

CIGNA 2000 UK PENSION PLAN (the "Plan")

PRIVACY NOTICE

Your information

Cigna 2000 UK Pension Limited ("we"; "us"; "our") as Trustee of the Plan respects your privacy and is committed to protecting your personal information at all times.

This Privacy Notice sets out: (i) how we use your information; and (ii) the rights you have in line with our obligations under UK data protection law, including the Data Protection Act 2018 and General Data Protection Regulation ((EU) 2016/679 (together the "Data Protection Legislation").

As Trustee of the Plan, we act as Data Controllers (for the purposes of the Data Protection Legislation) in relation to the personal data which we process under the Plan.

Information we hold about you

To enable us to administer and operate the Plan, it is necessary for us to hold and process personal information about the Members of the Plan. This may include the following information:

- Name
- Member reference number
- Gender
- Date of birth
- Marital status
- Addresses
- E-mail addresses
- Telephone numbers
- National Insurance number
- Salary
- Employment history
- Information on physical and/or mental health, including medical information
- Information on the value of Member's benefits under the Plan
- Details of any spouse or civil partner
- Details of any former spouse or civil partner
- Details of any dependants
- Information on death benefit beneficiaries

We may also be required to process additional information about you in order to enable us to appropriately administer your benefits under the Plan.

How we use your information

We may use information about you and other Members to administer and operate the Plan and for the purposes of carrying out the following activities:

- (i) Providing information to Members on their individual pensions and benefits;
- (ii) Providing information to Members in relation to the Plan (for example, any legal or Plan changes);
- (iii) Calculating and paying out benefits to Members under the Plan;
- (iv) Calculating, assessing and managing the overall liability of the Plan;
- (v) Responding to queries raised by Members; and
- (vi) Carrying out Plan administration tasks.

Our legal basis for using your information

In most cases, we will process your information on the legal basis that it is necessary for the purposes of our legitimate interests in (i) administering the Plan correctly; and (ii) the effective running of the Plan.

We will also process your information where it is necessary to do so in order for us to comply with pensions legislation and/or any other applicable laws.

We will only process sensitive personal information about you (e.g. information on physical and/or mental health, racial or ethnic origin and sexual orientation) after you have provided your explicit consent.

How long we will retain your information

The information about you will be retained by us for the duration of your membership of the Plan or for any such longer period which is necessary to enable us to respond to questions relating to: your benefits under the Plan; any evidence of refunds of contributions; or transfer values.

Third parties with whom we share your information

We may need to share your information and information about other Members with third parties who act on our behalf or provide services to us. Your information will be kept secure at all times and will only be shared with such third parties when necessary. Your information may be disclosed to the following third parties for the following purposes:

- (i) Cigna European Services (UK) Limited and any other companies in its group in connection with the administration and management of the Plan.
- (ii) The Plan Actuary (currently Ruairi Campbell), actuaries, insurers, administrators, legal advisers and other third parties providing services in connection with the administration and management of the Plan.
- (iii) Third parties with whom Cigna European Services (UK) Limited and any other companies in its group is negotiating a commercial agreement (e.g. a business sale or joint business venture) or to trustees of other group pension schemes (and their advisers) where a merger or reorganisation of pension schemes is being discussed.
- (iv) The UK Government or any other public authorities or regulatory authorities if we are obliged to do so by any applicable laws.
- (v) Other pension schemes in the event that you request a transfer of your pension.
- (vi) Your solicitors or independent financial advisers in the event that such parties provide a letter of authority from you confirming that they have been instructed to act on your behalf.

Mercer and the Plan Actuary's processing activities as Data Controller

Appendix I of this Privacy Notice sets out details of Mercer Limited's and the Plan Actuary's processing activities as data controller and the safeguards in place.

Sources of information about you

We may collect information about you directly from you and/or from your representatives/advisers. In addition, we may also collect information about you from: Cigna European Services (UK) Limited and any other companies in its group; the Plan actuary; administrator; legal advisers and other third parties providing services in connection with the administration and management of the Plan. We may also collect information about you from: HMRC and other public authorities; your current or previous employers; and other pension schemes.

If your personal details change at any time, please inform us as soon as possible to ensure that all information held about you remains accurate and up to date.

Transfer of your information outside the UK

Please note that there may be instances where it will be necessary for us to transfer your information outside the UK, e.g. if we use service providers from another country. We shall put in place suitable safeguards to ensure that your information is held securely. If you require further information about the safeguards put in place you can request it from us by contacting us at the address set out below.

Your rights in relation to your information

You have a number of rights in relation to your information which we respect and aim to uphold in everything we do. These include the following:

- (i) you can ask us for a copy of the information we hold about you and a description of how we use that information;
- (ii) if you believe any information we hold on you may be inaccurate or incomplete, and you are unable to correct this information yourself, you can require us to rectify these inaccuracies;
- (iii) you can require us to erase your information in certain circumstances;
- (iv) where we process your information using automated means on the basis of your consent or to perform the agreement, you can request that we supply such information to another party;
- (v) you can require us to restrict our use of your information or object to how it is used in certain circumstances;
- (vi) where we process your information on the basis of our legitimate interests, you have the right to object to us processing your information in certain circumstances; and
- (vii) where you have given your consent to us to process your information for particular purposes (e.g. in relation to information about your health), you may withdraw this consent at any time.

How to contact us

If you have any questions about how we use your information or you wish to contact us about your rights or if you have any complaints about our use of your information, please contact us at:

- cigna.pensions@mercer.com
- Mercer Limited, 5 George Square, Glasgow G2 1AR

We will do our best to answer any question and resolve any complaint to your satisfaction. However, if you feel that we have not resolved your complaint, please note that you have the right to complain to the Information Commissioner's Office whose helpline number is 0303 123 1113.

Please note that this Privacy Notice may be updated from time to time. Any updates will be notified to you.

September 2021: Version 2

APPENDIX I

Mercer and the Plan Actuary's processing activities as data controller

- (a) Mercer Limited ("Mercer") and the Plan Actuary (currently Ruairi Campbell) process personal data to provide actuarial calculations and advice requested by the Trustee and to comply with statutory and regulatory obligations and maintain accounts and records. Mercer also uses personal information for data analytics purposes, including to create insights, reports and other analytics to better understand and improve the quality of and market Mercer's advice, products and services. The output of such analytics does not identify particular clients or individuals.
- (b) Mercer and the Plan Actuary collect and Process the following categories of Personal Data (including special categories of data) as data controllers:

Details such as a member's name, date of birth, gender, address, email address, telephone number, employer name, employment and pensionable service periods, salary, nature and details of current and historic pension arrangements, pension amounts, pension contributions, employee benefits, marital status, beneficiary details, bank details, national insurance number, medical records and/or ill-health status in relation to current, former and potential members of the pension scheme; beneficiaries of current, former and potential members of the pension scheme; and representatives of our client.

- (c) Except where Mercer (and the Plan Actuary) must rely on its client obtaining Data Subjects' consent to the Processing, the legal grounds Mercer (and the Plan Actuary) relies on in order to undertake such Processing are the "legitimate interests" ground, "compliance with a legal obligation" ground or "necessary for performance of a contract" ground.
- (d) Mercer and the Plan Actuary shall retain Personal Data that it Processes in accordance with its document retention and deletion policies and as required by law or in order to defend any actual or possible legal claims.
- (e) Mercer is an affiliate of Marsh & McLennan Companies, Inc. "**MMC**" and "**MMC Group**" shall mean the corporate group of MMC. MMC has adopted processor binding corporate rules in the form of the Processor standard (the "**Standard**") in order to provide adequate safeguards for transfers of Personal Data from certain MMC Group Affiliates to certain non-EEA MMC Group Affiliates. The Standard will be made available at <https://www.uk.mercer.com//data-protection.html>.
- (f) The transfer of Personal Data outside of the EEA or a country recognised by the European Commission as providing an adequate level of protection for personal data, shall be covered by a framework recognised by the relevant authorities or courts as providing an adequate level of protection for Personal Data, including but not limited to binding corporate rules, Standard Contractual Clauses or the EU-US Privacy Shield Framework.
- (g) You can contact Mercer's Data Protection Officer (DPO) at any time if you have any questions about Mercer or its scheme actuaries' privacy practices. The DPO's details are:

Data Protection Officer
Marsh & McLennan Companies, Inc.
Tower Place West
London
EC3R 5BU