

ROCHE PENSION FUND (THE 'FUND')

PRIVACY NOTICE

Data controller: Roche Products Pension Trust Limited, incorporated and registered in England and Wales with company number 477695 whose registered office is at 6 Falcon Way, Shire Park, Welwyn Garden City, AL7 1TW.

As the Trustee of the Fund, we collect and process personal data relating to the Fund's members and other beneficiaries. We are committed to being transparent about how we collect and use this data and to meeting our data protection obligations.

What information do we collect?

We may collect and process a range of personal data about you and, where relevant, your beneficiaries and/or dependants.

The personal data we hold will depend on your personal circumstances such as whether you are a member or beneficiary and if you are a member, on your membership status (e.g. whether you are active, deferred or pensioner member) and on whether you choose to take up certain options available under the Fund.

The personal data we hold may, for example, include:

- ▶ your name, contact details (including your address), date of birth and gender;
- ▶ information about your salary, membership and employment history and benefit entitlements;
- ▶ details of your bank account, National Insurance number and tax information;
- ▶ information about your marital status, dependants or other potential beneficiaries (for example, if you complete an expression of wish form); and
- ▶ information about medical or health conditions (for example, if you apply for ill-health retirement).

Some of this information may be 'sensitive' personal data (also referred to as 'special categories of personal data'), such as information about your health.

We collect this personal data from a variety of sources including:

- ▶ from you (we may collect this directly or one of our representatives may collect it on our behalf, for example, in forms you complete regarding your membership and benefits);
- ▶ from your current or former employer;
- ▶ from persons acting as personal representatives of a deceased member's estate, your next-of-kin or as part of other enquiries we undertake when a member dies;
- ▶ from a public body such as HMRC;
- ▶ from public databases such as the Register of Births, Deaths and Marriages;
- ▶ from other pension schemes from which transfers into the Fund have been made;
- ▶ from an independent financial adviser, solicitor or other person instructed by an individual to provide us with information;
- ▶ from our advisers;
- ▶ from third parties who are involved in the operation of the Fund, for example, companies used to trace members or beneficiaries with whom we have lost contact; and
- ▶ with your consent, from a registered medical practitioner.

This personal data is stored in a range of different places, including in your Fund membership file, which forms part of the Fund's administration system and scheme records.

Why does the Trustee process personal data?

We process personal data where it is necessary:

- ▶ to comply with our legal obligations under the documents governing the Fund and legislation governing the operation of pension schemes; and
- ▶ where we have a legitimate interest in holding and processing personal data in order to properly administer and manage the Fund and its liabilities.

The primary purpose for which we collect, hold and use personal data is so that we can properly administer and manage the Fund. For example, so that we can ensure that benefits are calculated correctly, properly funded for and paid to or in respect of the right person at the right time – both now and in the future. We also use personal data to communicate with you about your membership and benefit options, to give you relevant information and to deal with queries or complaints.

We may also use personal data for related purposes, such as to help enhance or improve the way we operate the Fund, secure and provide benefits in future or to provide you with new options.

Where we rely on legitimate interests as a reason for processing personal data, we have considered whether or not those interests are overridden by the rights and freedoms of employees or workers and have concluded that they are not. You can object to processing undertaken on the basis of legitimate interests. However, we may be able to override an objection in certain circumstances.

Where we need to use sensitive personal data, further legal grounds apply. This means that in most cases, we will need an individual's explicit consent to use their sensitive personal data, unless they have made the relevant information manifestly public or it is required to establish, exercise or defend legal claims.

Where we are relying on consent, an individual has the right to withdraw their consent although this will not affect the legality of any processing undertaken on this basis before the withdrawal of consent. Further information about this will be provided at the time the relevant consent is obtained.

Who has access to your data?

We share your personal data with various individuals and organisations who are, or may in future become, involved in the day-to-day operation or wider management of the Fund and its liabilities. For example:

- ▶ The secretary to the Trustee.
- ▶ The administrators, who are responsible for the Fund's day-to-day administration.
- ▶ Our professional advisers, including the Fund's Actuary, actuarial advisers, auditor, medical advisers, investment advisers, benefit consultants, annuity/retirement brokers and lawyers.
- ▶ The communication consultants and printers who help prepare various communications which are sent to members and beneficiaries.
- ▶ Appointed providers of life insurance and DC investments (including additional voluntary contributions), tracing bureaux for mortality screening and locating members and other beneficiaries.
- ▶ Organisations to whom personal data is sent to effect pension or other benefit payments whether in the UK or overseas.
- ▶ Government and Regulatory bodies (e.g. HMRC and the Pensions Regulator) and other third parties as required by law.
- ▶ UK courts for the purposes of processing pension sharing orders.
- ▶ If we make investments or seek to secure or provide benefits for members in different ways, such as through the use of insurance, to the providers (or potential providers) of those investments or other arrangements.

Sharing personal data with Roche

We share personal data with Roche's in-house pensions team for many reasons such as checking benefits are correct, establishing eligibility for benefits, ensuring contributions are being processed appropriately and dealing with day-to-day queries.

We may also share personal data with Roche and its wider group as the sponsor of the Fund for other purposes for which they have a legitimate interest in processing the personal data. For example, we may share personal data to help Roche assess or 'benchmark' its pension provision or plan how to best support the Fund and manage its liabilities in the future.

Who is responsible for your personal data?

As a data controller, we are responsible for how the Fund uses your personal data.

Some of the organisations and individuals we share your personal data with will act as our 'data processors' and will simply process your personal data on our behalf and in accordance with our instructions. However, they do have certain responsibilities under data protection legislation and their contract with us.

Others will also act as 'data controllers' either jointly with us or separately. This means they will therefore be responsible to you directly for their use of the personal data that we share with them.

The Fund's Actuary and actuarial advisers use personal data to help us to calculate benefits and work out how much money needs to be paid into the Fund now and in the future to ensure we can pay out benefits when they fall due. The nature of their role means that they are data controllers. You can get more information about how they use personal data when providing their advice at www.willistowerswatson.com/en-gb/notices/How-Willis-Towers-Watson-uses-personal-data-for-actuarial-services-to-UK-pension-scheme-trustees

Sharing data outside the UK

Although the Fund is based in the UK, your personal data may be transferred to countries outside the UK or European Economic Area (EEA) (as applicable) in some circumstances. For example, if one of the organisations we share personal data with undertakes part of their services outside the UK or EEA (as applicable) (for example, they may use IT servers or back-up services which are based out of the UK or EEA (as applicable)), or if you live or have worked for Roche outside the UK or EEA (as applicable), or want to transfer your benefits abroad. However, personal data will only be shared outside the UK or EEA (as applicable) where appropriate safeguards are in place.



How do we protect personal data?

We take the security of your personal data very seriously and will ensure that we have appropriate measures in place to protect your personal data.

Where we engage third parties to process personal data on our behalf (i.e. as 'data processors'), they are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of your personal data.

For how long do we keep data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

The nature of the Fund means that we are likely to need to keep at least some of your personal data for a long time so that we can comply with our regulatory and record keeping requirements, pay out your benefits and any benefits payable in the event of your death, deal with any queries or complaints about those benefits and manage the Fund and its liabilities.

We will review the personal data we hold in accordance with our retention policies to determine whether it continues to be needed. If we decide that any personal data that we hold is no longer needed, we will take steps to ensure that it is securely destroyed, erased or made inaccessible.

Your rights

You have a number of rights in relation to the personal data we hold about you. You can:

- ▶ access and obtain information about the processing of your data on request;
- ▶ require us to change incorrect or incomplete data;
- ▶ require us to delete or stop processing your data in some circumstances, for example where the data is no longer necessary for the purposes of processing;
- ▶ object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing;
- ▶ ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data; and
- ▶ ask us to transfer your personal data to another data controller (known as *data portability*).

If you would like to exercise any of these rights, please contact the Secretary to the Trustee at the address set out above.

There is generally no fee charged for us to provide this data, but we reserve the right to charge a reasonable fee in certain circumstances. We can also, in some circumstances, override or refuse to act on certain requests.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner on 0303 123 1113 or at www.ico.org.uk, where you can also get further information about data protection and your rights.

What if you do not provide personal data or restrict our ability to use it?

If you don't provide your personal data, or you exercise your rights to restrict the way we can use your personal data, this may affect your membership of the Fund and our ability to pay benefits to or in respect of you. It may also prevent you from exercising certain rights or options which may otherwise be available to you under the Fund.

Automated decision-making

We do not make any decisions based solely on automated decision-making.

Personal data about others

If you have provided us with personal data about other individuals, such as family members or your other dependants or nominees, you may want to share this Privacy Notice with them so that they are also aware of the basis on which we will use and protect their personal data and of their data rights.

Changes to this Privacy Notice

We will review this Privacy Notice from time to time and update it if we make any significant changes affecting how we use personal data.

Questions

If you have any questions about how we use your personal data you can contact the Secretary to the Trustee at the address set out above.

January 2024

This Privacy Notice is available by contacting the Trustee at the address set out above.