

Privacy Notice

Who we are

Allen & Overy Pension Trustee Limited (the “**Trustee**”) is the current trustee of the Allen & Overy Pension 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. This is because we hold information from which you can be identified. The 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.

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, date of birth, national insurance number and gender;
- your address and other personal contact details (such as telephone number and email address);
- your financial details, needed to pay benefits to you;
- family details, which may identify potential beneficiaries and dependants to allow us to consider your wishes for the payment of any benefits in the event of your death (such information may include your relationship status);
- relevant employment information (including past salary information and employment dates);
- details about your pension benefits; and
- medical and other details about your health.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

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.

Your personal data will generally be collected directly from you or from your current or former 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, we may have been given your personal data by the member or through enquiries undertaken by us on a member’s death.

The main purposes for which we use your personal data include, but are not limited to, the following:

- to set up, administer and manage your benefits;
- to provide information to you, or a representative authorised by you, in response to queries, changes to your benefits, or changes in legislation that we must tell you about;
- to undertake identity checks, to ensure that your benefits are protected against fraud and that you are still alive; and
- for compliance with regulatory and legal obligations, such as submitting statutory tax reports to HM Revenue & Customs.

Personal data relating to the Scheme is held on paper, on microfiche 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 “**special categories 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 considering any information relating to your relationship status on an expression of wish form.

Will personal data be transferred outside of the EEA?

Certain organisations with which the Trustee shares Scheme personal data may from time to time process data outside of the European Economic Area (the “**EEA**”). Where this happens, these organisations will need to assure the Trustee that any transfer of Scheme personal data outside of the EEA will comply with the requirements of data protection legislation. In particular, such transfers will generally be made based on the model clauses approved by the European Commission, to ensure that third parties commit to ensuring an adequate level of protection for your personal data.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

As the Trustee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

- your current or past employer;
- the Scheme’s professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser and lawyers;
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee;
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator);
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefits statement;
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions;
- the providers of the Trustee’s banking and payment facilities, in order to effect pension payroll and any other payments to beneficiaries;
- third parties who provide member verification services; and
- beneficiary or mortality tracing agencies.

In some instances, the Trustee will share your personal data with organisations who are:

- Data controllers in their own right - this is likely to be the case where those organisations are not simply acting on the instructions of and fulfilling the purposes of the Trustee, but are determining the purposes and means of processing personal data themselves. The following organisation has identified itself in this way:
 - Aon Hewitt Limited, the current Scheme actuary. Aon Hewitt’s privacy notice will be accessible through the following link: <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>

How long we keep personal data for

The Trustee will keep personal data for as long as is required to meet the purposes for which it was collected. In practice, this will be the lifetime of the Scheme and for an appropriate period after that time. This is because of the long-term nature of pension schemes and the possibility of queries being brought many years after an individual has ceased to be a member or a scheme has been wound up.

From time to time, the Trustee will consider whether certain types of personal data are no longer needed. If they aren't, they will generally be destroyed, erased or made inaccessible.

Security

We strive to use appropriate technical and physical security measures to protect your personal data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration and unauthorised disclosure. Service providers with access to your personal data are also selected carefully, must undergo due diligence including a privacy risk assessment, and are contractually required to use appropriate protective measures.

Your rights

- **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 inaccurate, 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** – where we rely on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances. Where we rely on other legal grounds for processing, the right to object does not apply.
- **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 about your personal data” 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** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the relevant 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 the notice; or
- make a complaint about how we have handled your personal data,

please contact the Scheme administrator:

In writing: Capita, Radio House, Thanet Way, Whitstable, Kent, CT5 3QP.

Phoning: 01227 774654 or Emailing: allenoverly@capita.co.uk.

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 have the right to lodge a complaint with the Information Commissioner's Office whose helpline number is **0303 123 1113**.

Updates to this notice

This notice is the latest version as at 25 May 2018. This notice will be updated from time to time and will be available at www.myalleneverypension.com

Should you not have access to the internet, please contact the Scheme Administrator on 01227 774654 (see "Who to contact about your personal data" above).