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## FULL PRIVACY NOTICE FOR MEMBERS OF THE RBC (UK) PENSION PLAN

### 1. Introduction

The Trustee of the RBC (UK) Pension Plan (the **Trustee**) is committed to protecting the privacy and security of the personal information (known as “personal data”) of members and beneficiaries of the Plan.

The Trustee is a data controller under the General Data Protection Regulation as it forms part of “retained EU law” as defined in the European Union (Withdrawal) Act 2018 (UK GDPR). This means that we are responsible for deciding how we collect, hold, use and protect your personal data and we are required to give you certain information about how and why we do this.

This privacy notice describes how we collect, hold, use and protect personal data that relates to you or any individual connected to you, both during and after the time when you are a member or beneficiary of the Plan. We may update this notice from time to time.

This notice explains the following:

- Section 2 – what personal data we may collect about you;
- Section 3 – how we collect personal data about you;
- Section 4 – what we may use your personal data for;
- Section 5 – how we keep your personal data safe including when we transfer it across borders;
- Section 6 – sharing your personal data;
- Section 7 – how long we retain your personal data;
- Section 8 – your rights regarding the personal data you provide to us;
- Section 9 – what happens if you do not provide us with your personal data;
- Section 10 – changes to our data protection arrangements; and
- Section 11 – how to contact us.

### 2. Personal data we may collect about you

Personal data means, broadly, information that identifies (or that could, with other information that we hold or are likely to hold, identify) a living individual. This could include any information provided to us in relation to your or another’s actual, past or potential membership of the Plan.

We may hold any or all of the following personal data about you:

- personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number, and identifiers such as National Insurance number and your employee number;
- family, lifestyle and social circumstances such as details about current relationship status and marital/relationship history, details of family and dependants, next of kin and emergency contact information;
- documentary data such as details from certain documents or copies of them as proof of identity, residency, employment and key dates, which could include a passport, driving licence, birth certificate and marriage certificate;
- employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, job title and job responsibilities; and

- financial details such as income, salary, assets and investments, bank account details to process pension payments, tax code, benefits, grants and insurance details.

We may also hold other information about you which is known as ‘special category’ data and requires a higher level of protection – for example, information relating to your physical or mental health. Where the Trustee collects such data, we are required to meet additional legal requirements in relation to our processing activities.

### **3. How do we collect personal data about you?**

We collect your personal data when you, your employer, a member of the Plan or another person contact us online, by phone, text, email, or post. We also obtain your personal data where this is provided through any other engagement or correspondence that you, your employer, a member of the Plan or another person may have with us. We may also collect personal data about you from other third parties including tracing agencies and from public sources when we believe it is appropriate for us to do so.

It is important that the personal data we hold about you is accurate and up-to-date. Please let us know if your personal data changes.

### **4. What we may use your personal data for**

The Trustee may use your personal data for the following purposes:

- to administer the Plan including to process data to calculate and pay benefits;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services;
- in relation to any correspondence related to the administration of the Plan (including queries relating to membership of the Plan, communications with nominated or appointed Trustee directors and communications when we are unable to contact members of the Plan);
- to notify you about our services and changes to our services;
- for statistical, financial modelling and reference purposes;
- for internal record keeping;
- risk management e.g. ID verification on phone calls;
- complying with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of the sponsoring employers’ group involving the Plan;
- to process Trustee director nominations; and
- in connection with the purchase of Plan investments such as ‘buy-in’ agreements with insurance companies.

We use your personal data in the ways described above for one or more of the following reasons:

- (a) we need to comply with a legal obligation to which we are subject; and/or

- (b) it is necessary in our legitimate interests (or those of a third party) to do so, and your interests and fundamental rights do not override those interests. For example, our legitimate interests may include:
- providing any clarification or assistance in response to your communications;
  - improving our service to you as a Plan member or beneficiary;
  - ensuring that you are aware of your benefits and entitlements;
  - complying with our record-keeping duties;
  - ensuring that we pay the correct benefits at the correct time;
  - managing the risks to the Plan so that we can help to make your pension safe;
  - complying with all laws, guidance and codes that apply to the Trustee and/or the Plan, as well as with data requests from regulators, governments, courts and law enforcement authorities; and
  - minimising disruption to the Plan if there is ever a change to our business.

In relation to bulk annuity policies held by the Trustee or further policies under consideration, the insurers may process your data for internal compliance and business administration purposes; to fulfil their obligations under the policy, any re-insurance policy or hedging contract; and for statistical, financial modelling and reference purposes to the extent permitted by applicable law. The insurers may need to disclose your data to members of its group for those purposes, but will only do so on a strictly 'need-to-know' basis and in such a way as to preserve its strictly confidential nature. Data may also be transferred to re-insurers that the insurers work with. Where appropriate, this may involve data being transferred outside the UK or the European Economic Area (EEA) for the purposes outlined in this paragraph. If your personal data is transferred in this way the insurers will ensure it is protected in accordance with applicable law. .

We will only use your personal data for the purposes for which we collected it, unless we reasonably need to use it for a different reason that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will explain the legal basis which allows us to do so.

## **5. Keeping your personal data safe**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Further information is available by emailing [RBCPensions@willistowerswatson.com](mailto:RBCPensions@willistowerswatson.com) or by calling 01737 230 494. We also have procedures in place to deal with any suspected data security breach, should one arise.

### *Transfers of your personal data*

We may transfer, store, or process your personal data at a destination outside the UK or EEA (in the event that Plan data is processed in the EEA).. Where the countries to which your personal data is transferred may not offer an equivalent level of protection for personal data to the laws of the UK, we will take reasonable steps to ensure that your personal data is treated securely and in accordance with this notice. This may include entering into data transfer agreements to ensure that third parties to whom we transfer personal data in those countries commit to ensuring an adequate level of protection for your personal data. You may request a copy of the agreement that we rely on to transfer your personal data to third countries by emailing us.

Where we have not put a contract in place as a safeguard, we will take any other steps that we believe are necessary to protect your personal data based on an assessment of the particular transfer to this agent or adviser, and require the agent or adviser also to take any appropriate steps.

## **6. Sharing your personal data**

We may share or disclose your personal data to any of the following recipients:

- the sponsoring employers and the counterparties to the Plan's investments;
- our service providers and professional advisers such as the Plan's legal adviser, actuary, auditor, administrator and / or integrated services provider in connection with a pensions dashboard. The Plan's legal adviser, actuary and auditor may also be data controllers in relation to your personal data and have to comply with their own legal obligations, industry codes and standards when processing your data. Information about where to find their data protection information can be obtained by emailing [RBCPensions@willistowerswatson.com](mailto:RBCPensions@willistowerswatson.com) or by calling 01737 230 494.
- other third parties as required by law – for example, local or foreign regulators, governments and law enforcement authorities; local and foreign courts, tribunals and arbitrators or other judicial committees;
- insurance companies and its reinsurers; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of the Plan's sponsoring employers involving the Plan (including any potential or actual purchaser and their advisers).

If we share your personal data in this way, we require the transferee to implement appropriate security measures to protect your personal data and to treat it in accordance with the law. Except where the transferee is a data controller in its own right, we only permit the transferee to process your personal data in accordance with our instructions.

## **7. How long do we retain your personal data?**

We will hold your personal data (and any personal data collected in respect of any individual connected with you) on our systems for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements. The period may depend on the type of data and the purpose for which it is held.

## **8. Your rights regarding the personal data you provide to us**

You have the right, in accordance with the law:

- to request a copy of the personal data we hold about you, and to request information regarding the processing of your personal data (this is known as a 'data subject access request');
- to request the correction, completion and/or deletion of your personal data, or to request the restriction of processing of your personal data;
- in relation to personal data processed on the grounds of the legitimate interest of the Trustee or a third party, to object to the processing of your personal data;
- to complain to your local data protection authority, or to a court of law, if your data protection rights are violated. You may be entitled to claim compensation as a result of unlawful processing of your personal data.

You should be aware that taking any of the steps above could affect the payment of your benefits, the ability for you to build up benefits and our ability to answer questions relating to your benefits.

If you would like to exercise any of the rights described above, please let us know by emailing us at [RBCPensions@willistowerswatson.com](mailto:RBCPensions@willistowerswatson.com) or by calling 01737 230 494.

**9. What if you do not provide us with your personal data?**

We may not be able to perform actions necessary to achieve the purposes set out above and you may not be able to make use of the services offered by us or to receive pension benefits if you do not provide us with personal data that we may need to comply with our statutory or contractual obligations, as set out in section 4 above.

**10. Changes to our data protection arrangements**

**11. From time to time, we may update this privacy notice and the data protection arrangements described above. If we make any substantial changes, we will publish a new version of this notice. Your continued participation in the Plan, following these changes means that you accept the revised data protection arrangements.**

**How to contact us**

If you have any questions, comments or requests about this privacy notice, please contact Willis Towers Watson, our Plan administrators at:

Phone: 01737 230 494

Email: [RBCPensions@willistowerswatson.com](mailto:RBCPensions@willistowerswatson.com)

The Trustee's contact details are:

**RBC Pension Trustees Limited, 100 Bishopsgate, London EC2N 4AA**