

Privacy Notice for the Adia Holdings (UK) Pension Scheme (the “Scheme”)

Capital Cranfield Trust Corporation Limited in its capacity as trustee of the Scheme (the “**Trustee**”) holds and processes personal data about you and other Scheme beneficiaries in order to run the Scheme.

In doing so, it complies with relevant data protection legislation.

What we do with your data

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme. This includes: the calculation, administration and payment of benefits under the Scheme before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, investment of the Scheme’s assets, and dealing with any queries or complaints regarding benefit entitlements.

The legal basis for doing so is in order for the Trustee to comply with its legal obligations and other legitimate interests, such as the efficient management of the Scheme.

Whilst much of the data we hold has been provided by you, we also hold and process data provided by Adecco UK Limited (the “**Principal Employer**”), or another group company, other schemes from where you might have transferred, HMRC, the DWP and regulatory bodies and by tracing organisations. We also receive information from you about your proposed beneficiaries who may be entitled to benefits on your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them.

The data we hold is to assist the Trustee to calculate and pay the benefits that you are entitled to, and this data may include your name, address, salary, years of service with the Scheme, date of birth, National Insurance number, contact details, including telephone number, mobile number and/or email address, details of any pension sharing orders made on divorce, financial information, such as bank account details, and pension entitlement, marital status, employment/retirement status and start date and leave date of membership with the Scheme.

We also hold some special categories or “sensitive” data about members for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will, in most circumstances, process this data in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). We may also, typically when considering claims under the Scheme’s Internal Dispute Resolution Procedure, process any sensitive data for the purposes of establishing, exercising or defending legal claims. If there are any occasions where we seek your explicit consent to process your sensitive data, then you can withdraw it at any time.

Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, Barnett Waddingham, as the Scheme Administration; Barnett Waddingham as the Scheme Actuary;

Squire Patton Boggs LLP as the Trustee's legal advisers; the Principal Employer; the Scheme's auditor; AVC providers, insurance providers, investment advisers, investment managers, other regulatory bodies (for example, HMRC, The Pensions Ombudsman, The Pensions Regulator, and the Money and Pensions Service).

In some circumstances we are joint controllers with the Scheme Actuary (and this Notice is provided on behalf of the Trustee and the Scheme Actuary, Rose Fell of Barnett Waddingham), our legal advisers (who may process your data to comply with their professional duties as advisers to the Trustee), and the Principal Employer. The Principal Employer holds your data to comply with its legal obligations as the sponsoring employer of the Scheme. The Trustee may share information with the Principal Employer, and their auditors and advisers for the purpose of running the Scheme.

The Principal Employer and the Scheme's advisers might require from time-to-time transfer data to other countries, including outside the UK and the EEA. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you for as long as is permitted in light of the purposes for which it was collected. Where we no longer require your information, we will retain it for a period of time which reasonably allows us to comply with our legal and regulatory obligations or if retention is advisable in light of our legal position.

Once your membership ends, we may decide to delete some of the data held in relation to you after six years. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

As Scheme Actuary, Barnett Waddingham does not store personal data for longer time than needed. However, information will be held for longer where it is considered appropriate in order to deal with any queries relating to your benefits which may arise after that time and to address any legal claims that might subsequently arise. Where there is no longer a legitimate reason to continue to store the personal data, it is deleted in a secure manner.

Your rights

You have the right to access your personal data, require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing, or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

This Privacy Notice is issued jointly by Capital Cranfield Trust Corporation Limited as the Trustee of the Adia Holdings (UK) Limited Pension Scheme and by Rose Fell (Scheme Actuary, Barnett Waddingham) as joint Data Controllers.

Contact details

If you have any questions about this, please contact the Secretary to the Trustee, Lucy Roach:

Address: Capital Cranfield Trust Corporation Ltd, 42 New Broad Street, London, EC2M 1JD

Telephone Number: 07596 873911 Email: l.roach@capitalcranfield.com

What if you have a complaint?

You have the right to make a complaint to the Trustee in relation to the processing of your personal data and can do so using the Scheme's Internal Dispute Resolution Procedure (IDRP). A copy of the Scheme's IDRP can be requested using the Contact details above and includes further information about the process. The Trustee will acknowledge your complaint within 30 days of receiving it and will let you know when they expect to be able to respond. This will depend on the nature and complexity of your complaint.

If you are not satisfied with our response, you have the right to lodge a complaint with a local data protection authority in the UK if you believe that we have not complied with applicable data protection laws.

The address for the UK data protection authority is as follows:

Information Commissioner's Office

Wycliffe House

Water Lane, Wilmslow

Cheshire, SK9 5AF

Tel. 0303 123 1113

Website: <https://ico.org.uk>

