

General Mills UK Pension Plan

Privacy Notice

Personal information and what we do with it

The Trustee of the General Mills UK Pension Plan (the “**Plan**”) needs personal information about you to run the Plan and pay benefits. Similarly, other parties involved in running the Plan 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:

- Willis Towers Watson (who advise the Trustee on actuarial matters relating to the Plan); and
- the individual Scheme Actuary (currently Jacob Sapwell of Willis Towers Watson).

In legal terms, we 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).

The controllers may change this Notice from time to time and we will notify you of any changes the next time we communicate with you.

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment).
- Your sex/gender. We use sex to understand how long you are likely to receive your pension for and gender as part of your addressee details if we write to you e.g. ‘Mr, Mrs, Ms.’).
- Contact details (including your address, phone number and email address).
- If your benefits from the Plan derive from your employment, details of your employer when you were building up benefits in the Plan, how long you worked

for them, your salary from time to time, details of any period of absence and working hours.

- Whether you are married or in a civil partnership, and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Plan form part of a divorce settlement, details of that settlement.
- Any other personal data which may be needed to process your benefits and are needed for the proper running and administration of your pension Plan.
- Details of any contributions paid by you or on your behalf to the Plan, including additional voluntary contributions.
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Plan.
- 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 Plan; and;
- Correspondence that we may have received about you from your appointed independent financial adviser.

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 Plan, or details about personal relationships to determine who should receive benefits on your death. We may have information about gender reassignment, if you have a gender recognition certificate or have told us that you identify with 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 Plan 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 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.

Where we get personal information from

Some of the information the Trustee has comes directly from you. In addition, Link Pension Administration (HS) Limited who administer the Plan on behalf of the Trustee, may have obtained information from you and passed it to the Trustee. The Trustee may then in turn pass information about you to the Trustee Advisers or may instruct the administrators to do so. The Trustee is the source of the personal information which the Trustee Advisers have about you.

Sometimes the Trustee gets information from other sources: for example, from your employer (for information such as your salary and length of service); from another Plan if you have transferred benefits from that Plan; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if we have lost touch with you and are trying to find you. The Trustee may in turn pass this to the Trustee Advisers (as above).

If we ask you for other information in the future (for example, about your health), we 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 Plan's governing documentation and must also meet other legal requirements in relation to the running of the Plan.

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.

The Trustee also has a legitimate interest in properly administering the Plan. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Plan governance are met (including standards set out in Pensions Regulator guidance). The Trustee makes sure that your own interests are not outweighed or prejudiced by our legitimate interests.

In order to achieve this, the Trustee may share your personal information with various people, including: any new trustees or trustee directors; the Plan's employers; the Plan's administrators; the Trustee Advisers; the Trustee's other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; and IT and data storage providers and other service providers, such as printers who help the Trustee prepare communications which it sends to members, and tracking and tracing services. If your benefits are transferred to another Plan, the Trustee will also need to provide the administrators of that Plan with information about you.

When we need to use information about your health, we may ask for your consent. However, sometimes there may be reasons of public interest or 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, or information on gender reassignment) without consent, and we will do so where that is necessary to run the Plan 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 we can do for you, unless we have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, but then you withdraw that consent, we will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes, the Trustee needs to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

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 Plan.

The Plan's employer may also have a legitimate interest in contacting you about your benefits under the Plan, 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 employer so that it can contact you for that purpose.

The Trustee may need to share personal data with insurers in relation to purchasing and pricing up insurance contracts called 'annuities' (unless that can happen based on anonymised data). Insurers will use that data to verify the assets and liabilities of the Plan. The Trustee may write to you before purchasing an annuity to ask for up to date information about your spouse/partner/children/other dependants to this end.

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: Plan membership ID number; marital status and details about spouse/partner; DOB; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement.

Scheme Actuary and actuarial advisors

The Scheme Actuary is appointed by the Trustee to value the Plan benefits and carry out other calculations in relation to your Plan benefits. He 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 for legal reasons, such as courts and law enforcement agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers. When Willis Towers Watson are providing actuarial advice the same position will apply.

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 him.

As noted above, Jacob Sapwell of Willis Towers Watson is the Scheme Actuary and is considered a joint controller collectively with the Trustee of the Plan.

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 any of the 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 we will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Plan and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of up to 75 years from the end of the Plan year in which the last payment from the Plan is made to or in respect of you.

However, some information may be kept for a longer or shorter period depending on how 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.

Your rights in relation to your personal information

You have rights in relation to the personal information we have 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 the Plan's administrator's contact details, which are set out below. We can also supply more information about these rights to you, on request.

The Trustee has agreed with each of 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 administrators, using the details below.

Keeping your information safe

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 (and, if applicable, any recipients have signed up to appropriate certifications and transparency requirements in connection with that adequacy), 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).

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact us via the Plan administrator at: General Mills UK Pension Plan, c/- Link Pension Administration (HS) Limited, 20 Chapel Street, Liverpool, L3 9AG.

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.

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