



NOVEMBER 2017

Unilever UK Pension Fund (the 'Fund')

# Personal data privacy statement

## Background

**The Trustee Directors of Unilever UK Pension Fund Trustees Limited (the Trustees) are required to collect and use personal data in order to administer the Unilever UK Pension Fund (the 'Fund') effectively and to meet certain employer and member requirements.**

Such data may relate to Fund members (including active members, deferred members, pensioner members, pension credit members and member beneficiaries) and their relatives, nominated beneficiaries and dependants, Unilever Group companies' employees, suppliers and professional advisers with whom the Trustees conduct business, and the Trustees themselves (data subjects). The Trustees are the 'data controller' of personal data which is the subject of this notice, and their contact details are set out overleaf.

All personal data that the Fund collects, records or uses in any way, whether held on paper, on computer or other media will be the subject of appropriate safeguards to ensure that the Trustees comply with the applicable data protection laws.

The purpose of this statement is to provide information which the Trustees are required to make available to data subjects.

## Purposes of processing

The personal data processed by the Trustees is used to administer the Fund effectively and to meet certain employer and member requirements. The legal basis for this processing is the legitimate interests of the Trustees in administering the Fund and/or (in some cases) that the processing is necessary for compliance with a legal obligation to which the Trustees are subject. If appropriate personal data is not received by the Trustees they may be unable to provide some or all of the benefits to which a member is otherwise entitled.

## Types of data processed by the Trustees

The type of personal information held by the Trustees which constitutes personal data include:

- Data subject's full name;
- Home address and other contact details;
- Gender;
- Date of birth;
- Marital (or relationship) status;
- National Insurance number;
- Annual (or pensionable) salary;
- Other forms of remuneration;
- Bank account details;
- Benefit entitlements; and
- Death benefit nominees.



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## Sources of the personal data processed by the Trustees

The data processed by the Trustees is provided primarily by the data subjects themselves, as described overleaf. Other information may be provided by current and former employers of Fund members, other pension schemes and pension providers, independent financial advisers, medical practitioners, other advisers with whom the Trustees communicate in relation to the administration of the Fund, and Her Majesty's Revenue and Customs (HMRC).

## Persons to whom the personal data may be disclosed

The Trustees may disclose personal data to actuarial and other financial advisers where this is required in order to administer the Fund, and to providers of other professional services, regulatory authorities and healthcare practitioners, insurers, employers of data subjects, HMRC, the Pensions Regulator, other pension schemes, independent financial advisers and any other persons to whom the data subjects have authorised the data to be disclosed.

The Trustees may also provide personal data to suppliers of data processing or administration services, to whom certain tasks associated with the administration of the Fund have been outsourced. These entities may transfer personal data to countries outside the European Economic Area. The Trustees have contracts with all such third parties, which confirm that the service providers agree to comply with certain obligations under the data protection laws, primarily in relation to security measures surrounding the data that they process for the Trustees.

Personal data may also be provided to potential or actual acquirers of any Unilever Group company or business, subject to appropriate measures having been taken as regards the confidentiality of the data, and to other members of the Unilever Group of companies.

### Period for which data is retained

The Trustees will retain personal data for periods determined in accordance with formal policies (adopted from time to time) laying down procedures for reviewing whether categories of personal data are still required to be retained for the purposes of effectively administering the Fund, including the provision of benefits under it.

### Data subject access requests

All data subjects have a right:

- to be told about the data that the Trustees hold about them and to receive a copy of the information that constitutes personal data about them, on request;
- to request access to and rectification or erasure of personal data, restriction of processing concerning the data subject and the right to data portability (as set out in, and subject to limits imposed by, applicable data protection laws);
- to withdraw consent to processing, to the extent that processing is based on consent;
- to lodge a complaint about processing with the UK data protection supervisory authority (the Information Commissioners Office).

If you wish to exercise this right, or wish to contact the Trustees about your personal data, you should submit a written application to the Service Delivery Manager (SDM), Unilever UK Pensions, Unilever House, Springfield Drive, Leatherhead, KT22 7GR, or at the following email address: [expertadminteam@unilever.com](mailto:expertadminteam@unilever.com).