

DATA PRIVACY NOTICE FOR THE EXXONMOBIL PENSION PLAN

1. Introduction

This Data Privacy Notice describes the processing of personal data pertaining to members of the ExxonMobil Pension Plan (the "**Plan**") and their dependants.

ExxonMobil Pension Trust Limited as trustee of the Plan (the "**Trustee**") needs to collect and use personal data about the Plan's members and their dependants. The Trustee acts in a capacity as so-called "data controller" of your personal data in this regard.

The term personal data means, broadly, any information or a combination of pieces of information relating to you from which you could reasonably be identified. By "processed" or "processing" your personal data we mean carrying out any operation or set of operations, including collecting, using and storing it.

2. Purpose of this Data Privacy Notice

The purpose of this Notice is to inform you about:

- a) the personal data the Trustee collects about you;
- b) how the Trustee uses your personal data and its legal basis for processing it;
- c) who the Trustee shares your personal data with;
- d) international transfers of personal data;
- e) maintaining the accuracy of your personal data;
- f) security and confidentiality applied by the Trustee to the personal data;
- g) your rights in relation to your personal data;
- h) how long the Trustee will retain your personal data;
- i) contact details for data protection related questions and complaints.

3. Personal data collected by the Trustee

Information the Trustee may collect directly from you

The categories of personal data that we collect directly from you include:

- (a) personal details (for example, your name, date of birth, marital status);
- (b) your bank details and National Insurance number;
- (c) your contact details (for example, your address, phone number and email address);
- (d) details about who you would like us to consider paying benefits to if you die including, but not limited to, details about your spouse or civil partner;

- (e) if you have paid additional voluntary contributions, your choice of fund for investing your contributions.

Information the Trustee may collect from other sources (for example your employer or former employer)

These are examples of categories of personal data we may collect from other sources:

- (a) personal details (for example, your name, date of birth, marital status);
- (b) your contact details (for example, your address, phone number and email address);
- (c) information necessary to calculate and pay your contributions or benefits (for example, your employment history and your salary).

4. Purposes for data collection and the Trustee's legal basis for processing

How we use your personal data

The ways we use your personal data include:

- (a) identifying you and your dependants and making sure your details are up to date;
- (b) communicating with you about your benefits in the Plan;
- (c) ensuring the right amount of contributions have been paid to the Plan;
- (d) calculating and paying your benefits and any benefits payable to your dependants;
- (e) making trustee decisions – such as how to distribute benefits after your death;
- (f) calculating the actuarial liabilities of the Plan;
- (g) if you have paid additional voluntary contributions to the Plan, we may use your information to decide how to invest assets allocated to your account; and
- (h) dealing with any complaints or queries we receive from members or their dependants.

Our legal basis for using your personal data

The Trustee is committed to processing personal data in a lawful manner.

The Trustee will ensure that, when it processes personal data of members of the Plan and their dependants, the processing is allowed under applicable data protection law. This means amongst others that the Trustee shall assess whether and which justification (*legal basis*) it has for the processing of personal data, as stipulated under the UK General Data Protection Regulation and applicable law. Depending on the situation, the Trustee can justify the processing of personal data of members of the Plan and their dependants on various legal bases, which include:

- (a) to fulfill our legal obligations (which includes paying your benefits correctly and giving you specified information about your benefits as required by pension legislation);

- (b) to meet our legitimate interests to administer the Plan efficiently;
- (c) to meet the Plan's sponsoring employers' legitimate interests in managing and funding the liabilities of the Plan;
- (d) because using the information is necessary in relation to a legal claim.

In line with the expectations of the Information Commissioner's Office (ICO), we have followed a three-stage process in considering the Trustee's legitimate interest in processing your data, and we are satisfied that: (i) the Trustee has a legitimate interest in processing your data to administer the Plan; (ii) it is necessary for the Trustee to process your personal data to meet that legitimate interest; and (iii) your interests will not be prejudiced as a result.

If you have given us information about your health, we may ask for your consent to process this data. Where this applies, you may take back your consent at any time by contacting the Plan's administrator using the contact details listed below.

5. Disclosure of and access to personal data

“Disclosure” and “disclosing” personal data means giving access to, or sharing the personal data or certain elements of it with people or organisations other than the organisation that originally collected the personal data.

The Trustee may disclose your personal data to:

- (a) the Plan's administrator, payroll providers, and our advisers (for example the Plan actuary, our auditors, our medical advisers and our legal advisers) and their sub-contractors to facilitate the administration of the Plan and your benefits. Willis Towers Watson as the Plan's actuarial adviser is also a data controller in respect of your personal data. For further information on how Willis Towers Watson use your personal data please see: <https://www.willistowerswatson.com/en-gb/notices/How-Willis-Towers-Watson-uses-personal-data-for-actuarial-services-to-UK-pension-scheme-trustees>
- (b) other medical advisers where you have requested an ill health pension (we may ask for your consent to this);
- (c) Her Majesty's Revenue and Customs (HMRC) and other Government organisations, including, but not limited to, the Pensions Regulator, the Pensions Ombudsman and the Pension Protection Fund;
- (d) insurance companies or other occupational pension schemes and their advisers with a view to investing in or securing benefits through long term insurance policies or a merger of schemes;
- (e) insurance brokers in connection with any Trustee insurance;
- (f) the providers of funds in which members with additional voluntary contributions can choose to invest;
- (g) independent financial advisers to enable them to advise on your benefits in the Plan;
- (h) companies who specialise in helping pension schemes to communicate with members about their benefits.

The Trustee may also provide some of your personal data to the Plan's sponsoring employers or companies in the corporate group to help them make decisions relevant to the sponsoring employers' role in relation to the Plan. We will only do so to the extent we consider necessary for these purposes.

Before any personal data is provided to or accessed by any third party data processors processing personal data on behalf of the Trustee, we enter into a written agreement with the third party which requires the third party: (1) not to make any unauthorised further disclosures of the personal data; (2) to use the personal data only for the specified purposes, and only as directed by the Trustee; (3) to retain the personal data only as long as necessary to carry out these purposes or to protect company interests (e.g. until the end of statute of limitations periods); and (4) to have in place adequate and appropriate security measures.

If personal data is shared with a third party outside the UK, the conditions regarding data transfers (see Section 5 below) apply in addition to the requirements of this section.

The Trustee does not sell or lease the personal data of members or their dependants for commercial or marketing purposes.

5. International Data Transfers

Your personal data may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal data under UK law. Where your personal data is to be transferred to such a country, we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the data. For more information on any safeguards in place, please contact the Plan administrator using the contact details below.

6. Accuracy of personal data

The Trustee endeavors to keep personal data that it processes accurate, complete and current taking into account the purposes for which it was collected and is being used. We expect that Members and any dependants who are receiving a benefit from the Plan will assist us in maintaining the accuracy and completeness of their personal data, and we request that you notify us when your personal details change.

7. Security and Confidentiality

The Trustee has in place measures to protect the security of your personal data and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal data with our administrator or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal data only for the purposes we set out.

8. Your rights in respect of your personal data

You have rights regarding your personal data, including rights in certain circumstances to:

- access to your personal data held by the Trustee;
- have inaccurate or incomplete personal data rectified;
- have personal data deleted (but not if the Trustee still needs to process your data for a lawful purpose); and
- restrict or object to the Trustee's use of your personal data.

If you wish to exercise any of your rights, we may need extra information from you in order to consider your request. If you would like to discuss or exercise the aforementioned rights, please contact the Plan administrator using the contact details below.

8. Records Retention

We will keep your personal data for as long as we have a relationship with you or your dependants. When deciding how long to keep your personal data after our relationship with you and your dependants has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

9. Questions and Complaints

The Trustee is committed to protecting your personal data as described in this Data Privacy Notice and as required by data protection law. If you have questions regarding this Notice, would like to exercise any of your rights (as set out in section 8 above), or you have a complaint, please contact us via the Plan administrator, whose contact details are:

ExxonMobil Pension Plan Administration
WTW
Sunderland | SR43 4JU

E mail: exxonmobiluk@wtwco.com

If you believe that we have not resolved your concerns, you can also complain to the Information Commissioner's Office. Details are set out at www.ico.org.uk

We may update this Privacy Notice from time to time, and we have set out below when it was last updated. The most up to date version will be made available at <https://epa.towerswatson.com/accounts/exxonmobil/>

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