Imperial London Hotels Limited 1978 Pension & Life Assurance Scheme ("the Scheme")

General Data Protection Regulation – Privacy Notice

This Privacy Notice has been issued by the trustees of the Scheme to comply with the General Data Protection Regulation (GDPR) which came into force on 25 May 2018. The GDPR extended the data protection legislation applying to personal data and it applies to every company and organisation in Europe which collects, stores or uses data about individuals. This document replaces the previous GDPR privacy notices which the trustees have issued.

Why are the trustees writing to you?
Under GDPR, the trustees of the Scheme are a data controller. Data controllers decide how and why your data is used. In some circumstances, other professional advisers may also be considered to be data controllers. The Scheme Actuary, David Simpson of Howden (formerly known as Barnett Waddingham) is a joint data controller. Anyone who collects, stores or uses Personal Data is required to tell the people concerned how their Personal Data is used, the legal justification for using it and what new rights they have. **The Trustees of the Scheme** are Mr A Walduck, Mr S Walduck and Mrs A Duncan ("the Trustees").

What is Personal Data?
In order to manage the Scheme and to pay the correct benefits to members, the Data Controllers are required to hold personal data about you. Personal data means any information which can directly or indirectly identify a person. For the purposes of the Scheme, this includes dates of birth, gender, service and pay (and benefits derived from these), identification (e.g. National Insurance number), marital status, bank account details for the payment of benefits, HMRC tax codes and addresses for members and their dependants. The data was initially obtained from your employer or directly from you.

What about Sensitive Personal Data?
Some types of data are particularly sensitive and are therefore given additional protection under GDPR. This includes anything relating to medical history, sexual orientation, genetic and biometric data. We do not expect to hold Sensitive Personal Data in the normal course of events, but may do so occasionally (for example, when considering eligibility for dependants' benefits). You will be asked for your consent to use this data. You do not have to provide this data and can withdraw consent at any time, but this may mean benefits cannot be paid.

Why do the Trustees need my data?
The Trustees and their advisers need your data in order to (a) maintain accurate records about your membership of the Scheme (b) calculate and pay your benefits from the Scheme (c) undertake risk management exercises (d) comply with legislation and regulations and (e) manage the relationship with the employer. Under GDPR, these are regarded as a "legitimate interest" and are necessary to enable the Trustees to meet their legal obligations under trust law.

Who has access to my data?
Your data will be used primarily by the Scheme's administrator, Albion EBC, previously known as Options EBC Limited, to calculate and administer pensions and other benefits as well as by the Scheme Actuary and Howden to advise the Trustees on the financial management of the Scheme.

From time to time, other organisations will also need access to your data, including the Scheme's auditor and legal adviser. We also have to provide information to HMRC and other third parties where this is required by law. The Scheme's sponsoring employer may also use data about members to assist in running the Scheme. We have also shared your data with Aviva, the insurance company from which the Trustees have purchased a bulk annuity (or buy-in) policy to secure the benefits of members of the Scheme. The Trustees have formal agreements in place with any other organisation with which your data is shared, confirming that your data will only be used for the purposes of the Scheme and will be held securely. A comprehensive list of parties with which data may be shared is set out in the Trustees' formal Data Mapping document.

How long will you keep my data?

Because pensions last such a long time, sometimes with retrospective changes and/or queries arising long after the event, it is necessary to hold personal data for many years. We will therefore retain your data until such time as we no longer need it, but in any event for a minimum of 6 years after all benefits relating to your membership have ceased or as allowed by the GDPR.

What rights do I have?

You already have the right to see your own data held by Data Controller and require that we rectify any errors (which we are of course keen to do). Under certain limited circumstances, you have the right to be forgotten or to have your personal information deleted but without your personal information the administrator would not be able to pay your benefits. If you are unhappy with the way your data has been used you can complain to the Information Commissioner's Office (ICO) at https://ico.org.uk or by writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113. Website: https://ico.org.uk .

Who is responsible for my data?

The Trustees and the Scheme Actuary are data controllers under GDPR and therefore responsible for your data. The administrators and other parties are Data Processors. Both data controllers and data processors have extensive responsibilities under GDPR to make sure that your data is kept securely and only used for the appropriate purposes, as outlined to you in this note.

How do I make a complaint?

If you:

- wish to raise a complaint on how we handle your personal data, you can contact us to have the matter investigated;
- are not satisfied with our response or believe the way we are processing your personal data is not in accordance with the law, you can complain to the Information Commissioner's Office; or
- have concerns about how your personal data is being handled in connection with the Scheme, including its accuracy, use, storage or disclosure, you have the right to raise a data protection complaint with the Trustees. The Trustees operate a Data Protection Complaints Procedure for these matters, which reflects the requirements and timescales under data protection law. The procedure is set out within the Scheme's recently updated Internal Dispute Resolution Procedure. Details of how to raise a data protection complaint can be obtained from the administrator of the Scheme using the contact details provided in this privacy notice. You also have the right to raise your concerns at any time with the Information Commissioner's Office (ICO), the UK regulatory authority responsible for data protection.

What happens next?

The Trustees will review their Data Protection Policy regularly, or following material changes to circumstances, as part of their standard governance process. The joint data controllers can be contacted via, and further details of the privacy practices operated by the Scheme can be obtained from Roger Croxton, Albion EBC, Room B44, Business Box,3 Oswin Road, Braunstone, Leicester, LE3 1HR; Email: roger.croxton@albionebc.com; Telephone: 07716 498110

You do not need to take any action as a result of this notice but please let us know if you have any questions.

The Trustees of the Imperial London Hotels Limited 1978 Pension & Life Assurance Scheme
September 2026