



G4S PENSION SCHEME - PRIVACY NOTICE

G4S Trustees Limited (“the Trustee”), the trustee of the G4S Pension Scheme (“the Scheme”), is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (GDPR).

You don’t have to take any action. This is for information only.

We ask that you read this privacy notice carefully as it contains important information on how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

The Trustee collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the GDPR which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

The personal information we collect and use

Information collected by us

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We collect information from you and, if you are still employed by G4S, from your employer in relation to your membership of the G4S Pension Scheme. We may collect information from you when you contact us by post, email or phone or in any other way.

The personal data processed by the Scheme includes (but is not limited to) the following:

- Personal details such as name, gender, address, date of birth, National Insurance number, marital status, mobile phone number and email address.
- Financial details such as bank account and tax code for pensioners, pensionable salary, the type and amount of pension and associated benefits payable from the Scheme
- Your retirement date and retirement age
- Information provided by you in relation to benefits, complaints, or enquiries



- We may also hold details of how you would like any discretionary benefits payable on your death to be paid, which would mean we hold details of any relatives or dependants named by you.

Where we need to process medical information or other sensitive information we will generally ask you for your consent.

How we use your personal information

We use your personal information for the purposes of administering and managing the G4S Pension Scheme.

Reasons we can collect and use your personal information

The Trustee's lawful grounds for processing the Scheme's Data are that the processing is necessary:

- For compliance with a legal obligation to which the data controller is subject; and
- For the purposes of the legitimate interests pursued by the Trustee (as a data controller) or by certain third parties, such as the Scheme's employers.

In relation to special categories of data, the Trustee will usually seek explicit consent in writing from you .

Who we share your personal information with

We also share your personal information for the purposes of administering and managing the G4S Pension Scheme.

Recipients of your personal information may include:

- The company that carries out the administration of the scheme on behalf of the Trustee
- The company that carries out actuarial services such as scheme valuations. This company will be acting as "data controller".
- G4S plc and other participating employers where relevant
- the pension scheme's auditors
- Companies we use to print and post communications to you
- Payment providers such as your bank
- Insurance companies



- Additional Voluntary Contribution or defined contribution fund administrators where you hold such a fund, such as Aviva, Clerical Medical, Standard Life and Skandia (who will also be “data controllers”)
- The Trustee’s legal advisers (who will be acting as “data controllers”).
- Existence check providers
- HMRC, where we are making payments to you
- The Pensions Advisory Service and the Pensions Ombudsman, if they are investigating any complaints or disputes.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will only provide your personal information which we consider is necessary for the performance of that reason.

Whether we need your consent

The Trustee will not generally speaking rely on your consent as our lawful grounds for processing your personal data. However, we may seek your consent in respect of the processing of special categories of personal data, such as medical information.

How long your personal information will be kept

Pension benefits are built up and paid over a long period. We will retain your data until up to 15 years after the G4S Pension Scheme eventually winds up.

Transfer of your information out of the EEA

We may transfer, process and store your information outside the UK and the European Economic Area. As such, your personal information may be transferred to a country which has less protective data protection legislation in place than in the United Kingdom or the European Union. Where this is the case, we will ensure the appropriate security measures and controls are in place to protect your personal information as well as your rights in relation to that personal information. As such the transfers and disclosures will be made in accordance with applicable data protection laws and regulations, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) the relevant authority in the United Kingdom.

Your rights

Under the GDPR you have a number of important rights. Under certain circumstances, you can ask to:

- **Request access** to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address.



- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information, or request that its processing is restricted.
- **Request the transfer** of your personal information to another party.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation. In some circumstances you can claim compensation for damages caused by our breach of any data protection laws.

If you would like to exercise any of those rights, please:

- email, call or write to the Trustees at:

- G4Spensions@capita.co.uk

- 0345 120 0900

G4S Trustees Limited

Hartshead House

12 Cutlers Gate

Sheffield

S2 7TL

- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates.

It is important to note that some of the rights described above can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy law we will write to you to explain the reason for refusal.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact g4spensions@capita.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose



or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you have any questions about this privacy notice or how we handle your personal information, please contact the g4spensions@capita.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

This privacy notice was published in May 2018. It is non contractual and we reserve the right to amend it from time to time.

How to contact us

If you have any questions or wish to exercise any of the above rights you should contact us at:

G4Spensions@capita.co.uk

0345 120 0900

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