

Privacy Notice

J.P. Morgan UK Pension Plan

J.P. Morgan Chase Pension Plan Trustee Limited is the Trustee of the J.P. Morgan UK Pension Plan (the “**Trustee**”, “**we**”, “**our**” or “**us**”). The Trustee is committed to protecting the information of their Data Subjects, which includes active, deferred, and/or former members, and potential or actual beneficiaries (collectively the “**Data Subjects**” or “**you**”), and acting in accordance with your rights under data protection law.

Who we are

For the purposes of data privacy laws, the responsible party is J.P. Morgan Chase Pension Plan Trustee Limited, 25 Bank Street, Canary Wharf, London, E14 5JP. Please note that in relation to certain rights that data protection laws confer on individuals, the administrator of the Plan, WTW, may be the most appropriate point of contact for any queries – please see below for further information.

Information covered by this Privacy Notice

This Privacy Notice covers all personal information collected and used about you by the Trustee in the context of the Plan.

“Personal data” or “personal information” means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This includes the types of information set out on the right.

Collection of your information

We collect and process the following information about you:

- ▶ your personal details such as your name, gender, date of birth, home address (including postcode), tax residency, national insurance number, telephone number, email address, bank account details (in certain cases), payroll number, relationship status, dependants and country of residence, nationality;
- ▶ information relating to your benefits, including your member identifying number (which is assigned to you by the Plan), the date you joined and left the Plan, company service dates, your earnings, the category and value of contributions and benefits that you have built up or receive, your target retirement age, and any relevant matters impacting your benefits such as voluntary contributions, investment selection, pension sharing orders (including information in divorce or dissolution certificates), tax protections or other adjustments;
- ▶ records of communications with you (including any complaints) and your mailing preferences; and
- ▶ in certain cases, special categories of personal data such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin (for example, when you submit a nomination of beneficiary form).

In certain cases, we collect this information directly from JP Morgan Chase Bank N.A. (“**JPM**”) or from third parties providing certain services to the Plan, such as address tracing and mortality screening services.

How we use your information

We use your information for the following purposes:

What is the legal basis for us processing your information in this way?

Administering the Plan

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject and discharging our and your employer's (or former employer's) obligations to you arising from the employment relationship and the terms of the Plan.

It is necessary for our legitimate interests to process your personal data for the purposes of administering the Plan on a day-to-day basis (e.g. recording and paying benefits; reviews conducted by us or by our administrators for statistical and reference purposes; monitoring engagement and activity; overseeing suppliers), such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Communicating with you in relation to your benefits and contributions including circulating member-targeted communications

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject and discharging our and your employer's (or former employer's) obligations to you arising from the employment relationship and the terms of the Plan.

It is necessary for our legitimate interests to process personal data for the purposes of providing you with tailored, targeted information in relation to your benefits and contributions, such interests in each case not being overridden by your interests or fundamental rights and freedoms.

It is also necessary for our legitimate interests to provide information to insurance brokers, to allow such brokers to provide you with quotes and to contact you with information regarding the same as part of the retirement process.

Handling requests for transfers (e.g. transfers of your benefits to other pension schemes or into the Plan), and requests in relation to your retirement benefits.

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject and discharging our and your employer's (or former employer's) obligations to you arising from the employment relationship and the terms of the Plan.

It is necessary for our legitimate interests to process personal data for the purposes of handling requests for transfers, such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Processing your nomination forms and allocation of death benefits

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject and discharging our and your employer's (or former employer's) obligations to you arising from the employment relationship and the terms of the Plan.

It is necessary in our legitimate interest to process personal information to allocate death benefits correctly and to act in accordance with a member's wishes. This includes sharing personal information where necessary with the J.P. Morgan (UK) Excepted Life Policy Trust 2023 (and any other pension or life assurance trusts operated by the Company) for the purposes of administering that trust and taking into account a member's wishes when distributing benefits.

Dealing with your enquiries and complaints

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject, including in relation to certain complaints.

It is necessary for our legitimate interests to process your personal data to provide you with a tailored answer to your enquiries and complaints, such interest not being overridden by your interests or fundamental rights and freedoms.

We use your information for the following purposes:

What is the legal basis for us processing your information in this way?

Making disclosures at your request

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject.

It is necessary for our legitimate interests to process your personal data for the purposes of carrying out your instructions in relation to your benefits (e.g. making disclosures in relation to your benefit entitlements and options), such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Making disclosures to the JP Morgan Group

It is necessary for the Trustee's and JP Morgan Group's legitimate interests to process your personal data for the purpose of audit or corporate transaction purposes, scheme mergers or bulk transfers, such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Beneficiary tracing

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject and discharging our and your employer's (or former employer's) obligations to you arising from the employment relationship and the terms of the Plan.

It is necessary for our legitimate interests to process personal data for the purposes of beneficiary tracing if we should happen to lose contact with you (e.g. to ensure you receive the correct benefits and reduce the risk of impersonation fraud), such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Assisting with the investigation or prevention of crime and fraud prevention and making disclosures to law enforcement authorities or other official or regulatory bodies

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject.

Developing policies, improving our processes and our use of technology and introducing new processes

It is necessary for discharging our and your employer's (or former employer's) obligations to you regarding timely benefit payments and processes, and for our legitimate interests to process your personal data for the purposes of making the Plan administration more efficient, (e.g. for testing and upgrading systems, implementing new administration processes and upgrading existing ones), such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Complying with legal and regulatory obligations including in relation to The Pensions Regulator

This type of processing is necessary for the purposes of complying with legal requirements to which we are subject.

Transferring data between intra-group pension plans of which you are a member

It is necessary for our legitimate interests to transfer and for other intra-group Trustees of such pension plans to receive your personal data to help facilitate proper administration of the plan(s), such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Running competitions for you to enter into from time to time

It is necessary for our legitimate interests to run internal competitions in order to encourage you to keep your details up to date and engage with the Plan, such interests in each case not being overridden by your interests or fundamental rights and freedoms.

Where the Plan rules require you to provide information which we cannot otherwise process without your consent (such as health data in ill-health/incapacity cases)

We will ask for your consent before processing your information in this way. You can withdraw your consent at any time.

Where the personal information we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect or continue to use this personal data we may be unable to administer your contributions and benefits or record or pay your or your beneficiaries' benefits.

Disclosures of your information

We typically share your information with the following recipients:

- the providers of services to us for the purpose of serving the Plan and the JP Morgan Group, such as:
 - administrators,
 - auditors,
 - financial advisors (at your request, to provide you with financial advice),
 - legal advisors,
 - payroll providers (to record and pay benefits),
 - printing, communication, IT and hosting, election service providers (for Member Nominated Directors), AVC policy providers (if you hold one or more of the legacy AVC policy investments), pension / investment / actuarial consultants (to assist with technical queries relating to your benefits or investments), and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
 - insurance brokers, (to allow brokers to provide you with quotes and to contact you directly with information regarding the same as part of the retirement process or to arrange settlement of death benefits);
- members of the JP Morgan Group for other relevant purposes, such as for audit purposes, in relation to corporate transactions initiated by the JP Morgan Group, and, where applicable, to allow you to flexibly access your benefits including exercising your pensions options;
- any new pension provider you select, if requested to do so by you;
- insurance and reinsurance companies;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so;
- the J.P. Morgan (UK) Excepted Life Policy Trust 2023 (“**Excepted Group Life Trust**”) for the purposes of administering the Excepted Group Life Trust and taking into account a member’s wishes when distributing benefits. Please note the Trustee is also the trustee of the Excepted Group Life Trust;
- any other pension or life assurance trusts operated by the Company for the purposes of administering that trust and taking into account a member’s wishes when distributing benefits; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information may involve transferring your information outside of the UK or the European Economic Area. In particular:

- If you have service with JP Morgan Group Companies in locations outside of the UK or EEA, we may transfer your information within the JP Morgan Group to those locations in order to check your service record and thereby confirm your benefits.
- Certain administrative tasks processed by the Plan’s administrator, WTW, are processed by WTW affiliate companies in India and the Philippines.
- The Plan’s Auditor, PricewaterhouseCoopers (PwC) has confirmed that certain elements of PwC’s infrastructure systems reside outside of the UK or EEA.
- The Trustee may hold, via Mercer Limited’s Connect application, trustee documents on servers in the United States of America.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom (or equivalent measures) entered into with the party outside the UK or the European Economic Area. Further details of these transfers including copies of any data transfer agreements we use are available from us on request.

Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the periods envisaged within our records retention policy and schedule. We determine the period envisaged within such documentation with regard to the Plan’s operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, and responding to legal claims or regulatory requests.

Your rights

If you are in the United Kingdom or European Economic Area, you have the right to:

- ▶ **Access.** You have the right to request a copy of the personal information we are processing about you, which we will provide to you. For your own privacy and security, in our discretion we may require you to prove your identity before providing the requested information. If you require multiple copies of your personal data, we may charge a reasonable administration fee.
- ▶ **Rectification.** You have the right to have incomplete or inaccurate personal information that we process about you rectified.
- ▶ **Deletion.** You have the right to request that we delete personal information that we process about you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- ▶ **Restriction.** You have the right to restrict our processing of your personal information where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- ▶ **Portability.** You have the right to obtain personal information we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where **(a)** this is personal information which you have provided to us, and **(b)** if we are processing that data on the basis of your consent or to perform a contract with you (such as to administer your account).
- ▶ **Objection.** Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.
- ▶ **Withdrawing Consent.** If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge.

You can exercise any of these rights by contacting us using the details below.

In addition, you can lodge a complaint about our processing of your personal information with a supervisory authority in the Member State where you habitually reside or work, or where a breach has taken place. Details for the office of the Information Commissioner in the UK are available at www.ico.org.uk.

Further information required to carry out requests

In certain cases, it will be necessary to obtain additional information from you, such as in order to carry out investigations into fraudulent activity or process your requests for a transfer or allocation of benefits, to retire early on grounds of ill-health, or receive certain lump sums, or to seek your wishes for payment of discretionary death benefits. We will notify you when your information is required for this purpose.

STATUS OF THIS PRIVACY NOTICE

This privacy notice was updated in March 2023. This document is a notice to you and not a contract between us. We reserve the right to amend it from time to time. Any future changes or additions to the processing of personal data as described in this privacy notice which impact you will be communicated to you promptly through an appropriate channel depending on how we normally communicate with you, for example regular post, via email or by posting an alert on the home page of our website.

Contact Information

You can contact us about the matters set out above using the following details:

✉ **J.P. Morgan UK Pension Plan**
WTW
PO Box 545
Redhill
Surrey
RH1 1YX

☎ **01737 227589** (Monday to Friday, 9am to 5pm)

✉ **jpmukpension@willistowerswatson.com**