

LIFESIGHT PRIVACY NOTICE

Last Revised: November 2023

1. Who are we?

1.1. Lifesight Limited (the “Trustee”) is the Trustee of LifeSight (the “Scheme”). Towers Watson Limited (“WTW”) is founder of LifeSight and administers the Scheme on behalf of the Trustee.

1.2. Towers Watson Limited and the Trustee (“we”, “our” or “us”) are joint data controllers of the personal information we use to operate and provide your benefits under the Scheme.

2. Scope of this Privacy Notice

This Privacy Notice, together with the Website [Terms and Conditions](#) and Mobile application (“Mobile app”) [Terms and Conditions](#), explains how we collect, use and share personal information in the course of administering the Scheme whether you interact with us through our website only or our website and mobile application. This Privacy Notice applies to personal information collected through the Lifesight website at <https://epa.towerswatson.com/accounts/lifesight> (the “Website”), the LifeSight mobile application, provided by you through other means, such as in writing, by email or on the phone, or collected from other sources.

3. Cookies

We use cookies on our Website. You can find out more about the cookies we use and why by viewing our [Cookie Policy](#). Our Cookie Policy should be read together with this Privacy Notice.

4. Changes to our Privacy Notice

We review our Privacy Notice regularly. Where the Privacy Notice has been updated, it will be clearly identified by reference to the date of this Privacy Notice above.

5. What information do we collect about you?

5.1. Information you give to us

You may give us your personal information by filling in forms on our Website. This includes information you provide when you register to use our Website, subscribe to our services, fill out contact forms and/or and when you report a problem with our Website. In addition, on an ongoing basis you may also provide personal information to us in writing, by email or via our helpdesk service.

The information which you give us may include: your name and contact details, national insurance number, information about your family (including your marital or partnership status and the names, ages and lifestyle information of your partner and children), lifestyle, health and social circumstances, employment and finances, as well as any other information that you may choose to provide to us.

Please keep us informed of any relevant changes to your personal information.

Some of the categories of information that we collect are special categories of personal information ("special category data"). In particular, we may process personal information that relates to your health (such as your medical history and reports on medical diagnoses, injuries, and treatment); information about your personal characteristics and circumstances of a sensitive nature such as your (and your family members') mental and physical health, disability, and genetic information; and criminal records, fines and other like judicial records.

5.2. Other information we receive

We may have been provided with personal information about you by your employer, financial adviser or from any other pension scheme of which you were a member. This would include names, contact details, demographic data (such as your age, gender, and job role), identifiers (such as your employee number or other ID that refers to you), financial data (such as your salary and bank account information), employment history and the type of benefits to which you are entitled.

We collect your IP address when you visit our Website. Matomo uses this, together with anonymous information about visitor behaviour patterns, to provide us with information about how our Website is used enabling us to make improvements for all users.

We may also collect personal information from various other third parties such as regulatory and tax authorities, other organisations with whom you have dealings, government agencies and publicly available records.

5.3. Mobile app users only

Where you interact with us via our Mobile app, we also collect:

- information related to your use of the Mobile app (e.g., device identification, login method, most frequently visited screens, member status, pension information), enabling us to verify you as a registered user and present your information to you in the most user-friendly way;
- device event information (e.g., crashes, number of sessions, geographic user volume), enabling us to ensure continuous availability and functionality and support our security monitoring of the Mobile app; and
- information regarding your interaction with the Mobile app, enabling us to make improvements for all users.

6. Legal bases for processing your personal information

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- to perform a contract with you;
- for our legitimate interests to provide you with information in accordance with Guidance from the Pensions Regulator;
- for our legitimate interests (including the legitimate interests of WTW and of the Trustee), for example to ensure that the Scheme is administered properly, to improve our products

and services, for our legitimate interests to prevent and detect fraud, to manage our risks, maintain accurate transaction records, to offer you access to information, products, services and details of benefits attaching to your LifeSight membership which we believe may be of interest to you (such as services including financial coaching provided as part of the Financial Wellbeing platform) and to manage our business in an efficient way. We ensure that these legitimate interests do not unfairly impact your privacy or your other rights by taking the following measures:

- We only process your personal information to the extent we need to in order to meet these legitimate interests. This means we use the minimum personal information that is reasonably necessary to fulfil the desired purpose; and
- we anonymise or pseudonymise personal information whenever we use it for analysis that is unconnected with your LifeSight Account.
- to comply with our legal, regulatory, and professional obligations, such as our duties to members and our due diligence and reporting obligations.

When we process special category data, we do so only:

- to establish, exercise or defend legal claims;
- where legislation permits us to process special category data; or
- with your consent, where consent is required by law. If we ask for your consent, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice (but doing so may mean that we are no longer able to maintain your membership and/or deliver certain benefits to you).

7. How we use your personal information

We use your personal information to:

- carry out our obligations in relation to any contracts entered into between you, your employer and us. In particular, we administer all aspects of your membership of the Scheme, carry out your instructions in relation to your LifeSight Account and provide you with information and services in relation to your LifeSight Account. Communications from LifeSight will be provided electronically as standard (unless the law requires otherwise) using the email address you, your employer, or former pension scheme provided to us;
- provide you with details about the benefits attaching as part of your LifeSight account membership;
- respond to your queries, complaints or requests;
- provide you with technical support;
- provide you with access to information and products which we believe may be of interest to you; and
- comply with legal obligations that apply to us.

8. Profiling and automated decision-making

The way we analyse personal information for the purposes of risk assessment, fraud prevention and detection, and to administer the Scheme may involve profiling, which means that we may process your personal information using software that is able to evaluate your personal aspects and predict risks or outcomes. We do not use profiling to restrict any of the services offered to

particular members based on such activities.

The Trustee and its advisors make use of anonymous and/or aggregated data analysis to assist in the design of the scheme, investments held and the assessment of value for members more broadly.

9. How we share your personal information

WTW and the Trustee share personal information with one another in order that we can perform our respective roles in administering the Scheme.

Because WTW operates as a global business, personal information may be shared with our group companies, which include our subsidiaries, our ultimate holding company and its subsidiaries, for administrative purposes and to assist us in providing services to you.

We will also share your personal information with our third-party service providers who we engage to process the information that we collect from you on the Website, and/or to maintain our Website, content, or services, on our behalf and in accordance with this Privacy Notice. These third parties may require personal information to trace members' missing addresses and confirm member deaths for example.

We will also provide your personal information to other third parties:

- where we are required or authorised by law to do so, including to law enforcement agencies for the purposes of fraud prevention;
- where relevant in connection with a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process; or
- in connection with commercial transactions, including in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). In such cases, your personal information may be shared with the acquiring or successor entity along with its affiliates and subsidiaries; or
- to LifeSight's auditors KPMG for the purposes of preparing audits in accordance with legislative requirements and for assurance purposes;
- so they may provide you with details about the benefits attaching as part of your LifeSight account membership.

10. Security and retention

We maintain appropriate technical and organisational security measures to protect the security of your data against loss, misuse, unauthorised access, disclosure, or alteration. These measures are aimed at ensuring the ongoing integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will retain your personal information for a period that enables us to administer the Scheme, defend or commence future legal claims and comply with mandatory record retention requirements. Where we have a reason to retain your personal information for longer, for example to resolve an outstanding claim, investigation or complaint, we will retain your personal information until the matter has been resolved or concluded.

11. Overseas transfers of personal information

Because we operate as a global business, we transfer and process personal information in countries outside the European Economic Area. Some of these countries are not regarded as ensuring an adequate level of protection for personal information under European Union law and we have put in place measures to maintain appropriate technical and organisational security to protect your data. These measures are controlled through contractual safeguards that are in place to ensure your information is adequately protected when it is processed in those countries. For more information on the safeguards in place, please contact us using the details provided in the "Contacts & Comments" section below.

12. Your rights

If you would like to access, review, correct, update, suppress, or restrict the processing of your personal information or request a copy of your personal information in machine readable format, please contact us using the contact details below.

In your request, please make clear what personal information you would like to access or have changed, whether you would like to have your personal information suppressed from our database or otherwise let us know what limitations you would like to put on the use of your personal information.

You have the right to make a complaint to the data protection supervisory authority where you are located, or to the UK Information Commissioner's Office, at www.ico.org.uk/concerns/.

13. Contacts & Comments

If you have any questions or comments regarding this privacy notice or if you would like to exercise your rights in relation to your personal information, please contact the LifeSight team at WTW, PO Box 758, Redhill, Surrey, RH1 9GT or at lifesightsupport@willistowerswatson.com.

Please note: we will only ask you to provide personal information to validate your identity should you raise a query. If you receive a message relating to your LifeSight Account that requests financial information or makes you suspicious, please contact the LifeSight team at the above address.