

Abbey Life Trust Securities Limited

Registered Office
1 Wythall Green Way
Wythall
Birmingham
B47 6WG



Abbey Life Assurance Company Limited Staff Pension Scheme

Fair Processing Notice

This privacy notice has been issued by Abbey Life Trust Securities Limited as trustee of the Abbey Life Assurance Company Limited Staff Pension Scheme (the “**Trustee**”, “**we**”, “**our**” or “**us**”).

This notice applies to past and present members of the Abbey Life Assurance Company Limited Staff Pension Scheme (the “**Scheme**”) as well as members’ beneficiaries, dependants and next of kin (“**you**” or “**your**”).

The Trustee is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on the personal information about you the Scheme collects, what we do with this information, the lawful bases on which personal information is processed and the rights you have.

Additionally, at the bottom of this notice, there is some information about the professional actuarial team which advises the Trustee (the “**Scheme Actuary**”)’s separate activities in relation to the Scheme, together with their contact details.

In accordance with guidance issued by the Information Commissioner’s Office (“ICO”), the Trustee is considered a “data controller” for the purposes of the UK GDPR. If you have any questions, the Trustee can be contacted using the following details:

Abbey Life Trust Securities Limited
1 Wythall Green Way
Wythall
Birmingham
B47 6WG

E-mail: abbeylifepensions@equiniti.com

1) Collection of your information

We collect and process the following information about you:

- a) **your personal details:** such as your name, gender, date of birth, home address (including postcode), telephone number, e-mail address, national insurance number, bank account details (in some cases), marital status, dependants and country of residence;
- b) **information relating to your benefits:** such as your member identifying number (which is assigned to you by the Scheme), your employer name, your employment history, the date you joined and (if applicable) left the Scheme, your membership status (deferred or pensioner), your earnings, the category and value of benefits that you have built up or receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments that may occur when you join, leave or retire from the Scheme or when you die;
- c) **records of our communications with you**, including records of any complaints; and

- d) **in some cases, special categories of personal data:** such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you or affect your retirement age) and any criminal offences (e.g., in cases where the Trustee needs to consider exercising its forfeiture powers under the Scheme Rules, or where the Trustee is asked to comply with a court order made under the Proceeds of Crime Act 2002).

Where applicable, we also collect information about nominated beneficiaries, dependants or next of kin (for example, when you submit an expression of wish form). Before providing us with any such information, you should provide a copy of the information in this notice to those individuals. We assume that you have the right to share any personal information you provide to us about them.

In some cases, we will collect personal information about you indirectly from: (i) your (current or former) Scheme employer in the Phoenix group of companies; (ii) the Scheme administrator, which is EQ at present; (iii) other pension schemes (if you have transferred benefits from them); (iv) government departments (e.g., HMRC or the DWP); (v) publicly accessible sources (e.g., the electoral roll); (vi) pensions dashboards; or (vii) through member login on the Scheme website.

2) How we use your information

We use your information for the following purposes:

- a) **communicating with you** in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your (or your duly authorised representative's) request such as in relation to transfers to other pension schemes;
- b) **for general administration and management of the Scheme and its assets**, such as: day-to-day administration and supervision of the running of the Scheme; for communicating with Scheme service providers; to enable communication between the board of Trustee, and between the Trustee and the Phoenix group of companies; to record and pay benefits (including implementing benefit options you have selected); for obtaining actuarial valuations and calculations; for electing member nominated trustee directors; for providing you with news about the Scheme; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud;
- c) **for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime**, for example by making disclosures to tax or social security authorities and regulators, performing anti-money laundering checks, and sharing personal information with pensions dashboards;
- d) **testing and upgrading of systems (where anonymised data cannot be used)**, to improve our processes and our use of technology, develop solutions for access to historical data, and to learn about other processes we can use to improve the administration of the Scheme; and
- e) **when we undertake or agree to undertake activities from time to time to help us manage the liabilities of the Scheme**, such as longevity hedging, insuring Scheme liabilities with an insurer, scheme mergers, bulk transfers, pension increase exchanges, flexible retirement options and enhanced transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

3) Legal Basis for Processing

Depending on the purpose of the processing activity described in section 2 (How we use your information), our use of your personal information as described above is permitted by applicable data protection law because it is:

- a) necessary for our legitimate interests, without unduly affecting your interests or fundamental rights or freedoms. Our legitimate interests include in pursuing the purposes set out in Section 2 above, provided in each case that such interests are not overridden by your privacy interests;

- b) required to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below or to comply with our legal obligations in relation to pensions dashboards;
- c) in some cases, necessary for the performance of a task carried out in the public interest;
- d) when we use certain special categories of personal data (e.g. criminal offence information or relationship information), necessary for establishing, exercising or defending legal claims, or where the processing relates to personal data manifestly in the public domain; or
- e) in limited circumstances, processed with your consent (e.g. health information) which we obtain from you from time to time, such as when you ask us to make disclosures or direct us to make benefit payments or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect or continue to use this personal data we may be unable to administer, record, calculate or pay your or your beneficiaries' benefits (in which case we will inform you accordingly).

4) Disclosures of your information

We may share your information with the following recipients:

- a) our suppliers, such as our administrators (EQ at present), and other providers of services to us and them including the Scheme Actuary, investment advisers, Trustee Secretariat, governance advisers, legal advisers, Scheme auditors, annuity providers, banks, printing, communication, scanning, IT and hosting, marketing, and tracing services providers, as well as financial advisers (to provide you with financial advice), payroll providers (to record and pay benefits) and additional voluntary contribution (AVC) providers. When we share information with these recipients, we take steps to ensure they meet our data security standards, so that your personal data remains secure;
- b) your (current or former) Scheme employer in the Phoenix group of companies where necessary for our legitimate interests in pursuing the Scheme liability management purposes referred to in section 2 above;
- c) insurance and reinsurance companies, such as when we carry out the Scheme liability management activities referred to in section 2 above;
- d) PricewaterhouseCoopers LLP (PwC) and subsidiaries as Scheme auditor to meet regulatory requirements as described in section 2(c) above;
- e) any new pension provider you select if requested by you to do so;
- f) public authorities, regulators or government bodies (such as HMRC or the Pensions Regulator), including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- g) other persons (such as the Pensions Regulator or the Pensions Ombudsman) from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

5) Transfers of your information abroad

The use and disclosure of your information for the purpose referred to in Section 3 above may involve transferring your information to countries outside of the UK and the European Economic Area. Those countries currently include the US, India and the Philippines.

If you live or work outside of the UK or the EEA, we may need to transfer your personal information outside of the UK or the EEA to respond to any queries that you may have. If this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected in compliance with applicable data protection rules.

To ensure an appropriate level of protection, we would typically use a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission and/or the Information Commissioner's Office (ICO) in the UK. Further details of these transfers and copies of these agreements are available from us on request.

6) Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our record retention policy. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests. In general, we will keep your information for 12 years after your benefit entitlement under the Scheme has ceased.

7) Your rights

You have a right to ask the Trustee to rectify inaccurate personal information we collect and process and the right to request restriction of the processing of your personal information pending such a request being considered.

To the extent the use of your information is based on your consent, you have the right to withdraw your consent. Please note that the withdrawal of consent will not affect processing that was carried out before your withdrawal of consent.

You also have the right to ask the Trustee to stop processing your personal data, or to request deletion of your personal data (known as the 'right to be forgotten') – these rights are not absolute (as sometimes there may be overriding interests that require the processing to continue, for example), but we will consider your request and respond to you with the outcome.

If the Trustee processes your personal information on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to request your personal information be transferred to you or to another controller (known as the 'data portability' right). You also have the right to ask us for a copy of some or all of the personal information we collect and process about you.

7) Exercising your rights, and complaints

If you have any questions or wish to exercise any of the above rights, you may send an email to abbeylifepensions@equiniti.com. We are committed to keeping your personal information accurate and up to date. Therefore, if your personal information changes, please contact us using this e-mail address, to let us know.

You can also use this e-mail address if you wish to make a complaint about how we process your information.

If you are not satisfied with any aspect of the processing of your personal information by the Trustee, we would like to discuss it with you, to understand how we can fix the issue. If you are not satisfied with our response however, you can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office (www.ico.org.uk) or, if you are no longer resident in the UK, the relevant data protection authority in your country of residence.

8) Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

9) Further information from Aon

Important note – The Scheme Actuary, Aon Solutions UK Limited, is also a ‘data controller’ in relation to the information it processes as part of its activities. Therefore, it is also required to prepare its own privacy notice. A summary of the Scheme Actuary’s full notice is set out below. It also tells you how you can obtain a copy of Aon’s full privacy notice.

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the Scheme. In doing so, Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services.

The purposes for which Aon uses personal information will include management of the Scheme and your membership within it, funding the Scheme (i.e. helping to ensure that the funds within the Scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), Scheme actuary duties (which include assessing individuals who are members of the Scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the Scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

Aon may pass your personal information to third parties such as financial advisors and benefits providers, insurers, Aon’s affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place, as further described in Aon’s full Privacy Notice.

More detail about Aon’s use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice, which is available online at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH

10) Status of this privacy notice

This privacy notice was last updated on **11 September 2025**.

It is a notice explaining what the Scheme does, rather than a document that binds the Trustee contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you, such as through our newsletter.

**Abbey Life Trust Securities Limited
as the Trustee of the Abbey Life Assurance Company Limited Staff Pension Scheme**