

# Privacy Notice

The Trustees of the Sumitomo Mitsui Banking Corporation Europe Limited Pension Scheme (the Scheme) treat the privacy of its members (both active, deferred and pensioner members) and their spouses, partners, dependents and/or any other beneficiaries in connection with and for the purpose of administering the Scheme's data very seriously and we take appropriate security measures to safeguard the privacy of their data. The Trustees recognise and comply with the rights of you, a data subject, as set out in the General Data Protection Regulations (GDPR). This Privacy Notice explains how we, as a data controller (meaning that we are responsible for deciding how we collect, hold, use and protect your personal information), protect and manage the personal data\* you share with us and the information that we retain, including how we collect, process and share (where appropriate) that data.

\*Personal data means any information related to a natural person that can be used to directly or indirectly identify the person, for example; a first and last name, a home or other physical address, an email address or other contact information, bank details or medical information. In addition to factual information, it can also include any expression of opinion about an individual and any indication of the intentions of the Trustees or any other person in respect of an individual. References to a "data subject" are to the individual whose data is being used.

## How and why we obtain your personal data

The Trustees need to collect and process some of your personal information so that we can carry out our legal and regulatory obligations.

### Information provided by you

The sort of information you provide to us includes, but is not limited to:

- a) Personal details such as your name, address and contact details, including email address and telephone number (fixed line and mobile), your date of birth, and gender
- b) Employment details such as employee number, dates of employment, full or part time employment status, job band and responsibilities, salary, compensation, employee claims, bonuses and benefits, recruitment and termination details
- c) Financial Information; income, bank account details, insurance information, details of assets, savings, investments, benefits and National Insurance Number
- d) HMRC and tax details
- e) Information relating to health, lifestyle, education and social circumstances (for example details about current relationship status and marital/relationship history)
- f) Details of your family, dependants and beneficiaries and any other information that is required to administer your pension and other benefits
- g) Biometric data obtained from carrying out biometric checks on photographs and copies of identity documentation provided by you for vetting purposes
- h) For each of your visits to our website or online portal we may automatically collect technical information for example Cookies
- i) If you call our contact centre, we may record any phone number used as well as any phone calls for training and monitoring purposes

### **Information we get from other sources**

Much of the information we hold will have been provided by you, but some may come from third parties.

The other sources we get information from include, but are not limited to:

- a) Sumitomo Mitsui Banking Corporation or your current, previous or prospective employer (if not Sumitomo Mitsui Banking Corporation)
- b) Anyone entitled to benefit under your membership of the Scheme
- c) Other sources such as your next of kin (if you are medically unable to provide information to us directly)
- d) Registered medical practitioners
- e) Tracing agencies

We only obtain information from third parties if, to the extent we are aware, this is permitted by law. This information, as relevant to us, will only be obtained from reputable third party companies that we believe operate in accordance with the GDPR.

It is important that the personal information we hold about you is accurate and up-to-date. Please let us know if your personal information changes.

## **How and why we use your personal data**

We will use the information we hold to administer the Scheme and in relation to your membership of it, including:

- For the administration and effective management of the Scheme (as a whole and your membership of it), by us and any third party to whom we have delegated obligations
- To carry out obligations arising from agreements between you and us or concerning you, and to provide you with the information and services that you request from us
- To communicate with you by mail, phone, email, text (SMS) message or other electronic means (including to notify you about any changes to our services)
- To manage our relationship with you and to update, consolidate and improve the accuracy of our records
- For analysis purposes by us and, to the extent necessary, any other organisation involved in the administration of the Scheme and your benefits (such as Sumitomo Mitsui Banking Corporation, its group companies or any other Scheme employer and the Scheme's external advisors, including legal and actuarial advisers, and our insurers)
- To prevent and detect crime, carry out regulatory checks and meet regulatory requirements and guidance, legal obligations, professional rules or any other applicable voluntary codes
- To develop and improve our services to scheme members and beneficiaries and protect our interests, and to inform you of our services and any changes to those services
- To comply with our auditing, internal record-keeping and/or reporting, and any legal and regulatory requirements
- Risk management, e.g. ID verification on phone calls or in correspondence or by carrying out biometric checks on photographs and identity documents provided

- To comply with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and any subpoena or court process, or in connection with any litigation

We use your personal information in the ways described above for one or more of the following reasons:

- we need to comply with a legal obligation to which we are subject and/or
- it is necessary in our legitimate interests (or those of a third party) to do so, and your interests and fundamental rights do not override those interests. For example, our legitimate interests may include:
  - providing any clarification or assistance in response to your communications
  - improving our service to you as a Scheme member or beneficiary
  - ensuring that you are aware of your benefits and entitlements
  - complying with our record-keeping duties
  - ensuring that we pay the correct benefits at the correct time
  - managing the risks to the Scheme so that we can help to make your benefits safe
  - complying with all laws, guidance and codes that apply to the Trustees and/or the Scheme, as well as with data requests from regulators, governments, courts and law enforcement authorities
  - minimising disruption to the Scheme, and
  - monitoring the way in which our website is used, to help us improve your experience on the website.

The Trustees have a legal obligation and a statutory duty to provide individuals with certain information under a number of regulations. Under these regulations, the Scheme has a legal requirement to provide certain individuals with the following;

- Basic information on joining the Scheme or upon request by other parties
- Information to early leavers and those retiring from the Scheme
- Information on request relating to transfers to and from the Scheme
- Annual Benefit Statements to Active, Deferred, Deferred Pensioner and Pension Credit members of the Scheme no later than 31 August each year
- Information regarding changes to the Scheme that may affect the calculation of a member's benefits.

Some data, for example data in relation to your health or personal life, is regarded as “special category data”, and may require specific consent to be processed. Therefore, there may be specific situations in which we would require your explicit consent to process your special category data, for example in an application for ill-health retirement we may require your consent to use the relevant data when assessing your application.

## Retention of your personal data

We keep information in line with our Retention Policy which can be found on the members website. These retention periods are in line with the length of time we need to keep your personal information in order to run the Scheme and manage our relationship with you effectively. They

also take into account our need to meet any legal, statutory and regulatory obligations. These reasons might vary from one piece of information to the next. In all cases our need to use your personal information will be reassessed on a regular basis and information which is no longer required will be disposed of.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

## Who may we give your information to?

We may disclose your personal information (and that of your spouse, partner and/or any dependants) to:

- The Scheme administrator and other service providers. We have appointed JLT to administer the Scheme to act on our behalf as the Scheme administrator. The Scheme administrator will process your personal information on our behalf as a data processor
- Our auditor will process personal information on our behalf as our data processor; however when processing personal data in accordance with its statutory or professional obligations, our auditor will also be acting as a joint data controller.
- Claimants, beneficiaries, assignees and payees
- Pension schemes with which the person whose personal information we are processing has an association
- Professional advisers e.g. the Scheme's actuary, auditor and lawyers
- Financial organisations, for example counterparties to the Scheme's investments and its financial advisers
- Central and local government
- Ombudsmen, regulatory and law enforcement authorities, courts, tribunals, arbitrators or other judicial committees
- Family, associates or representatives of the person whose personal data we are processing
- Sumitomo Mitsubishi Banking Corporation, its group companies and any other Scheme employer
- Tracing agencies
- Any professional financial adviser(s) that you have appointed in respect of your financial arrangements (including your pension)
- insurers and reinsurers

Any data held by us will be treated as confidential. We will not sell your information to any third parties.

## What are your rights in relation to personal data?

You have certain rights in relation to your personal data. Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights you should submit a request in writing or email the Scheme Administrator and provide sufficient information to allow us to understand the scope of the request.

- Access: you have the right to obtain information regarding the processing of your personal data and access to particular personal data we hold about you
- Correction: you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected or completed
- Erasure: you have the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it. We only hold personal data where we are bound by regulations or other laws or internal requirements to retain this personal data. Data is retained in line with the data retention policy
- Restriction: You are entitled to ask us to restrict the processing of your personal data, for example if you want us to establish its accuracy
- Objection: where we are processing personal data based on legitimate interests (or those of a third party) you may challenge this. However we may be entitled to continue processing personal data based on our compelling legitimate interests or where this is relevant to legal claims
- Automated decisions: you are entitled to contest any automated decisions made about you where this has a legal or similar effect on you.
- Data Portability: This right enables you to obtain copies of the information we hold about you in a format that is easily transferred to either yourself or another organisation
- Complaint: you are entitled to complain to your local data protection authority, or to a court of law, if your data protection rights are violated. You may be entitled to claim compensation as a result of unlawful processing of your personal information

We may not be able to perform actions necessary to achieve the purposes set out in this document and you may not be able to make use of the services offered by us or to receive pension benefits if you do not provide us with personal information that we may need to comply with our statutory or contractual obligations or, if you refuse, or subsequently withdraw, your consent to your special category data being processed, transferred or disclosed in accordance with the above.

## Important Information

If you would like to invoke any of the above rights with us, have any questions or queries which are not answered by this Privacy Notice, or have any potential concerns about how we may use the personal data we hold please contact the Scheme Administrator.

You can find out more information about your rights by contacting the Information Commissioner's Office, or by searching their website at <https://ico.org.uk/>.

### Privacy Notice changes

This Privacy Notice is regularly reviewed. This is to make sure that we continue to meet the highest standards and to protect your privacy. We reserve the right, at all times, to update, modify or amend this Notice. We suggest that you review this Privacy Notice from time to time to ensure you are aware of any changes we may have made, however, we will not significantly

change how we use information you have already given to us without notifying you. The latest version of this policy can be found on the members website.