

Dear Member

**Personal data relating to you – UK General Data Protection Regulation and the Data Protection Act 2018**

This notice has been prepared by the Trustee of the AECOM Group Pension Scheme (the “Scheme”) to provide you with information relating to personal data that we hold for you.

The UK's data protection is governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018), which work together to regulate how personal data is processed. The UK GDPR is the post-Brexit version of the EU's GDPR and sets out the core data protection principles and rights for individuals, while the DPA 2018 supplements it by providing specific UK laws on how data should be handled, including exemptions for areas like law enforcement.

**What are the UK GDPR and the DPA 2018?**

These are the key data protection laws in the UK and they have applied since 25 May 2018.

**Our role**

We, as the Trustee of the Scheme, hold certain information about you (“personal data”) related to your membership of the Scheme.

You may have provided some of your personal data directly to us. Other elements of the personal data we hold about you may have been provided to us by your employer or former employer (if you no longer work for AECOM). We may also collect additional personal data from you at certain key points (for example, when you retire and draw any pension that you may be entitled to).

We hold this data in our role as a ‘data controller’. We have appointed Natalie Georgiou, Pensions Manager and Louise Mills, Pensions Project Manager, as our Data Protection Managers. Their contact details are provided at the end of this letter.

As data controller, there are a number of points which we are required to bring to your attention. These relate to the legal basis upon which we are entitled to process your personal data, how long we keep your personal data for, how we use your personal data and your rights.

**Basis for processing**

We process personal data about you for the proper handling of all matters relating to the Scheme, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) We need to process your personal data to satisfy our legal obligations as Trustee of the Scheme;
- b) We need to process your personal data for the legitimate interests of: administering and managing the Scheme and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustee has in relation to the Scheme; and
- c) The processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract (for example you have a contract with a personal pension provider and you ask the Trustee to transfer personal data to that provider).

### **What personal data do we hold?**

The types of personal data we hold and process about you could include:

- Contact details, including name, address, telephone numbers and email address;
- Identifying details, including date of birth, national insurance number and employee and membership numbers;
- Information that is used to calculate and assess eligibility for benefits, for example length of service and salary information;
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details;
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death;
- Information about your health, for example, to assess eligibility for benefits payable on ill health; and
- Information about a criminal conviction if this has resulted in you owing money to your employer or the Scheme and the employer or Scheme may be reimbursed from your benefits.

Where we obtain information concerning certain “special categories” of particularly sensitive data, such as health information, extra protections apply. We will only process such information with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing. However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Scheme, you should bring to the attention of those individuals the information contained in this notice.

### **What do we do with your data?**

As data controller, we use third parties who may process your personal data in order to help us carry out our duties, rights and discretions in relation to the Scheme.

Those third parties currently include the Scheme’s actuary, administrator, legal adviser, auditors, consultants, sponsoring employers, insurers, Additional Voluntary Contribution (AVC) providers, annuity providers and tracing agencies (where we have no known address for a member). If you would like a list of the names of the third parties who currently fulfil these roles, this can be requested by writing to either Natalie Georgiou or Louise Mills.

In certain circumstances, we may also be required to share your personal data with other parties, for example, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund or HM Revenue and Customs. They may then use the personal data to carry out their legal functions.

In some instances advisers and service providers will be data controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they

hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example, via their websites.

The advisers, service providers and organisations referred to above may use personal data to perform their functions as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, the administrators may pass personal data to a printing company for the purpose of a bulk mailing exercise), to the extent they consider the information is reasonably required for a legitimate purpose.

### **How long do we keep your data for?**

We will normally keep your personal data for at least as long as you are a member of the pension scheme.

If you cease to be a member of the pension scheme (for example, if you transfer all of your benefits out of the pension scheme), we will then assess the length of the period for which we need to retain your personal data. As pensions are long term benefits, we retain your personal data for some time after you have ceased to be a member of the pension scheme just in case, for example, there are any queries about your benefits in the future.

We may also need to retain your personal data for a longer period to comply with our legal and regulatory obligations.

### **Transfer of personal data outside of the UK**

In some cases your personal data may be transferred outside the UK to a jurisdiction that may not offer an equivalent level of protection. If this occurs, appropriate safeguards must be implemented with a view to protecting your data in accordance with applicable laws. If you want information about the safeguards that are currently in place this can be requested by writing to either Natalie Georgiou or Louise Mills.

### **Your rights**

We are required to let you know that, in some circumstances, you can request erasure of personal data or a restriction on our processing of it. In addition, you can object to us processing your data, and you also have a right to obtain and reuse your personal data for your own purposes (for example if you wish to check your pension entitlement). Where we are relying on consent to process your data, you also have the right to withdraw that consent.

However, because we need your personal data to be able to calculate and pay your benefits, we do not expect that the sort of requests mentioned in the above paragraph are requests that you will want or need to make. However, if you do, this may affect the payment of benefits from the Scheme. In some cases it could mean the Trustee is unable to put your pension into payment or have to stop your pension (if already in payment).

You have a right to access and obtain a copy of your personal data. If you make such a request, we will respond to it as soon as we can and, in any event, within one month. If, once you review the personal data that we hold, you notice that there are mistakes in any of that data, you can also ask us to rectify that personal data.

You also have the right to lodge a complaint in relation to the way we deal with your data. In the first instance, we would always suggest that you take this up with us first. However, you can also complain directly to the Information Commissioner's Office. The Information Commissioner's Office is the UK's independent body set up to uphold information rights and its contact details can be found on its website: <https://ico.org.uk>. You can also call its helpline on 0303 123 1113.

## Contact details

## Data protection queries

If you would like to contact us about your personal data or have any queries in relation to the information set out above, you can do so directly using the contact details below.

Natalie Georgiou Pensions Manager AECOM Ltd Marlborough Court 10 Bricket Road St Albans Hertfordshire AL1 3JX	Louise Mills Pensions Project Manager AECOM Ltd Marlborough Court 10 Bricket Road St Albans Hertfordshire AL1 3JX
Email: <a href="mailto:Natalie.Georgiou@aecom.com">Natalie.Georgiou@aecom.com</a> Telephone: 07584 425277	Email: <a href="mailto:Louise.Mills@aecom.com">Louise.Mills@aecom.com</a> Telephone: 07818 013380

## Non-data protection queries

For all other enquiries please continue to contact the Trustee's appointed administrator, XPS Administration.

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XPS Group  
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Middlesbrough  
TS1 9JA

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Telephone: 0121 809 2742

Yours faithfully,



Paul Weaver  
Chairman

(for and behalf of the Trustee of the AECOM Group Pension Scheme)