



## Data privacy statement

The Trustees are committed to protecting and respecting your privacy and rights. This Privacy Statement ('Statement') gives you information about how the Trustees will collect and use personal data about you, the circumstances in which they may share or otherwise use the personal data and to whom they may disclose this personal data.

The Trustees are data controllers in respect of the personal data they collect about you for the purposes of data protection legislation (by which we mean the current UK Data Protection Act 1998 and the EU General Data Protection Regulation (EU Regulation 2016/679) which comes into effect on 25 May 2018). The Trustees' address is Shell Centre, London SE1 7NA.

### Information the Trustees may collect from you

The Trustees will collect and process personal data which you provide to them in connection with the Scheme. This may include data about your age, date of birth, gender and marital status. Also included may be your length of employment with the Shell Group and details of your dependants and other persons in your household, and your contact details (e.g. residential address, email address and telephone number).

### Information the Trustees may collect about you from the Shell Group or third parties

The Trustees may collect personal data about you from the Shell Group or third parties. This may include information relating to your employment, your salary and your benefits, to the extent relevant to your pension and related arrangements. Periodically, the Trustees will collect personal data relating to you from third parties such as former employers or regulatory authorities.

### Purposes for which and the basis upon which the Trustees will process your personal data

The Trustees will process your personal data and the personal data of other persons (e.g. your dependants) provided by you to us in connection with the administration of benefits of your pension and related benefit entitlements arising as a result of your employment with the Shell Group.

Generally, the Trustees will rely upon the 'legitimate interests' ground as the legal basis for processing your personal data. This means that the Trustees will process personal data for the legitimate interests of themselves or a third party to whom they may disclose personal data in accordance with this Statement. The legitimate interests being the administration of the Scheme (provided always that the legitimate interests are not overridden by the interests, fundamental rights or freedoms of Scheme members (or others) which may require protection of personal data).

Where the Trustees are required to process sensitive personal data (which is defined in the data protection legislation and which includes ill-health information), they may approach you or the relevant individuals for specific consent to the processing of such data.

### Storage of personal data

The Trustees will hold personal data of Scheme members and their dependants for as long as may be necessary in order to administer benefit entitlements and for the purposes of maintaining records of steps the Trustees have taken to comply with their obligations under the Scheme. Inevitably, this means that personal data may be retained by the Trustees for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased.

### Disclosure of personal data

In the course of administering the Scheme, the Trustees will engage pensions administration service providers, tracing agencies, a scheme actuary, lawyers and accountants and similar external advisers to assist them. The Trustees may disclose your personal data to these third parties in connection with services provided by the third parties to the Trustees. At all times, the Trustees will ensure that the personal data is processed in accordance with their instructions and in circumstances which require the recipient to observe industry standard security measures in respect of the personal data.

The Trustees may also disclose your personal information to third parties in the following types of situations:

- in the event that they wish to enter a buy-out/buy-in of any of the benefits under the Scheme, in which case they may disclose your personal data to the prospective counterparty to such a transaction; or
- if they are under a duty to disclose or share your personal data in order to comply with any legal obligation.

### International transfers of personal data

As required by data protection legislation, the Trustees have strict security procedures regarding the storage and disclosure of personal data. The personal data that they collect about you may be transferred to and stored at one or more countries outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for the Trustees or for our third parties. In such cases, the Trustees will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under the EU General Data Protection Regulation and as described in this Statement.

If the Trustees cannot ensure such an adequate level of data protection, your personal data will only be transferred outside the EEA if you have given your prior consent to such transfer.

### **Your rights under the EU General Data Protection Regulation**

You have rights under the EU General Data Protection Regulation, including the right to access the personal data the Trustees hold about you and to rectify or erase such personal data. You may address your requests to the BG Pension Scheme Secretary, Shell Centre, London SE1 7NA.

### **Changes to this Statement**

The Trustees reserve the right to change this Statement and any other relevant policies or procedures at any time without notice to you. Any changes we may make to this Statement in the future will be notified to you and you are advised to regularly check and review the Statement to ensure you understand how we may be processing your personal data. Any changes the Trustees may make to this Statement (which will, unless otherwise indicated, apply to any personal data already obtained by the Trustees before the changes were made) will be effective from the date on which those changes have been notified to you. Where appropriate, they may also notify you of any changes made by email.

### **Data Protection**

The Trustees will not disclose or transfer personal data to third parties for the purposes of marketing.

### **Contact**

If you have any questions concerning this Statement or the policies or procedures referred to within it, please contact the BG Pension Scheme Secretary at Shell Centre, London SE1 7NA.

Where you are dissatisfied with any aspect of our handling of your personal data, you have a right to lodge a complaint with the Information Commissioner's Office. Their contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 or 01625 545 745

Fax: 01625 524 510

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)