

Privacy notice

1 Introduction

- 1.1 As the trustee of the Fujitsu Technology Solutions International Limited Pension Plan (the **Plan**), FRS Pension Trustee Company Limited (the **Trustee**) needs to use your personal data to administer your pension. This Privacy Notice explains how we use your information, the legal basis which allows us to use your information, how we share your information and your rights in relation to your information.
- 1.2 We review this privacy notice regularly, so if there are any changes to the way in which your personal data is used this notice will be updated and we will notify you of the changes.

2 What is personal data?

- 2.1 Personal data is information that tells you something about a living individual. This could include name, contact details and pension entitlement information.

3 How do we collect personal data?

- 3.1 We collected information from your employer and from you directly when you joined the Plan and we also collect it when you contact us by phone, text, letter or email.

4 What personal data do we collect?

- 4.1 We may collect, or have collected, the following types of personal data:
 - 4.1.1 your name, date of birth, email address, postal address, telephone or mobile number;
 - 4.1.2 your gender;
 - 4.1.3 information about your physical or mental health (where it is required for the purposes of the Plan and with your consent);
 - 4.1.4 identity documentation such as your national insurance number or passport number;
 - 4.1.5 information about your personal circumstances, such as your family life and details of dependants;

- 4.1.6 employment details such as pensionable pay, length of service, employment history, job title and job responsibilities, financial details such as income and salary;
- 4.1.7 bank account details to process pension payments; and
- 4.1.8 where required by law in connection with the transfer of your benefits in the Plan to:
 - (a) an overseas pension scheme, a copy of your formal residency documentation and at least two other forms of evidence confirming you are resident in the country or territory where the overseas scheme is established; or
 - (b) an occupational pension scheme, such information as required to establish you have an employment link to the receiving occupational pension scheme, such as a copy of a letter from your employer confirming this, your payslips, a schedule of pension contributions and copies of bank statements showing the deposit of salary for the relevant employment period.

These additional requirements do not apply in connection with the transfer of your benefits in the Plan to a personal pension scheme, in which case the personal data otherwise set out in paragraph 4.1 may be collected.

5 For what purposes do we use your personal data?

5.1 We use your personal data for the following purposes:

- 5.1.1 to administer the Plan, including to calculate and pay pension payments;
- 5.1.2 to carry out our obligations under any agreement that we have with you;
- 5.1.3 to respond to any queries that you raise or other correspondence that you send to us;
- 5.1.4 to notify you about our services and changes to our services;
- 5.1.5 for trend analysis purposes to enable us to improve our services;
- 5.1.6 to detect and prevent fraud;
- 5.1.7 to analyse the liabilities of the Plan and to help us ensure that the Plan is run properly and effectively;
- 5.1.8 for risk analysis and risk management purposes;
- 5.1.9 to comply with our legal obligations and professional codes;

- 5.1.10 to comply with information requests that we receive from regulators and law enforcement authorities or to comply with court orders;
- 5.1.11 in connection with any sale, merger, acquisition, disposal, reorganisation, restructuring or similar change to our organisation;
- 5.1.12 to obtain quotes from insurers in respect of a proposed buy-in or buy-out; and
- 5.1.13 in connection with any transfer of your benefits in the Plan to any other scheme or arrangement that is legally capable of accepting such a transfer.

6 What is the legal basis of our data processing?

6.1 We rely on the following conditions to enable us to process your personal data:

- 6.1.1 in some cases we have a legal obligation to process your personal data, for example, for anti-money laundering purposes;
- 6.1.2 it is in ours or a third party's legitimate interests to process your personal data. This is the case where we use your information to respond to an enquiry, for fraud prevention purposes, to comply with our legal and regulatory obligations, to ensure the effective running of the Plan (for example we need the information about your date of birth, gender, period of pensionable service and salary when in employment in order to ensure that the Plan is administered correctly), when we use data for our own analysis purposes, in order to obtain quotes from insurers or investment funds for potential Plan transactions and when we provide data to a third party in connection with a transfer of your benefits in the Plan to another scheme or arrangement.

6.2 In some cases we will need your consent to obtain and use your personal data. When this is the case, we will ask for your consent at the time when we collect the information and we will explain why we need the information at the time when we ask for your consent. If we are relying on consent, you can withdraw your consent to our processing of your personal data at any time by contacting us using the contact details below.

7 For how long do we keep your personal data?

7.1 We keep your personal data for as long as you are a member of the Plan and for a period of no longer than 7 years after that date (for example, if your benefits are transferred out) in case of any future claims, or for as long as is necessary in the circumstances.

8 How do we share your personal data?

8.1 We may share your information in the following ways:

- 8.1.1 we share your personal data with the Plan's administrator, Fujitsu Retirement Services Limited as the principal employer and members of its group of companies and the counterparties to the Plan's investments for the purposes of administering the Plan;
- 8.1.2 we share your personal data with our service providers, professional advisers and auditors when they need to have access to your personal data in order to advise us or provide services to us;
- 8.1.3 we share personal data with our regulators and law enforcement authorities and with courts, tribunals and arbitrators;
- 8.1.4 we may share personal data with insurers where we need to do so in order to obtain quotes or to put in place arrangements for a buy-in or buy-out policy. This is likely to include information relating to gender, date of birth, post codes, date of retirement, dependants, dates of joining/leaving the Plan, pension payments and spouse contingent pension liabilities. This information needs to be shared to enable insurers to provide quotes and to put in place insurance policies for the Plan;
- 8.1.5 we may share personal data in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of our business; and
- 8.1.6 we may share personal data with the trustees, or other related parties, of the receiving scheme in connection with any transfer of your benefits in the Plan to any other scheme or arrangement that is legally capable of accepting such a transfer.

9 Overseas transfers of your personal data

- 9.1 We may transfer, store, or process your personal data in locations outside the UK and the European Economic Area (**EEA**). Where the countries to which your personal data is transferred do not offer an equivalent level of protection for personal data to the laws of the UK, we will ensure that appropriate safeguards are put in place.
- 9.2 If you would like further information about the countries to which your information may be transferred and the safeguards in place please contact us using the contact details below.

10 Your rights in relation to your personal data

- 10.1 You have a number of rights in relation to your personal data, these include the right to:
 - 10.1.1 request that your personal data is corrected if you believe it is incorrect or inaccurate; and
 - 10.1.2 obtain a copy of your personal data that we hold.

10.2 In addition, you have the following rights:

10.2.1 a right to ask us to restrict our data processing activities where you consider that: data is inaccurate; our processing of your personal data is unlawful; where we no longer need the personal data but you require us to keep it to enable you to establish, exercise or defend a legal claim; or where you have raised an objection to our use of your personal data;

10.2.2 a right to object to our processing of your personal data where we are relying on legitimate interests to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data; and

10.2.3 a right to request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to perform our agreement with you and personal data where we are relying on consent to process your data.

10.3 If you would like to exercise any of your rights or find out more, please contact us using the details below.

11 Complaints

If you have any complaints about the way we use your personal information please contact a director of the Trustee, who will try to resolve the issue. If the issue cannot be resolved, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK). If you need more information about how to contact your local data protection authority please let us know by contacting the Secretary to the Trustee of the Fujitsu Technology Solutions International Limited Pension Plan, Capita Pension Solutions Limited, PO Box 555, Stead House, Darlington, DL1 9YT.

12 Contact details

If you have any questions, comments or requests regarding any aspect of this Privacy Notice, please do not hesitate to contact the Trustee using the following contact information:

The Secretary to the Trustee of the Fujitsu Technology Solutions International Limited Pension Plan
Capita Pension Solutions Limited
PO Box 555
Stead House
Darlington
DL1 9YT

Telephone: 01227 773914
Email: fujitsupensions@capita.co.uk