

General Privacy Notice

Who we are

ALSTOM UK Pension Trustee Limited and ALSTOM UK VP Pension Trustee Limited are the trustees (“the Trustee”) of the Alstom UK Pension Plan, the Alstom UK 2003 Pension Scheme and the Alstom UK VP Pension Scheme (“the Schemes”).

As the Trustee of the Schemes, we hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries to enable us to run the Schemes and pay benefits. Most of the information held about you and processed by the Trustee in running the Schemes will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed. In addition, ALSTOM Engineering and Services Limited, Isio Group Limited (as the Scheme Actuary to the Alstom UK VP Pension Scheme) and Mercer (the Scheme Actuary to the Alstom UK Pension Plan and the Alstom UK 2003 Pension Scheme) are Joint Data Controllers, as they also hold and process personal data from which you as an individual can be identified. The Joint Data Controllers will sometimes need to make decisions jointly with the Trustee about how your personal data will be used.

In this notice, you will see information about what the Trustee does with your personal information, and also what the Joint Data Controllers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, ‘we’ means both the Trustee and the Joint Data Controllers where they are acting as joint controllers in relation to your personal data (as described above).

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- contact details (including your address, phone number and email address)
- your sex/gender (we use this to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. ‘Mr., Mrs., Ms., Mx.’)
- your national insurance number
- details of your employer, how long you worked for them and your salary from time to time
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death
- If your benefits from the Schemes form part of a divorce settlement, details of that settlement
- Details of any contributions paid by you or on your behalf to the Schemes
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Schemes
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries
- medical and other details about your health (where it is relevant to, for example, early payment of benefits from the Schemes)

- Correspondence received about you from HMRC
- Correspondence that we may have received about you from your appointed independent financial adviser.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Schemes and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Schemes' governing documents, as well as under relevant legislation.

Personal data relating to the Schemes is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Schemes, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special category data"). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as special category data. Except where the legislation allows it, this information cannot be processed or passed to a third party without your consent. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

Where we get that information from

Some of the information we have comes directly from you. In addition, Isio Group Limited (who administers the Schemes on behalf of the Trustee) may have obtained information from you and passed it to us.

Sometimes we get information from other sources: for example, from your employer or former employer (for information such as your salary and length of service); from another pension scheme if you have transferred benefits from that scheme; from government departments such as HMRC and DWP; and from publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and are trying to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Why we hold informational and who we share it with

We must by law provide benefits in accordance with the Schemes' governing documentation and must also meet other legal requirements in relation to the running of the Schemes.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud.

We also have a legitimate interest in properly administering the Schemes. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in the Pensions Regulator's guidance). We make sure that your own interests are not outweighed or prejudiced by our legitimate interests.

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

As the Trustee needs help from various advisers to properly administer the Scheme, we share personal data with the following:

- any new trustees or trustee directors
- your current, past or future Scheme employer which may include group companies which are based outside the EEA. Where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure
- the Scheme's professional advisers, including the Scheme actuary, auditor, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustee
- courts, the Pensions Ombudsman and law enforcement agencies
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the Information Commissioner's Office
- the advisers, data storage providers and printers who help us prepare various communications we send to you, such as the annual benefit statement, and tracing services
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK and/or a payment via the administrators' banking providers when pensions are being paid overseas.

When we need to use information about your health, we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use information about your health (or other very personal information, such as details about personal relationships relevant to who should receive benefits on your death) without consent, and we will do so where that is necessary to run the Schemes in a sensible way. You can withdraw your consent at any time by contacting us using the contact details given below. This may affect what we can do for you, unless we have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, but then you withdraw that consent,

we will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Schemes.

The Schemes' employers may also have a legitimate interest in contacting you about your pension benefits, and any additional options which may be available to you in relation to those benefits. In such circumstances, we may share your personal information with the employers so that they can contact you for that purpose.

Insurers

We may need to share personal data with insurers in relation to the purchase and pricing of insurance contracts called 'annuities' (unless that can happen based on anonymized data). Insurers will use that data to verify the assets and liabilities of the Schemes. We may write to you before purchasing an annuity to ask for up-to-date information about your spouse/partner/children/other dependants, for this purpose.

We will share your personal data when we purchase the annuity, and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). We will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Scheme membership ID number; marital status and details about spouse/partner; date of birth; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

Scheme Actuary

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustee and the Scheme Actuary for statistical research, but only in a form that no longer identifies you.

In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustee has anonymised before sharing with them.

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case,

they have responsibilities as controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from any of the people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary to make sure that we can satisfy our legal obligations in relation to the Schemes and pay any benefits due to or in respect of you. We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life and, in some cases, longer than this in order to process death benefits and deal with any queries from your dependants.

Your rights in relation to your personal information

- **Right of Access** – you have the right to see personal data 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 data we hold about you is inaccurate or incorrect, you can ask to have it corrected
- **Right to Restrict processing** – You can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to move** – You have the right in particular circumstances to move, copy or transfer your information
- **Right to object to processing** – As we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.
- **Withdrawing consent** – Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- **Right to be forgotten** – You can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.
- **Right not to be subject to decision-making** – You have the right not to be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

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

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances which we will explain to you where they are relevant.

To exercise these rights, please use our contact details, which are set out below. We can also supply more information about these rights to you, on request.

The Trustee will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise rights against us for what we do jointly with your personal information, you should contact the Trustee using the details below.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- make a complaint about how we have handled your personal data

please contact Hannah Dallas, Scheme Secretary, via email (Hannah.Dallas@isio.com), via telephone (028 9692 8721), or via post (*Isio Group, PO Box 163, BLYTH, NE24 9GS*).

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose can be contacted on 0303 123 1113 or at www.ico.org.uk/concerns.

Updates to this notice

This notice is the latest version as at July 2024. This notice will be updated from time to time and you can request to see the current version at any time by contacting Hannah Dallas (see 'Who to contact' above).