

Unilever UK Pension Fund (the "Fund")

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# **Privacy Statement**

The purpose of this privacy statement is to help you understand how we collect, store and use your personal information for the purposes of the Fund.

## 1. Background

The Trustee Directors of Unilever UK Pension Fund Trustees Limited (registered number 03888847) (together referred to in this statement as the "**Trustees**", "**we**" or "**us**") collect and use information from which you can be identified ("personal information") in order to administer the Fund.

Such personal information may relate to Fund members (including active members, pensioner members, pension credit members and member beneficiaries) and their relatives, nominated beneficiaries and dependants (for the purposes of this statement, "you").

We are committed to ensuring your personal information is handled in accordance with the "data protection legislation" (meaning the UK Data Protection Act 2018, the UK GDPR (as defined in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019/419), the Privacy and Electronic Communications (EC Directive) Regulations 2003, and all similar or related legislation relating to the processing of personal information and/or privacy applicable to us).

This statement provides you with information regarding when, from whom and why we collect your personal information, as well as how we use it.

The Trustees, as the data controller, are responsible for the personal information which is the subject of this statement and can be contacted using the details set out in Section 10.

#### 2. Personal information we collect

The types of personal information that the Trustees may collect and use include:

- Your full name, address and contact details
- Your gender
- · Your date of birth

- Your marital/civil partnership (or relationship) status
- Your National Insurance Number and/or other evidence of identity
- · Details of your salary and other forms of remuneration
- Details of your bank account
- · Your benefit entitlement under the Fund
- Details of any nominees (potential beneficiaries) to be considered for benefits in the event of your death.

In some limited circumstances, the Trustees may collect and use special categories of personal information, but will only do so with your express consent. We will make clear to you when your consent is needed.

# 3. What do the Trustees do with your personal information?

The legal basis for us using your personal information is to enable us to comply with our legal obligations as trustees of the Fund, which include paying benefits to you and other beneficiaries in connection with members' employment (or previous employment) with an employer participating in the Fund. We also have a legitimate interest in using your personal information to administer the Fund, provide you with access to services that may help you understand your benefits and to help us and the employers participating in the Fund review and manage financial matters relating to the Fund, together with our respective advisers.

If we are not provided with the personal information about you that we need, we may be unable to provide some or all of the benefits otherwise payable in respect of you from the Fund.

#### 4. Where does your personal information come from?

Most of the personal information that we hold is provided by members when joining the Fund or when contacting the Trustees about the benefits.

Other information about you may be provided by current and former employers of Fund members, other pension schemes and pension providers, independent financial advisers, medical practitioners, other advisers or service providers with whom the Trustees communicate in relation to the administration of the Fund and Her Majesty's Revenue and Customs (HMRC).

#### 5. Sharing your personal information with other parties

When the Trustees consider it necessary for the purposes explained in Section 3, your personal information may be shared with selected third parties, such as the Trustees' actuarial and financial advisers and other professional services providers, including those who provide legal, data processing, administration and communication services to the Fund.

The Trustees may also share personal information with regulatory authorities and healthcare practitioners, insurers, employers participating in the Fund, HMRC, the Pensions Regulator, other pension schemes, independent financial advisers, third parties that may provide you with financial education webinars and individual

sessions and any other third parties with whom we are authorised or required by law to share personal information, or whom you have otherwise authorised us to disclose your personal information. Please know that in certain circumstances these third parties will be the "controller" of that information, so please do familiarise yourself with their privacy policies.

Some of the third parties with whom your personal information is shared may be located outside of the UK (for example, this may happen if computer servers used by our providers are located or backed up in a country outside the UK). We will take appropriate steps to ensure that your personal information continues to be treated securely and in accordance with this statement when it is processed in, or otherwise accessed from, a location outside of the UK.

Under data protection legislation, we can allow your personal information to be transferred outside the UK if:

- the recipient is situated in a country that has been confirmed by the UK Government to provide adequate protection to personal information;
- the recipient has agreed (by way of a written contract or some other form of data transfer mechanism, in each case, approved by the UK Government) to provide all protections to your personal information as are required by data protection legislation; or
- we have your explicit consent to do so.

Further information about transfers of personal data outside the UK can be obtained by contacting us at the address set out below in Section 10.

Your personal information may also be provided to potential or actual acquirers of any Unilever Group company or business, as well as to other members of the Unilever Group of companies, subject to appropriate measures having been put in place with regards to ensuring that such information remains confidential and is handled in accordance with this statement.

#### 6. How long do the Trustees keep your personal information for?

We will keep your personal information in accordance with our data retention policy as it applies from time to time. We will need to keep personal information for as long as is reasonably necessary to determine members' entitlement to benefits from the Fund and to comply with our legal obligations in relation to the administration of the Fund.

#### 7. Accessing and updating your personal information

Data protection legislation gives individuals certain rights in relation to personal information held about them. These include:

- individuals can ask what personal information is held about them and be provided with a copy;
- if personal information held about an individual is incorrect, they can ask for it to be corrected;

- individuals can ask for personal information held about them to be deleted or for processing of that personal information to cease in certain circumstances, for example, where that information is no longer needed;
- individuals can request that certain types of personal information held about them is sent to them, or another organisation, in a format that can be read by computer; and
- individuals can withdraw their consent to how their personal information is being processed, where that processing is based on their consent.

Exercising these rights is subject to certain restrictions under data protection legislation. For further information about these rights, please contact us using the details set out in Section 10.

# 8. Complaints

If you are unhappy at any stage with how the Trustees are using your personal information, you have the right to lodge a complaint with The Information Commissioner's Office (www.ico.org.uk).

## 9. Changes to our privacy statement

This statement is subject to regular review and may be updated from time to time. We will tell you if we make any changes to how your personal information is used.

#### 10. Contact us

If you have any questions about how your personal information is used, please feel free to contact us at the following address: Service Delivery Manager (SDM), Unilever UK Pensions, Unilever House, Springfield Drive, Leatherhead, KT22 7GR, or at the following email address: expertadminteam@unilever.com.