

Siemens Benefits Scheme – Full Privacy Notice

Your privacy is important to us.

This statement explains how we collect, use, share and store your personal data.

Siemens Benefits Scheme Limited (the “**Trustee**”) is the trustee of the Siemens Benefits Scheme (the “**Scheme**”).

As the Trustee of the Scheme, we hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

Given the nature of pension schemes and the broad range of organisations who assist the Trustee in running the Scheme, your personal data will also be shared with other parties. The Trustee has identified that it shares personal data with the following:

- With the **Scheme’s actuary**, for Scheme valuation purposes and when checking individual calculations.
- With the independent **trustee company** which is appointed as a Trustee of the Scheme and which may also need to hold records for its own compliance purposes.
- With the **Scheme’s sponsoring employers** and the Siemens group of companies, who may need personal data to assist with corporate activity or other employer initiated projects. Siemens may also require data to comply with its own legal obligations as the sponsoring employer.
- With the **Scheme’s auditors**, who undertake an annual audit of the Scheme and, for example, may check individual member calculations.
- With the Scheme’s legal advisors, who the Trustee may ask to advise on member disputes and benefit cases.
- With the Scheme’s investment advisors, who may use personal data to help make investment recommendations to the Trustee.
- With the Scheme secretary, who prepares documents and reports for all Trustee meetings and may be involved with member disputes and benefit cases.
- With the Scheme administrators, who are involved in the day-to-day running of the Scheme and hold all data for the purposes of calculating and paying benefits (this may include Pension Services, which is made up of Siemens employees, and the third-party administrator who assists with the Investor Plan).
- With medical advisors, when the Trustee needs to determine whether an ill health early retirement should be awarded (please note that health information is classified as a “special category of personal data” and can only be processed with your explicit consent).

- With statutory bodies, including HMRC, the Pensions Regulator and the Pensions Ombudsman.
- Other organisations who, from time to time, assist us to run the Scheme, these may include: the communications advisers and printers who help us prepare the various communications we send to you; AVC providers; annuity providers and the provider of the Trustee's bank account.

In some instances, the Trustee will share your personal data with organisations who are data controllers in their own right or joint data controllers. This is likely to be the case where they are not simply acting on the instructions of and fulfilling the purposes of the Trustee, but are using the personal data for their own ends and in a way that is not aligned with Trustee purposes. The Trustee understands that the Scheme actuary, the Scheme's sponsoring employers, the auditor and the independent trustee (all shown in bold in the above list) may, at times, be data controllers or joint data controllers and, where applicable, a link to their privacy notice can be found at the end of this document.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your contact details (including your postal address, email address and telephone number)
- your national insurance number
- your gender
- your marital status
- copies of your identification documents
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries
- medical and other details about your health
- your earning history
- payment history
- employment status (start and end dates)
- preferences

At times, we may also need to hold other personal data about you.

How we gather personal information

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Scheme and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Scheme's governing documents, as well as under relevant legislation. We will not intentionally collect any personal data from you that we do not need. Personal data relating to the Scheme is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as a "special category of personal data"). Under the legislation, details relating to health, sexual orientation and sexual life are regarded as "special categories of personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. The Trustee may, at times, need to process this type of data, for example, when processing an application for an ill-health pension or when considering any information relating to your relationship status on an expression of wish form.

What else we might do with personal data

The Trustee is aware that some of its service providers currently have support functions based outside of the European Economic Area (the "EEA"). These service providers have assured the Trustee that any processing of Scheme personal data outside of the EEA will comply with the requirements of data protection legislation. In particular, such transfers will generally be based on the EU Commission's model changes, copies of which can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life, and a period following your death.

However, we review the personal data held in relation to the Scheme on a regular basis in accordance with our data retention policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

Your rights

You have the following rights in relation to the personal data held by the Trustee:

Right of access – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.

Right to rectification – if at any point you believe that the personal data we hold about you is wrong, you can ask to have it corrected.

Right to restrict processing – you can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.

Right to object to processing – you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances, as we are relying on legitimate interests as a reason for processing.

Withdrawing consent – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.

Right to be forgotten – due to having a legitimate reason for holding your personal data the Trustee are unable to delete your personal data altogether. However, upon request there may be a possibility to reduce your personal data held, in certain circumstances. Although all personal data held by the Trustee will be automatically reviewed and deleted in line with the retention policy.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Scheme, and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of this notice
- make a complaint about how we have handled your personal data

Please contact the AskHR helpdesk using the details shown below unless you are an active member then please refer to HR Direct.

PO Box 9011, Poole, BH12 9HW
0845 603 9972 (select option 1)
askhr.uk@siemens.com
www.siemens.co.uk/mypension

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: 029 2067 8400.

Information Commissioner’s Office
Churchill House
17 Churchill Way
Cardiff
CF10 2HH

Updates to this notice

This notice is the latest version as at April 2018. This notice will be updated from time to time and you can see the current version at any time on the Scheme website. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).

Links to the privacy notices of other data controllers/joint data controllers

Aon Hewitt Ltd: <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>

Capita Cranfield: <http://capitalcranfield.com/wp-content/uploads/2018/04/PRIVACY-NOTICE.pdf>

If you have any further queries regarding the details in this privacy notice, please contact AskHR, where one of our service representatives will be happy to help you.