

SCHEDULE 5 – PRIVACY STATEMENT (UPDATED JUNE 2021)

We're sending you this privacy policy to help you understand how we collect, store and use your personal information for the purposes of the ING UK Pension Fund (the "**Fund**"). **This is for information only – you do not have to take any action in response to this information.**

1. Introduction

The Trustees of the ING UK Pension Fund (the "**Trustees**" or "**we**" or "**us**") collect and use your personal information in order to administer the Fund and to pay benefits due to Fund members and other beneficiaries.

The Trustees are committed to protecting your personal information. This statement tells you more about when, from whom and why the Trustees collect your personal information and how we use it.

The Trustees are the data controller of the personal information to which this notice relates; we can be contacted using the details in section 10.

2. Personal information that we collect

The types of personal information that we may collect and use include:

- Your full name, address and contact details
- Your date of birth
- Your sex/gender
- Your marital (or relationship) status
- Your benefit entitlement under the Fund
- Information about your health
- National Insurance Number and/or other evidence of identity
- Details of your salary and other forms of remuneration
- Details of your bank account
- Details of any relatives, dependants or nominees to be considered for benefits in the event of your death.

3. Where does your personal information come from?

Most of the personal information that we hold is provided by members when they join the Fund or when they contact the Trustees (or organisations appointed by the Trustees to help with the running of the Fund) about their benefits.

Other information about you may be provided by current and former employers participating in the Fund, other pension schemes and pension providers, independent financial advisers, medical practitioners, other advisers or service providers to the Trustees and Her Majesty's Revenue and Customs (HMRC).

4. What do the Trustees do with your personal information?

The legal basis for us using your personal information is to enable us to comply with our legal obligations as trustees of the Fund, which include paying benefits to you and other beneficiaries in connection with members' employment (or previous employment) with an employer participating in the Fund or a predecessor pension scheme which merged with the Fund. We also have a legitimate interest in using your personal information to ensure the efficient administration of the Fund, including preventing and detecting fraud, and to help us and the employers participating in the Fund review and manage financial matters relating to the Fund, together with our respective advisers.

In some limited circumstances, the Trustees will only collect and use certain special categories of personal information with your express consent. We will make clear to you when your consent is needed.

If we are not provided with the personal information about you that we need, it may not be possible for us to provide some or all of the benefits otherwise payable in respect of you from the Fund.

5. Sharing your personal information with other parties

Where the Trustees consider it necessary for the purposes explained in section 4, your personal information may be shared with selected third parties, such as the Trustees' actuarial and financial advisers and other professional services providers, including those who provide data processing, administration and communication services to the Fund. The Trustees may also share personal information with regulatory authorities and healthcare practitioners, insurers, AVC providers, financial advisers, annuity brokers, employers participating in the Fund, HMRC, the Pensions Regulator, the Cabinet Office National Fraud Initiative or other agencies to assist in preventing and detecting fraud, and any other third parties with whom we are authorised or required by law to share personal information.

Some of the third parties with whom your personal information is shared may be located outside the United Kingdom (for example, this may happen if computer servers used by our providers are located or backed up in a country outside the United Kingdom).

Under data protection legislation, we can allow your personal information to be transferred outside the United Kingdom if:

- (a) the country to which your personal information is being transferred has been recognised by the United Kingdom Government to provide adequate protection for personal information; or
- (b) the entity that is holding your personal information has entered into a written contract which requires it to provide all protections to your personal information required by data protection legislation.

Further information about transfers of personal data outside the United Kingdom can be obtained by contacting us at the address on the following page.

We will also share personal information with the Scheme Actuary to the Fund. The Scheme Actuary to the Fund is a joint data controller with the Trustees when using personal information held in respect of you for the purposes of assessing, with the Trustees, financial matters affecting the Fund. The current Scheme Actuary to the Fund is Charles Rodgers whose address is Willis Towers Watson, 51 Lime Street, London, EC3M 7DQ.

6. How long do the Trustees keep your personal information for?

The Trustees will keep your personal information in accordance with our data retention policy as it applies from time to time. We will need to keep personal information for as long as is reasonably necessary to determine members' entitlement to benefits from the Fund and to comply with our legal obligations in relation to the administration of the Fund.

7. Accessing and updating your personal information

Data protection legislation gives individuals the following rights in relation to personal information held about them:

- individuals can ask what personal information is held about them and be provided with a copy;
- if personal information held about an individual is incorrect, he or she can ask for it to be corrected;
- individuals can ask for personal information about them to be deleted or for processing of that personal information to cease in certain circumstances, for example, where that information is no longer needed;
- individuals can request that certain types of personal information held about them is sent to them, or another organisation, in a format that can be read by computer; and
- individuals can withdraw their consent to how their personal information is being processed, where that processing is based on their consent.

Exercising these rights is subject to certain restrictions under data protection legislation. For further information about these rights, you should contact us using the details in section 10.

8. Complaints

If you are unhappy at any stage with how the Trustees are using your personal information, you have the right to lodge a complaint with The Information Commissioner's Office (www.ico.org.uk).

9. Changes to our privacy policy

This statement is subject to regular review and may be updated from time to time. We will tell you if we make any changes to how we use your personal information.

10. Contact us

If you have any questions about how your personal information is used, including in relation to the arrangements we have in place with the Scheme Actuary to the Fund, please feel free to contact us at the following address: Trustees of the ING UK Pension Fund, c/o Capita Employee Benefits Limited, 145 Morrison Street, Edinburgh, EH3 8FJ