

# United Airlines, Inc. U.K. Pension Plan (the "Plan") Privacy Notice

## PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR DEPENDANTS

### 1. INTRODUCTION

As Trustees of the Plan, we need to collect and use personal information about our members and their dependants.

This privacy notice sets out how we collect, use and protect your personal information, and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

For the purposes of data protection law, the Trustees are a 'data controller' in relation to your personal information.

The Plan's Actuary is also a 'data controller' in respect of your personal information that they use to carry out their work for the Plan.

### 2. PERSONAL INFORMATION WE USE

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Plan's sponsoring employer and information we get from other sources, including public databases.

#### 2.1. What information may we collect directly from you?

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

- a. personal details (for example, your name, gender and date of birth);
- 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; and
- e. if you have paid additional voluntary contributions to the Plan, your choice of fund for investing your contributions.

#### 2.2. What information may we collect from other sources (such as the Plan's sponsoring employer)?

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

- a. personal details (for example, your name, gender and date of birth);

- b. your contact details (for example, your address, phone number and email address); and
- c. information necessary to calculate and pay your benefits (for example, your employment history and salary).

#### 2.3. How will we use your personal information and why?

The ways we use your information include:

- a. identifying you and your dependants and making sure your details are up to date;
- b. communicating with you;
- c. calculating and paying your benefits and any benefits payable to your dependants;
- d. making trustee decisions – such as whether to agree to early retirement or how to distribute benefits after your death;
- e. calculating the actuarial liabilities of the Plan; and
- f. 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.

#### 2.4. Legal basis for using your personal information

We must have a legal reason to use your personal information. This will usually be one of the following:

- a. to fulfil our legal obligations, such as giving you specified information about your benefits as required by pension legislation;
- b. to meet our legitimate interests to administer the Plan efficiently and to pay benefits to you and your dependants in accordance with the Plan's rules;
- c. because we need to use the information to fulfill our obligations (for example, to pay ill health pensions or benefits after your death) and our use of the information is authorised by law;
- d. to meet the sponsoring employer's legitimate interests in managing and funding liabilities in the Plan; and
- e. because using the information is necessary in relation to a legal claim.

In a few cases, especially where you have given us information about your health, we may ask for your

consent to process your data. Where this applies, you may take back your consent at any time by contacting us.

### 3. INFORMATION SHARING

- 3.1. We may share personal information with:
- a. the Plan's administrators, payroll providers and our advisers (such as the Plan's Actuary, our auditors and our legal advisers) and their sub-contractors to facilitate the administration of the Plan and your benefits;
  - b. other medical advisers where you have requested an ill health pension;
  - c. His 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, reinsurance companies and their advisers with a view to investing in or securing benefits through long term insurance policies;
  - e. insurance brokers in connection with the Trustees' 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 which specialise in helping pension schemes to communicate with members about their benefits; and
  - i. qualifying pensions dashboard providers or to the Money and Pensions Service so that your pensions information is available via a dashboard service.

The Plan holds an insurance policy with Standard Life, the trading name of Phoenix Life Limited. Their privacy policy can be found here:

<https://www.plae.thephoenixgroup.com/en/privacy>.

We may also provide some of your personal information to United Airlines, Inc. and its advisers to help them to make decisions relevant to their role as the sponsoring employer of the Plan. We will only do so to the extent we consider necessary for these purposes.

### 4. SECURITY AND STORAGE

- 4.1. We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.
- 4.2. When sharing your personal information with our administrators 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 information only for the purposes we set out.

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

### 5. YOUR RIGHTS

You have rights regarding your personal information as follows:

**Right of access** – you have the right to request information about the processing of your personal information, see personal information 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 information we hold about you is inaccurate or wrong, you can ask to have it corrected.

**Right to restrict processing** – you can require the Trustees to restrict or limit the processing of your personal information in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.

**Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal information being processed, although the Trustees can override this objection in specific instances.

**Withdrawing consent** – where you have given us your consent to processing your personal information, you can withdraw that consent at any time by notifying us (see "How to contact us"). However, withdrawing your consent will not affect the processing of any personal information which took place beforehand and it may be possible for the Trustees to continue processing your personal information where this is justified.

**Right to be forgotten** – you can request that your personal information is deleted altogether, although the Trustees can override this request in certain circumstances.

**Right to complain** – you have the right to complain to the Information Commissioner's Office if your personal information rights are not complied with. See "How to contact us" for the Information Commissioner's Office's contact details.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Plan and/or our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

## 6. INTERNATIONAL DATA TRANSFER

Where your personal information is to be transferred outside the UK (for example by the administrator) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

## 7. CHANGES TO THIS POLICY

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are either notified to members or posted on the Plan's website at <https://epa.towerswatson.com/accounts/UAL>.

## 8. HOW TO CONTACT US

8.1 The Trustees are the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns, please contact the Plan's administrator WTW:

**WTW**  
**Sunderland**  
**SR43 4JU**

**[UAL@wtwco.com](mailto:UAL@wtwco.com)**  
**+44 (0) 1737 828116**

8.2. If you believe that we have not resolved your concerns, you can complain to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk) or by calling their helpline on 0303 123 1113.

8.3. We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.