



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.

This notice is not confirmation that you will receive any financial benefits in the Scheme and in no way gives you any entitlement to benefits in the Scheme.

What we do with your data

The Trustee is a data controller. As you are a beneficiary or potential beneficiary in the Scheme 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, carrying out actuarial valuations, investment of the Scheme’s assets, or dealing with any queries or complaints regarding benefit entitlements.

The legal basis for processing your data as a beneficiary or potential beneficiary is in order for the Trustee to comply with its legal obligations (including processing death benefit claims), 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.

The data the Trustee holds will mostly be provided by you (or the Scheme member) and is used to assist the Trustee to calculate and pay the benefits the beneficiaries and potential beneficiaries are entitled to, and this includes: your name, email address, postal address, national insurance number, mobile number, landline number, gender, date of birth, family, lifestyle and social circumstances (e.g. marital status, details of family members), and payment details in order to pay benefits (e.g. bank account details, name of bank etc.).

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. Data may also be received from the employers about beneficiaries or potential beneficiaries via expression of wish forms they hold or in the event of death cases involving sensitive personal data.

The Trustee also holds some special categories or “sensitive” data about beneficiaries and potential beneficiaries for the purposes of administering the Scheme (which may include biometric data for the confirmation of your identity and address if you are resident outside of the UK) and providing death benefits. 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, investment advisers, investment managers, communication printers, tracing organisations, AVC and defined contribution fund providers and administrators, independent financial advisers, the Trustee’s indemnity insurers, bank account providers, document sharing services (to facilitate access to documents by the Trustee and its advisers), and governmental and regulatory bodies, for example, HMRC, the Pensions Ombudsman, the Pensions Regulator and the Pensions Advisory Service, and the Employer.

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 and beneficiaries. 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

Where you are provided with any benefit from the Scheme the Trustee's policy is to keep any information relating to you until at least payment of your benefits ceases, save that biometric data processed for the purposes of verifying your identity and address will be held for as long as the Trustee needs it.

Once any payment of benefits ceases, the Trustee may decide to delete some of the data after an appropriate period. However, information may be held for longer where the Trustee considers it appropriate in order to deal with any queries relating to benefits that may arise after that time.

Personal data regarding potential beneficiaries may be provided to help assist the Trustee’s consideration of how discretionary benefits should be distributed following the death of a member but no benefit is ultimately awarded to the individual concerned. Where this occurs, it is similarly the Trustee’s policy to keep any information relating to that individual until at least any benefits have been

distributed. Once those benefits have been distributed, the Trustee may decide to delete the data after an appropriate period. However, information may be held for longer where the Trustee considers it appropriate in order to deal with any queries relating to the distribution of those benefits that 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 needed to administer your benefits, it may not be able to pay out any benefits due.

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 545 700

This notice is the latest version as at June 2023.