

## **The Scandinavian Airlines System (Investments) Limited Pension and Assurance Scheme (the "Scheme")**

### **Privacy notice**

#### **Purpose of this notice**

This privacy notice aims to give you information on how the personal data regarding your membership of the Scheme is collected and processed.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

We may update this privacy notice from time to time. We will provide you with a new privacy notice when we make any substantial updates.

#### **Data Controller**

We, the Trustees of the Scandinavian Airlines System (Investments) Limited Pension and Assurance Scheme, will be the "data controller" of the personal information collected and used by the Scheme. This means we are responsible for deciding what personal data about you is required and how it should be protected.

In addition, the Scheme Actuary (Declan Keohane), and our Actuarial Advisers (First Actuarial) act as a joint data controller for the personal data that they use. This privacy notice also covers these joint data controllers.

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

We hold personal data on you to enable us to calculate and pay benefits to you or your dependants. The information will also be used, where necessary, for the financial management of the Scheme.

The information we hold on you includes:

- details of your employment history, including salary information
- personal information including name, maiden name, date of birth, National Insurance number and contact details
- records of any benefits you have transferred into the Scheme from other pension arrangements
- records of any additional contributions you or the employer, on your behalf, have paid into the Scheme
- information on benefits you will receive from the Scheme
- your bank account details (but only from the time we need to start paying benefits to you)

## Why do we hold this information?

We hold this information because we have a legitimate interest in ensuring that you and/or your dependants get the benefits you are entitled to receive, to ensure that the Scheme is well run and has sufficient funds to pay the benefits promised.

We may also use it to comply with our legal obligations, for example in calculating whether the Scheme has enough money to pay future benefits.

We may also hold and use more sensitive data (also known as “special categories of data”) such as health information collected when considering whether to pay any ill-health benefits

We may need this sensitive data if it is necessary for us to pay ill-health benefits to you, or death benefits to the people you have nominated. If we use this data it will be in accordance with our contract with you, and/or because you consent, at the time, to us holding and using this information. You may withdraw that consent at any time, in which case we will erase that sensitive data. However, if we consider that doing this will prevent us from paying the correct benefits to you or your dependants, we will let you know before proceeding.

If you provide us with personal data relating to another person, such as your partner, spouse, civil partner or dependants, you should ensure that the individual is aware that you are sharing their personal data with us and that they are happy for you to do so. You should also share this privacy notice with them and ensure that they are aware that they can request a privacy notice by contacting the Trustees using the contact details below.

The Scheme Actuary and First Actuarial also hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing actuarial advice and valuations for us. For example, the Scheme Actuary carries out calculations to advise us if the Scheme has enough money to pay the future benefits promised to its members.

## Where did we get information about you?

The personal data we hold about you was given to us by:

- **The employer**, who provided us with data such as your salary information, part-time working details, and information on when you joined and left employment.
- **You**, for example, through the forms which you completed when you joined the Scheme. You (or your family members) may also have provided information subsequently when you contacted the Scheme to discuss your benefits, to tell us about a change of address or for other reasons.
- previous pension schemes, where you transferred your benefits into the Scheme. This will include information such as your dates of service, contracted-out benefits (if applicable) and contributions.

## Who do we share information with?

To run the Scheme, your personal information will be used by the Scheme Administrator and our advisers, as necessary (including the Scheme Actuary, actuarial advisers, auditor and legal advisers). We may also need to share your personal information with other parties such as annuity providers, firms providing death-in-service insurance services for the Scheme and tracing agencies (for example, if you move to a new house and don't tell us your new address).

Where we do share information with these parties we remain in control of the data and we will ensure that suitable data protection agreements are in place.

We may transfer your data to separate third parties. These parties are:

- official organisations who we have a legal obligation to provide information to. This includes HMRC and the Pensions Regulator
- insurance companies, for example, if we buy an annuity on your behalf
- other pension schemes, if you ask us to transfer your benefits to a new scheme
- the Employer, or their advisers, to enable them to manage their financial commitment to the Scheme, to produce pension related accounting disclosures and to allow them to answer questions you may have about your benefits or to give you guidance on pension related matters.

We only share information about you where it is necessary for the running of the Scheme. We do not share information about you for any other reason.

### How long do we keep your data?

We will keep information about you for the lifetime of the Scheme. Should we change the administrators or advisers who help us to run the Scheme, we will ensure the previous providers pass your personal data onto the new ones and erase any other copies of your personal information after a suitable period.

The Scheme Actuary and the actuarial advisers also keep a copy of the information. Should we change our Scheme Actuary or actuarial advisers, the existing provider will keep a copy of the data for a minimum of one year and a maximum of seven years.

### Your rights

You may ask for a copy of the information we hold on you. You may make this request by contacting us.

If, at any point, you believe the information we hold on you is wrong, you can ask us to correct it.

In some circumstances, you may also have a right to ask us to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline (0303 123 1113).

If you wish to raise a complaint on how we handle your personal data, you can contact us, to have the matter investigated. If you 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.

### Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Scheme so that we can continue to pay you benefits when due, and contact you about your membership of the Scheme. In particular, please let us know if you move home, so that we can stay in touch with you.

## Contacting us

You may contact us for further details on how we use your personal information, or with any other questions about this privacy notice, including any requests to exercise your rights, via the Scheme Administrator or the Trustees whose contact details are:

Contact addresses for Administrator and Trustees:

- Administrator of the Scandinavian Airlines System (Investments) Limited Pension and Assurance Scheme – Email: [basingstoke.admin@firstactuarial.co.uk](mailto:basingstoke.admin@firstactuarial.co.uk); Telephone: 01256 297700
- Trustees of the Scandinavian Airlines System (Investments) Limited Pension and Assurance Scheme – Ylva Zachrisson, [Ylva.Zachrisson@sas.se](mailto:Ylva.Zachrisson@sas.se)