members with benefits in accordance with the Mastertrust rules;

- where the Trustees need to use member data to comply with a legal obligation; or
- where the Trustees need to use member data for legitimate interests pursued by the Trustees or a third party and member interests and fundamental rights do not override those interests.

Do the Trustees share member data with anyone else?

In order to carry out the activities listed above, the Trustees need to disclose member data to the following third parties:

- Service providers who hold and process member data on our behalf. In particular:
 - Aviva Life & Pensions UK Limited ("**Aviva**") act as scheme administrator of the Mastertrust and also provide investment services to the Trustees. Aviva also further disclose member data to third parties where they sub-contract the services provided to us, or when they are using member data for their own purposes. More information regarding this can be found by contacting them at the details noted below.
 - Member data is also held by Mercer Limited ("**Mercer**"), which is the founder and scheme funder of the Mastertrust and is responsible for providing certain administration, scheme management and investment services to the Trustees. Mercer is also responsible for providing engagement platforms for certain members where this has been agreed with their employer, and we have instructed Aviva to share member data with Mercer for this purpose. Mercer also further disclose member data to third parties where they sub-contract the services provided to us, or when they are using member data for their own purposes. More information regarding this can be found by contacting Mercer at the details noted below.
- Professional advisers, to obtain legal, actuarial, investment, audit and medical advice;
- Tracing agents who locate missing members;
- Certain government departments and public bodies, such as HMRC and the Department of Work and Pensions;
- The Pensions Ombudsman and the Money and Pensions Service, where members have sought their advice or review;
- Employers and former employers of members;
- Insurance and reinsurance companies (for instance, to arrange life assurance cover or an annuity policy), and independent financial advisers; and
- Third parties to whom you ask us to disclose your information, for example where you wish to transfer your pension.

Is member data ever transferred outside of the UK?

The Trustees may need to transfer member data to countries that are outside the UK and the European Economic Area ("**EEA**") if this is how our service providers process member data. The Trustees will only transfer your data outside the EEA where either:

1. the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your data; or

- the Trustees have put in place sufficient measures to ensure adequate security as required by data protection laws. These measures include putting in place appropriate contractual protections consistent with data protection laws. You can find out more about these safeguards by visiting the Information Commissioner's Office ("ICO") website at www.ico.org.uk and searching for 'International transfers'.

How long will this data be held for?

The Trustees will only retain your information for as long as necessary to fulfil the purposes it is collected for, including for the purpose of satisfying any legal, accounting or regulatory requirements. Due to these requirements, policy records for members will in most cases be held indefinitely. In some limited circumstances, such as where personal data is captured but no policy is established, or where a policy is cancelled, information may be held for a shorter period.

If you would like further information about how long your personal information is retained, please contact the Trustees using the details below.

What rights do members have over their data?

Under certain circumstances, by law members have the right to:

- Request access to personal data** (commonly known as a "data subject access request"). This enables members to receive a copy of the personal data we hold about them and to check that we are lawfully processing it.
- Request correction of the personal data that we hold.** This enables members to have any incomplete or inaccurate information we hold corrected.
- Request erasure of personal data.** This enables members to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Members also have the right to ask us to delete or remove personal data where members have exercised their right to object to processing (see below).
- Object to processing of personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of personal information.** This enables members to ask us to suspend the processing of personal data, for example if a member wants us to establish its accuracy or the reason for processing it.
- Request the transfer of personal data to another party.**

These rights can be exercised by contacting the Trustees using the contact details noted below.

Contact us

It is important to inform the Trustees of any changes in your personal details to ensure the information held is kept accurate and up to date.

If you wish to update any of your personal details, or if you would like to know more about what information is held about you and how this information is used, or if you have an enquiry regarding how the Mastertrust is administered, please contact **Aviva** on behalf of the Trustees using the following contact details:

- **Telephone:** 0345 600 6303
- **Email:** mymoney.questions@aviva.com
- **Address:** Aviva, PO Box 2282, Salisbury, SP2 2HY

If you want to know more about the information held in connection with your engagement platform, or the purposes for which it is held, please contact **Mercer** using the below contact details:

- **Telephone:** 0330 808 9426
- **Email:** money@mercerc.com

What if I have a complaint?

If you have a complaint about the Trustees' management of your data, you have the right to lodge a complaint with the ICO, which can be contacted on 0303 123 1113 or via other methods of communication as explained on their website (currently <https://ico.org.uk>).