

Mitsubishi Electric UK Retirement Benefits Scheme (the Scheme) - Privacy Notice

Introduction

The Trustees are required to issue a Privacy Notice to all members of the Scheme, in their capacity as a Data Controller of the Scheme, in order to comply with the 'General Data Protection Regulation' ('GDPR'), which came into effect on 25 May 2018 and the Data Protection Act 2018.

The purpose of this Privacy Notice is to fulfil your rights to be informed about the use of your personal data in relation to the Scheme. This is for your information only and you do not need to take any action.

Data Controllers

As the Trustees of the Scheme, we hold certain personal information (known as "personal data") about scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustees in running the Scheme will be personal data (in other words, it is information from which you as an individual can be identified).

In accordance with guidance issued by the Information Commissioner's Office ('ICO') and the Institute and Faculty of Actuaries, along with the Trustees the Scheme Actuary of the Scheme is also considered to be an independent Data Controller (i.e. the holders, users and processors of personal data) for the purposes of the GDPR. The Trustees' ICO registration number is Z5029844.

The Scheme Actuary uses your personal data in order to advise the Trustees of the financial management of the Scheme. This ensures that the Trustees are able to meet their obligations to pay members' benefits and comply with legal requirements.

What information do we collect about you?

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name
- your age and date of birth
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)

- your national insurance number
- information about your benefits under the Scheme, including pensions and death benefits, together with corresponding details of assets, investments and insurance
- your pensionable service
- relevant employment information, such as current and past salary information, pensionable pay, employment dates, length of service, and career history (where relevant)
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender), current relationship status, marital / relationship history
- details about your next of kin and emergency contact information
- medical and other details about your health.

In order to properly administer the Scheme and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant's benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death. We will not collect any personal data that we do not need.

How do we use that information?

The Trustees need to hold and process information about you as it is needed for us to administer the Scheme and to calculate and pay benefits. In legal terms, this means that we have a legitimate interest in processing the information. We also keep the above information in order to allow us to comply with our obligations towards members under the Scheme's governing documents, as well as under relevant legislation. We will not collect any personal data from you that we do not need.

Personal data relating to the Scheme is held on paper and on computer systems. As a "data controller", the Trustees must process this information fairly and lawfully.

As part of running the Scheme, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as "special categories of personal data"). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "special categories of personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

The Scheme Actuary may from time to time use your personal data (on a pseudonymised basis) for actuarial research purposes. This might include, for example, the provision of anonymised personal data to the continuous Mortality Investigation (CMI), which investigates the mortality experience of pension scheme members on behalf of the Institute and Faculty of Actuaries. The Scheme Actuary would not pass your personal data to any other third party without the prior agreement of the Trustees.

Who do we share it with?

We are not allowed to share personal data about you to other organisations and people, unless the law allows us to or you have given your consent. As we need to share information with others in order to provide you with benefits, there is a legitimate interest in the Trustees sharing this information. We may also need to share it in order to meet contractual and other legal obligations.

We share personal data with the following:

- the third parties who are responsible for the day-to-day administration of the Scheme on behalf of the Trustees
- your employer (i.e. the company that employs you while you are or were a member) and other companies in the group
- the Scheme's professional advisers, including the Scheme Actuary, auditor, investment adviser and lawyers
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustees can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) in the UK and/or a payment via Western Union when pensions are being paid overseas
- tracing agencies who assist the Trustees with updating scheme data from time to time

How long do we keep personal data for?

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustees may be required to keep some of your personal information for the rest of your life so that we have the information we need in order to pay benefits and to

answer queries relating to your benefits.

We review the personal data held in relation to the Scheme on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

Your rights

- You have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected
- You can require the Trustees to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- You can object to your personal data being processed, although the Trustees can override this objection in specific instances.
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below)
- You can request that your personal data is deleted altogether.
- You have the right to complain to the Information Commissioner’s Office, or to bring an action before the court, if your personal data rights are not complied with (see “Making a complaint to the Information Commissioner’s Office” below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, the ability for you to build up benefits and our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- make a complaint about how we have handled your personal data

please contact the Trustees of the Scheme via Iain Blazey, Head of IT, Mitsubishi Electric Europe B.V. Travellers Lane, Hatfield, Hertfordshire AL10 8XB.

If you have any questions or concerns on how the Scheme Actuary uses your personal data please contact the Scheme Actuary at Buck, 20 Wood Street, London EC2V 7AF.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

Last updated: May 2021