

GE Capital Pension Scheme

Personal information and what we do with it

GE Aerospace Pension Trustees Limited ('**Trustee**') is the Trustee of the GE Capital Pension Scheme (the '**Scheme**'). The Trustee needs personal information about you to run the Scheme and pay benefits. Similarly, other parties involved in running the Scheme 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 Scheme Actuary (currently Gareth Boyd of WTW).

In legal terms, the Trustee and the Trustee Advisers are 'joint controllers' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

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' 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 Scheme Actuary does with your data at www.willistowerswatson.com/personal-data. To be clear – this notice relates to WTW as the Scheme Actuary and not in their role as the Scheme 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.
- Your date of birth, National Insurance number ('**NINO**') and/or partial or "dummy" NINO where relevant to what we do for Pensions Dashboards (see below).
- Your bank account information (where benefits are in payment).
- Your sex in order to understand the benefits payable to you and for the purposes of some actuarial calculations
- Contact details (including your address, former addresses, phone number and email address).
- If your benefits from the Scheme derive from your employment, details of your employer when you were building up benefits in the Scheme, how long you worked for them (i.e. length of pensionable service) 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, including who you would like to receive those benefits.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Scheme 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 Scheme.
- Details of any contributions paid by you or on your behalf to the Scheme, including additional voluntary contributions.
- 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).
- Electronic "pension identifiers" for Pension Dashboards (explained below).

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 Scheme, or details about personal relationships to determine who should receive benefits on your death which could include data concerning your sexual orientation. We may have information about gender reassignment, if you have a gender recognition certificate or have told us that you identify as a different gender from your birth sex. We may also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme 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 have an employment link (as described above) or 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 eligible 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 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. We need to tell you if we collected your data indirectly (i.e. from another person) or if it came from any publicly available sources.

WTW, who also administer the Scheme 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. Usually that won't include your name, but it may include other identifiers and data that is unique to you (see the list of data set out above).

Sometimes the Trustee gets information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another scheme if you have transferred benefits from that scheme; 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 you with your Scheme benefits for dashboards purposes, we may retain that data to help demonstrate how and why we concluded that you are a member entitled to receive information about your benefits on dashboards and to help us administer the Scheme.

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 Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

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 for this reason.

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 Scheme. This includes: paying benefits as they fall due; purchasing insurance contracts; arranging for pensions options and annuities (more details about that below); communicating with you; testing data and getting ready for Pensions Dashboards compliance and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Scheme governance are met (including standards set out in Pensions Regulator guidance).

To achieve this (i.e. all of the reasons for processing set out above), the Trustee may share your personal information with various people as necessary, including (but not limited to): any new trustees or trustee directors; the Scheme employers; the Scheme administrator; the Trustee Advisers; the Scheme Secretary; the Trustee's other professional advisers; consultants; lawyers; investment consultants; auditors; insurers; HMRC; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; 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; and integrated service provider(s) (relevant to pensions dashboards compliance, as described above); the pensions dashboards ecosystem (as described above); non-commercial dashboards and commercial dashboards; and the Money and Pensions Service. In addition, the Trustee may share it with other service providers such as Health Partners who is a provider of occupational health services (see more details below about this). If your benefits are transferred to another scheme, the Trustee will also need to provide the administrators of that scheme 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 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 or information on gender reassignment) without consent, and it will do so where that is necessary to run the Scheme 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 otherwise 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 offences data when administering the Scheme 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 Scheme.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, 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. The Trustee might contact you in relation to additional options too.

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

The Trustee will share your personal data when we purchase the annuity, and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). The Trustee will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Scheme membership ID number; marital status and details about spouse/partner; date of birth; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date. Usually your data would be pseudonymised before insurers and reinsurers see it (i.e. your name would not usually be shared but other unique identifiers about you will be).

Scheme Actuary

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and has a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with his 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 Scheme Actuary for statistical research, but only in a form that no longer identifies you. In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustee has anonymised before sharing with them.

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 your personal information for long enough to make sure that we have enough information to:

- pay any benefits due to or in respect of 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 Scheme.

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 Scheme). If we don't find a match (i.e. if you are not a member of the Scheme), 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 the 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 Scheme administrator's contact details, which are set out below. The Scheme 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 Scheme administrator using the contact details set out below.

Where your information is processed and transferred outside the UK

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 type of transfer happens with your consent.

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 dispute resolution process.

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:

<https://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.

Health Partners, who is a provider of occupational health services, has its own privacy notice for what it does as 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 Health Partners when relevant.

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 Scheme administrator at:

Email: GEAerospace@wtwco.com

Phone: 01737 227566 (lines are open 9am to 5pm, Monday to Friday)

Write to: GE Pensions, Sunderland, SR43 4JU.

If you have concerns about the way we handle your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.