

Telefónica UK Pension Trustee Limited

Telefónica UK Pension Plan

Who we are

Telefónica UK Pension Trustee Limited is the trustee (“the Trustee”) of the Telefónica UK Pension Plan (“the Scheme”).

As the Trustee of the Scheme, we 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 is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

The Scheme Actuary, Bart Huby of Lane Clark & Peacock LLP (LCP) is also a data controller in respect of personal data that he uses to carry out his functions. For further information on LCP please see <https://www.lcp.uk.com/privacy-policy/>

Standard Life are the administrators of the Defined Contribution (DC) section of the Scheme. For further information on Standard Life please see https://www.standardlife.com/sl/privacy-policy.page?utm_source=vanity&utm_medium=redirect&utm_campaign=privacy

LCP and Standard Life when acting in their capacities as the administrators of the Scheme appointed by the Trustee are “data processors”.

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, date of birth and 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 and values
- medical and other details about your health (physical or mental)
- details on any divorce orders and powers of attorney
- your race/ethnicity

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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.

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. Your personal data will generally be collected directly from you or from your employer. We will not collect any personal data that we do not need.

Personal data relating to the Scheme is held on paper and on computer systems. As the “data controller”, the Trustee 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 the 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.

When we are asking for your feedback on services we may also ask you to consent to us processing your personal data if there is not an alternative legal basis for processing.

Who we share it with

The Trustee, the Scheme Actuary and the administrators, as listed above, will share your personal data with each other as necessary and with other advisers and service providers used to help administer the Plan. This may include the Scheme’s: legal advisers, investment advisers, auditors and accountants. It may also include other organisations such as tracing, archiving, document printing and distribution and IT service providers. If you require details of any of these advisers/providers please contact us using the details given below.

In some circumstances, we may need to pass personal information to other third parties who advise or assist the Trustee and the Scheme Actuary, the sponsoring employer and any business associated with it, prospective purchasers of any of them (although in this latter case, where practicable, the data is anonymised), Government bodies, fund providers, insurance companies and persons associated with you. In the event that any such third party processes personal information, reasonable steps will be taken to ensure that such third party agrees in writing to act only on our instruction and provides appropriate guarantees in respect of the technical and organisational security measures governing the processing to be carried out.

This may also involve transferring personal data to countries outside the European Economic Area (the “EEA”) and where that is the case reasonable steps will be taken to ensure that the processing

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of any personal data by the third party, including the transfer to the third party complies with the data protection laws and regulations.

We may also pass personal information to other third parties at your request, for example where you are considering a possible transfer and you have asked us to provide information to your adviser and/or to the administrators of the receiving arrangement. In this situation we will assume that you have satisfied yourself that the third party has suitable security measures in place.

We do not carry out any automated decision making using your personal data and we will not use or share your data for marketing purposes.

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 the rest of your life.

However, we review the personal data held in relation to the Scheme on a regular basis. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

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 limit 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.

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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 Robert Harwood, the Secretary to the Trustee, by email at robert.harwood@telefonica.com

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 25 May 2018. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at telefonicapensions.com/data. Alternatively, if you would prefer to receive a hard copy of the notice, please let contact the Secretary to the Trustees, (see "Who to contact" above).