

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, Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("EU GDPR") and EU GDPR as it forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 (including as further amended or modified by the laws of the United Kingdom or a part of the United Kingdom from time to time) ("UK GDPR") (together the "Data Protection Legislation").

As a 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.

Sources of information about you

We may collect information about you directly from you and/or from your representatives/advisers. If you do not provide your information then you may be unable to receive some or all of the benefits of the Plan. 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.

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 and other individuals who are affected by or have an effect on 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

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:

How your personal data is used	The type of information that is processed	Legal Basis for Processing
Administer and operate the Plan	Identity and contact details, health data, benefits under the Plan, employment information, family and dependent details, death benefit and beneficiaries details	<ul style="list-style-type: none">• Your consent• Our legal duty• Legitimate interests*
Providing information to Members on their individual pensions and benefits	Identity and contact details and benefits under the Plan	<ul style="list-style-type: none">• Your consent• Our legal duty
Providing information to Members in relation to the Plan (for example, any legal changes or changes to the Plan changes)	Identity and contact details and benefits under the Plan	<ul style="list-style-type: none">• Our legal duty
Calculating and paying out benefits to Members under the Plan	Identity and contact details, health data, benefits under the Plan	<ul style="list-style-type: none">• Our legal duty• Legitimate interests*
Calculating, assessing and managing the overall liability of the Plan	Identity and contact details, health data, benefits under the Plan employment information	<ul style="list-style-type: none">• Our legal duty• Legitimate interests*
Responding to queries raised by Members	Identity and contact details, health data, benefits under the Plan, employment information, family and dependent details, death benefit and beneficiaries details	<ul style="list-style-type: none">• Our legal duty• Legitimate interests*
Carrying out Plan administration tasks	Identity and contact details, health data, benefits under the Plan, employment information, family and dependent details, death benefit and beneficiaries details	<ul style="list-style-type: none">• Your consent• Our legal duty• Legitimate interests*

* Where we have indicated that your data will be use for the purposes of legitimate interests this means that the processing is required in relation to the proper administration of the Plan's trust and benefits.

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

We will only process special category personal data about you (e.g. information on physical and/or mental health) when we have your explicit consent or when the processing of your special category personal data is necessary for the establishment, exercise or defence of legal claims or substantial public interest reasons.

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

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.

The full privacy policy for Mercer can be found [here: www.mercer.com/en-gb/footer/data-protection](http://www.mercer.com/en-gb/footer/data-protection).

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. For example, 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, which are subject to exemptions:

- (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; you can require us to erase your information in certain circumstances;
- (iii) 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;
- (iv) you can require us to restrict our use of your information or object to how your information is used in certain circumstances;
- (v) 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;
- (vi) where we process your information to provide direct marketing you have the right to object to this use; and.
- (vii) where you have given your consent for 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.

Notwithstanding the above, there may be legal or other official reasons why we need to keep or use your personal data. Nevertheless, please tell us if you believe that we should not be using your personal data.

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@aptia-group.com
- Aptia, Maclaren House, Talbot Road, Stretford, Manchester, M32 0FP

The quickest and easiest way to engage with Aptia is online at Contact Aptia Pensions: pensionuk.aptia-group.com.

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 your local data Supervisory Authority.

- In the UK, this is the Information Commissioner's Office. You can reach the ICO via their website [here](https://ico.org.uk/make-a-complaint/) (<https://ico.org.uk/make-a-complaint/>) or via the phone on 0303 123 1113.
- If you're outside the UK, then click [here](https://edpb.europa.eu/about-edpb/about-edpb/members) (<https://edpb.europa.eu/about-edpb/about-edpb/members>) to find your local data supervisory authority.

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

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