



## **PRIVACY NOTICE FOR THE ATOS UK 2019 PENSION SCHEME (the “Scheme”)**

The Trustee, Atos Pension Schemes Limited, holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, the Trustee complies with relevant data protection legislation.

### **What we do with your data**

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme, which include: the calculation, administration and payment of benefits under the Scheme before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, investment of the Scheme’s assets, or dealing with any queries or complaints regarding benefit entitlements. In addition, the Trustee may apply Lifestyling if you have defined contribution assets in the Scheme, details of which were provided to you when you joined either the Atos Pension Fund or the Atos (Sema) Pension Scheme.

The legal basis for processing your data is in order for the Trustee to comply with its legal obligations, and other legitimate interests, such as the efficient management of the Scheme. The Trustee also processes personal data for other legitimate purposes relating to the operation of the Scheme, for example this could include changes to benefit design or de-risking exercises.

Whilst much of the data the Trustee holds has been provided by members themselves, it also holds and processes data provided by Atos IT Services UK Limited as the Scheme’s principal and sponsoring employer (the “**Employer**”), former employers in the Scheme, previous pension schemes, HMRC, the General Registrar’s Office, the DWP and regulatory bodies and by tracing organisations. The Trustee also receives information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death. We assume that you have the consent of those individuals to provide us with this information and you may wish to share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly discharge our responsibilities in respect of such benefits.

The data the Trustee holds is to assist it to calculate and pay the benefits the members are entitled to, and this includes: your name, email address, postal address, national insurance number, mobile number, landline number, gender, date of birth, financial data and details from your period of employment with the Employer (or alternatively with a different employer within the Atos group) and membership of the Scheme (e.g. your income and/or benefits, assets, defined contribution investment selections, bank account details), family, lifestyle and social circumstances (e.g. marital status, details of family members), and employment (e.g. employment history, recruitment and termination details relating to your period of employment with the relevant employer).

The Trustee also holds some special categories or “sensitive” data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits, or biometric data for the confirmation of your identity and address if you are resident outside of the UK). The Trustee will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of its legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where the Trustee seeks your explicit consent to process sensitive data then you can withdraw it at any time.

## **Who else processes your data?**

The Trustee shares your personal data with certain third parties involved in running the Scheme, for example, Independent Trustee Services Limited, part of Independent Governance Group, as corporate director of the Trustee, XPS Pensions Consulting Limited as Scheme Secretary, Hymans Robertson LLP (“**Hymans**”) as Scheme Administrator and any other parties necessary for the administration of the Scheme, Martin Bell of Willis Towers Watson Limited as Scheme Actuary, CMS as the Trustee’s legal advisers, KPMG as the Scheme’s auditors, Isio as the Scheme’s data services provider, investment advisers, investment managers, communication printers, tracing organisations, AVC and defined contribution fund providers and administrators, independent financial advisers, the Trustee’s indemnity insurers, the Scheme’s death in service insurer (if applicable), bank account providers, document sharing services (to facilitate access to documents by the Trustee and its advisers), the Employer, and governmental and regulatory bodies, for example, HMRC, the Pensions Ombudsman, the Pensions Regulator and the Money and Pensions Service

In some circumstances the Trustee is a joint controller with the Scheme Actuary, the legal advisers (who will process personal data to comply with their professional duties as advisers to the Trustee), and the Employer. The Employer holds your data to comply with its legal obligations as the employer and principal employer of the Scheme. They have a legitimate interest in the Scheme being run in a cost effective way and may have an interest in offering certain options to members. The Trustee will share information with the Employer and its auditors and advisers for this purpose.

The Employer and certain advisers will from time to time transfer data to other countries, including outside the United Kingdom. Where such transfers are made, the parties involved will ensure adequate safeguards are in place. In this regard, the Scheme’s actuarial advisers Willis Towers Watson have, since September 2022, made use of its Indian service centres to help support the activities undertaken for the Scheme and its members by the UK actuarial team. Contractual arrangements have been put in place including the EC Standard Contractual Clauses and the International Transfer Data Agreement addendum, as permitted by the Information Commissioner’s Office, to regulate the sharing of Scheme personal data with the Indian service centres. Technological and operational measures have also been put in place in line with Willis Towers Watson’s global policies to help protect the security and integrity of Scheme personal data shared with the Indian service centres.

## **Storage of your personal data**

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. The Trustee will retain information relating to you whilst you are a member and will store this information for as long as the Trustee needs it.

Once your membership ends, the Trustee may decide to delete some of the data held in relation to you after an appropriate period. However, information may be held for longer where the Trustee considers it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Hymans will delete or return personal data to the Trustee after the termination of the contract with the Trustee but may continue to hold personal data where it has a lawful basis for doing so.

## **Your rights**

You have the right to access your personal data and require that the Trustee rectifies any errors in the data that it holds, or request that the Trustee erase your personal data. In some circumstances, you

can also require that the Trustee restricts the way the Trustee processes your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where the Trustee has requested and obtained your consent to process particular information, you may withdraw that consent at any time. However if the Trustee does not hold all the data it needs to administer your benefits, it may not be able to pay out the benefits you are entitled to. You can exercise your rights by using the contact details below.

### **Contact details**

If you require further information, the contact details of the Trustee are:

Address: Atos UK 2019 Pension Scheme, Hymans Robertson LLP, Administration Team, PO BOX 27169, Glasgow, G2 9NE

Email: atos@hymans.co.uk

Telephone: 0121 212 8151

Please use the above contact details if you would like to contact any other controllers listed in this notice.

### **What if you have a complaint?**

To make a complaint about how the Trustee has handled your information, contact the Trustee as set out above.

If you are not satisfied with the Trustee's response to your complaint or believe its processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745

This notice is the latest version as at March 2025.