



GEHPP

Your GE HealthCare Pension Plan

Personal information and what we do with it





The Trustee of the GE HealthCare Pension Plan (the 'Plan') needs personal information about you to run the Plan and pay benefits.

Similarly, other parties involved in running the Plan will sometimes need to make decisions jointly with the Trustee about how your personal information will be used for those purposes. These other parties (our 'Trustee Advisers') include the Plan Actuary (currently Heather Boucher of WTW).

In this notice, you will see information about what the Trustee does with your personal information, and also what the Trustee Advisers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, 'we' or 'us' means both the Trustee and the Trustee Advisers where they are acting as joint controllers in relation to your personal information (as described above).

Please note that this is the Trustee's notice which also describes what the Trustee Advisers do with data. You can see a more complete notice about what the Plan Actuary does with your data at www.wtwco.com/en-GB/Notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees. To be clear – this notice relates to WTW as the Plan Actuary and not in their role as the Plan administrator (see below).

What personal information we hold

We normally hold some or all of the following types of personal information:

- Your name and previous or alternate names, date of birth, national insurance number (NINO) and/or partial or 'dummy' NINO and bank account information (where benefits are in payment).
- Your sex/gender (we use this to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. 'Mr., Mrs., Ms.')
- Contact details (including your address, former address, phone number and email address).
- Details of benefits under the Scheme, including contributions paid, additional voluntary contributions (AVCs), service dates and projected benefits.
- If your benefits from the Plan derive from your employment, details of your employer when you were building up benefits in the Plan, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- Electronic "pension identifiers" for Pension Dashboards (explained below).
- If your benefits from the Plan form part of a divorce settlement, details of that settlement.
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Plan.
- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state pension.
- Correspondence that we may have received about you from your appointed independent financial adviser.
- Other personal information which you voluntarily provide to us in your correspondence or communications and which is about yourself and other people (please note: we do not wish to collect additional and what might be unnecessary personal information in this way – please do only send us the categories of personal information we ask you for or which our administrator (details below) specifically asks you for on our behalf).

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Plan, or details about personal relationships to determine who should receive benefits on your death which could include data concerning your sexual orientation. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Plan benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information.

For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an “employment link”. This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

Pension Dashboards

The government has created a framework for pensions dashboards, designed to help people access information about their pensions online in one place. As part of this, we are required by law to match certain members (who search on dashboards) with their pensions ecosystem (including the identity service, the pension finder service, the consent and authorisation service) so that it can be displayed when certain members ask to see it on a dashboard.

These activities may involve sharing member data with entities within the dashboards ecosystem, non-commercial dashboards and commercial dashboards and with the provider(s)/the integrated service provider(s)/administrator we appoint to help us in connecting to dashboards, matching people with their pensions and complying with our other dashboard duties. As part of these dashboard duties, we may also need to report information (which could potentially include personal data) to other bodies including the Money and Pensions Service, the Pensions Regulator and the Financial Conduct Authority.

Where we get personal information from

Some of the information the Trustee has comes directly from you.

In addition, WTW, who also administer the Plan on behalf of the Trustee may have obtained information from you and passed it to us. The Trustee may then in turn pass information about you to the Trustee Advisers or may instruct the administrator to do so. The Trustee is the source of the personal information which the Trustee Advisers have about you.

Sometimes the Trustee gets information from other sources: for example, from your Plan employer; from another plan if you have transferred benefits from that plan; from government departments such as HMRC and DWP; and from publicly accessible sources (e.g. the electoral roll or through tracing agencies) if the Trustee has lost touch with you and is trying to find you. The Trustee may in turn pass this to the Trustee Advisers (as above).

Some of your personal data may be collected indirectly through the pensions dashboards ecosystem (including the identity service, the pension finder service, the consent and authorisation service). Where we obtain personal data from the dashboards ecosystem, or during the process of matching members with their Plan benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that the person is a member entitled to receive information about their benefits on dashboards and to help us administer the Plan.

If the Trustee asks you for other information in the future (for example, about your health), it will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Why we hold personal information and how we share it

The Trustee must by law provide benefits in accordance with the Plan's governing documentation and must also meet other legal requirements in relation to the running of the Plan.

The Trustee will use your personal information to comply with these legal obligations, to establish and defend its legal rights, and to prevent and detect crimes such as fraud. The Trustee may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

Pensions dashboards regulations impose a legal obligation on us to match certain members with their pensions and provide information on their pension benefits. Testing data and getting ready for pensions dashboards compliance can also be part of our legal obligations.

The Trustee also has a legitimate interest in properly administering the Plan. This includes: paying benefits as they fall due; purchasing insurance contracts; purchasing insurance contracts; arranging for annuities (more details below); communicating with you, testing data and getting ready for Pensions Dashboards compliance can also be part of our legitimate interests; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Plan governance are met (including standards set out in Pensions Regulator guidance).

To achieve this, the Trustee may share your personal information with various people as necessary, including (but not limited to): any new trustees or trustee directors; the Plan employers; the Plan administrator; the Trustee Advisers; the Trustee's other professional advisers; consultants; lawyers; investment consultants; communications consultants (including printers); auditors; insurers; HMRC; DWP; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; the Financial Conduct Authority; IT and data storage providers and other service providers, such as printers who help us prepare communications which we send to members, and tracking and tracing services; integrated service provider(s) (relevant to pensions dashboards compliance, as described above), Pensions dashboards ecosystem (as described above), non-commercial dashboards and commercial dashboards, the Money and Pensions Service. In addition, the Trustee may share it with other service providers such as HealthPartners who is a provider of occupational health services (see more details below about this).

If your benefits are transferred to another Plan, the Trustee will also need to provide the administrators of that Plan with information about you.

When the Trustee needs to use information about your health (or other very personal information), it may ask for your consent. However, sometimes there may be reasons of public interest or social protection or law which enable the Trustee to use information about your health (or other very personal information, such as details about personal relationships relevant to who should receive benefits on your death which might reveal your sexual orientation) without consent, and it will do so where that is necessary to run the Plan in a sensible way. You can withdraw your consent at any time by contacting the Trustee using the contact details given below. This may affect what the Trustee can do for you, unless it has another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to the Trustee processing your health data for that, but then you withdraw that consent, the Trustee will usually be unable to consider your application.

If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes we need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims. Sometimes the Trustee will need to process criminal convictions and offenses data when administering the Plan in accordance with its duties.

The Trustee may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Plan.

The Plan's employers may also have a legitimate interest in contacting you about your benefits under the Plan, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustee may share your personal information with the employers so that they can contact you for that purpose.

Insurers

The Trustee will need to share personal data with insurers in relation to the purchase and pricing of insurance contracts called 'annuities'. This will also happen for preparatory work ahead of the Trustee purchasing the annuity. Insurers will use that data to verify the assets and liabilities of the Plan. The Trustee will write to you before purchasing an annuity to ask for up-to-date information about your spouse/partner/other dependants, for this purpose.

Insurers will keep your data throughout the term of its annuity (and after that if they need to). If any particular annuity doesn't go ahead the insurer will keep your data if it needs to and if that happens the Trustee will ask the insurer to keep it secure and protect it in accordance with data protection laws.

Insurers will share your personal data with their chosen re-insurers. The insurer's privacy notice will explain that you can request a list of reinsurers who have your personal data by using the "contact us" details for the insurer. This is how you can find out how to access the privacy notices of the reinsurers.

The Trustee will usually need to write to members to explain about the particular annuity and who the chosen insurer is. In this way you can know who holds your personal data.

The following personal data would typically to be shared with insurers for annuities: your full name and date of birth and those of your spouse/partner/other dependants; image of your birth certificate so that the insurers can verify your date of birth; your Plan membership ID number; your marital status and all the details about your spouse/partner/other dependants which is held on your member record; copies of the forms you return to the Plan administrator about your spouse/partner/other dependants so that the insurers can validate the data provided to them by the Plan; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date; ill health early retirement status of a member; marriage/civil partnership evidence (in particular, for current beneficiaries in receipt of a pension following the death of their spouse/civil partner who was a member of the Plan, official documentation evidencing

the marriage/civil partnership may be shared with insurers and their reinsurers) and any other information held on a member's record, excluding electronic documents.

Names are needed so the insurers can carry out their own checks using publicly available records about people who are living and deceased. This includes existence tracing.

Plan Actuary

The Plan Actuary is appointed by the Trustee to value the Plan benefits and carry out other calculations in relation to your Plan benefits. The Plan Actuary will use your personal information for this purpose and has a legitimate interest in doing so. The Plan Actuary will also use your personal information to comply with his/her own legal obligations, and may need to share your details with other people, such as courts and law enforcement agencies, for legal reasons. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustee and the Plan Actuary for statistical research, but only in a form that no longer identifies you. In some circumstances the Plan Actuary may also be able to fulfil the purpose mentioned above using information which the Trustee has anonymised before sharing with them.

Buy-in transaction

Our buy-in transaction requires us to share personal data with Rothesay concerning you and your benefits under the Plan. Rothesay is a controller in relation to your data and will control the processing of your personal data separately to the Trustee. Rothesay must, therefore, adhere to the strict controls that the law imposes on data controllers. A copy of Rothesay's privacy notice, providing further information about how Rothesay will use your personal data, can be found in the "Members of pension schemes" section of Rothesay's data protection webpage

<https://www.rothesay.com/data-protection/>

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way we tell them. However, others (including the Trustee Advisers) may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements.

In such a case, they have responsibilities as controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from the Trustee Advisers or from any other people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustee and it will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information for long enough to make sure that we can satisfy our legal obligations in relation to the Plan (including if your data originated from the Pensions Dashboards ecosystem and if you were matched up with the Plan through that) and have enough information to:

- pay any benefits due to or in respect to you;
- answer any queries you (or others acting on your behalf) may have about your benefits;
- respond to any complaints or other claims; and
- satisfy our legal obligations in relation to the Plan.

To meet this aim, the personal information that we hold will be kept for however long we sensibly think we need it to deal with queries from you or your beneficiaries/other persons who might ask us if they are entitled to payments, complaints (from you or them) and our legal obligations mentioned above.

Data from the pensions dashboards ecosystem is kept for the life of your member record, if we do find a match (i.e. if you are a member of the Plan).

If we don't find a match (i.e. if you're not a member of the Plan), we will delete the data from the dashboard straightaway.

If we find a potential match, we will keep the data from the dashboard for 30 days in a hash/token form (which helps with security of it) so that we have more time to determine whether there's a match or not. We will delete it after 30 days if there is no match, or keep it for the life of your member record if we do find a match.

Your rights in relation to your personal information

You have rights in relation to the personal information we hold about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use the Plan administrator's contact details, which are set out below. The Plan administrator can also supply more information about these rights to you, on request.

The Trustee has agreed with the Trustee Advisers that the Trustee will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise rights against the Trustee and the Trustee Advisers for what they do jointly with your personal information, you should contact the Trustee via the Plan administrator using the contact details set out on the next page.



Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Where your information is transferred outside the UK at your request e.g. in connection with an overseas pension transfer, or because your address is outside the UK, this will be with your consent.

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact the Trustee via the Plan administrator at:

- ✦ **GEHealthcare@wtwco.com**
- ✦ **01737 235284** (lines are open 9am to 5pm, Monday to Friday)
- ✦ **GE HealthCare Pension Plan,**
WTW, Sunderland
SR43 4JU

Other service providers

Aon is a controller separate and distinct from the Trustee for the secretarial services it provides specifically in relation to handling member correspondence and complaints under the internal disputes resolution process.

HealthPartners, who is a provider of occupational health services, has its own privacy notice for what it does as data controller independent of the Trustee is in the “data protection guide” which is issued on its portal and with each appointment. It will be shared with you directly by HealthPartners when relevant.

Please note that Aon is not what is described above as ‘Trustee Advisers’ and that is why you will need to contact Aon directly if you wish to exercise rights against it. Aon is not acting jointly with the Trustee when it makes decisions using personal information about you. This means that you will need to read the Aon privacy notice available here: **www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp** to find out about how it processes your personal information and you will need to contact Aon directly using the details in its own privacy notice (Data Protection Officer, Aon Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH RI.UK. **PrivacyChampions@aon.com**) if you wish to exercise rights under data protection laws against Aon.