



## PRIVACY NOTICE FOR MEMBERS (AND THEIR DEPENDANTS) OF THE UK SHELL PENSION PLAN (the “Scheme”)

### What does the Privacy Notice cover?

As the Trustee of the Scheme we are committed to protecting your personal data. This statement explains how we do that. It sets out what we do with your personal data, how we protect it, and explains your privacy rights.

### Who are we

We, as the Trustee are responsible for the running of the Scheme which means administering the accrual and payment of your benefits. To assist us in this regard we have appointed FIL Life Insurance Limited (Fidelity) as the administrator of the Scheme and our data processor for the handling of your personal data.

Fidelity is part of the Fidelity International Group (Fidelity Group). You can find out more about Fidelity at <https://retirement.fidelity.co.uk/en/> . The Fidelity Group operates in many countries, the main countries for the purposes of the Scheme are the United Kingdom, Ireland and India.

Fidelity can be contacted using the contact details on page 5.

As well as this Trustee Privacy Notice for the Members of the Scheme (and their Dependants), the Shell Group of Companies has privacy policies which explain how Shell process personal data in relation to specific HR processes (such as Recruitment, Shell People, Open Resourcing, OneHealth IT and International Mobility programs) as well as local privacy policies among the countries in which Shell operates to reflect local practices and legal requirements.

### Your Personal Data

As Trustee of the Scheme, we need to hold certain personal information (known as “personal data”) about members of the Scheme and, where applicable, their dependants and beneficiaries.

Fidelity, on our behalf, collect and use your personal data to enable us to run the Scheme and to comply with the law.

### Why we collect it

The law requires us to tell you why we collect and use your personal data – this is known as the lawful basis for processing. The basis we rely upon will depend on the purposes for which we are processing your personal data. These are detailed below:

#### 1. Our Legitimate Interests

We, and Fidelity on our behalf, process your information for the following reasons, which we define as our **legitimate interests**:

- providing and administering the Scheme for you,

- to enable the conduct of security operations, such as using your IP address to help identify you when you log in to PlanViewer
- identifying you when you contact us;
- to increase member engagement, for example to encourage members to be more aware of their holistic financial needs;
- helping us with our internal research and analysis; and
- developing new services and products.

Fidelity may also process your information pursuant to its legitimate interests:

- to help with its internal research and analysis;
- to develop new services and products; and
- to enable a consistent and integrated service to you, if you hold multiple accounts with Fidelity.

## 2. Our Legal Obligations

In some circumstances, we and/or Fidelity on our behalf, have a **legal obligation** to process and share your personal data. We and/or Fidelity on our behalf must provide a wide range of data to regulators or other entities in order to prevent or detect crime. Sometimes this involves personal data. We or Fidelity will never transfer more personal data than is necessary to discharge our legal obligations.

## 3. Your Consent

Fidelity will ask you for your preferences in terms of how you would like them to communicate with you and what information you would like to receive. You can always adjust your communications preferences, and can opt not to receive information from Fidelity unless they are obliged to provide it.

### What we collect and how

The personal data you provide to us will include combinations of any of the following: Your name, email address, telephone number, address, identification numbers such as social security number, banking account details, date of birth, voice biometrics & voice recordings, location information, employment information, gender, IP address, language, and marital status, dependants and beneficiaries.

This information is typically provided by your employer or by you throughout the course of your relationship with us. We hold your personal information relating to the Scheme on paper and on computer systems.

As part of running the Scheme, from time to time we, and Fidelity on our behalf, may also need to hold and process sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). Under legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. If we need your consent to process or pass your sensitive personal data to a third party, we will ask you to provide it at the relevant time. This may depend on the circumstances and the stage of your membership. In the event of an ill health case, the Trustee will

only hold any medical evidence while making a decision. All medical evidence will be deleted once a decision has been made.

### **Who we share your personal data with**

Like most businesses, Fidelity uses third parties, including other entities in the Fidelity Group, to help deliver its services. This will often involve a third party processing your personal data but that will only be in line with the purposes set out above. Fidelity, on our behalf, operates a regular and strict regime of third-party checks on how your personal data is protected.

Your personal data will be held in confidence by us and Fidelity but may be passed to other companies as detailed below:

- to Fidelity Group companies or their agents in order to administer the Scheme and carry out our legitimate interests, which may include the transfer of your information outside the EEA;
- we, Fidelity, or other Fidelity Group companies, are provided with updated address details or other information by either you or your employer, in which case we will update the information kept for any other schemes of which you are a member and for which we hold records on our database;
- to the Scheme's professional advisers, including the Scheme actuary, auditor, investment adviser and lawyers. Aon Hewitt, who provide actuarial services and investment advice to the Trustee, are also a data controller in relation to the data they process on the Trustee's behalf. You can read their short-form Privacy Notice in Appendix A.
- to any third parties who we appoint to be responsible for the day-to-day administration of the Scheme on our behalf;
- to HM Revenue & Customs, the Financial Conduct Authority and other statutory bodies (such as the Financial Ombudsman, The Pensions Ombudsman and The Pensions Regulator) – we can be fined and subject to other action if we fail to provide certain information to these authorities;
- to the advisers, printers or other third-party service providers to Fidelity who help to prepare the various communications and information sent to you, such as the annual benefit statement;
- to companies who facilitate payments to you, for example tracing agents, and to allow regulatory money laundering checks to be made and BACS and Western Union payments to be made;
- to a financial adviser who is acting on your behalf.
- to Fidelity's affiliated and associated companies for marketing purposes where you have provided your specific consent;
- at your request only, to other Fidelity Group companies in order to provide improved servicing of the accounts you hold with Fidelity Group, including reporting to you;

- to a benefits consultant or third-party service provider engaged by us or Fidelity to allow improved servicing of your pension account and to help manage our, and Fidelity's relationship with you and assist with any internal research and analysis in relation to the same; and
- to a qualifying pensions dashboards provider or the Money and Pensions Service to ensure your up to date information is available to be requested via a dashboard service.

We may also provide some of your personal information to Scheme employer group companies to help them to make decisions relevant to their role as sponsoring employers. We will only do so to the extent we consider necessary for these purposes.

Any transfer of information will usually be by electronic means, including the internet.

### **Transferring your personal data to other countries**

In today's global market, it is necessary to transfer your personal data across national borders. These transfers may involve at least one of Fidelity's Group entities operating in the EEA and as such will apply the European standard of protections to the personal data we process. In practice, this means that all the entities in the Fidelity Group agree to process your personal data in line with high global standards. Where your personal data is transferred within the Fidelity Group but outside of the EEA, that data subsequently receives the same degree of protection as it would in the EEA.

Where it is necessary to transfer personal data to a third party, stringent reviews of those with whom we share the data are carried out and that data will only be transferred in line with the purpose for which it was collected. The third parties who help us process your data are located in the following countries: the United Kingdom, Ireland and India.

### **Security of Your Personal Data**

Ensuring the confidentiality, integrity and availability of your personal data defines our approach to information security. We ensure that the security risks to your personal data are managed in a way that makes sure we, and Fidelity, meet our legal and regulatory obligations. We ensure that Fidelity produces, maintains and regularly test their business continuity plans. Fidelity utilises the internationally recognised information security best practices, ISO27001 and PCI-DSS. Their Information Security Policy & Standards are regularly reviewed, adhered to and tested for compliance. Information Security training is mandatory for all staff and breaches of information security, actual or suspected, are reported and investigated.

### **Your Rights**

UK law places robust obligations on entities in the protection of personal data. The way we protect your personal data reflects our UK obligations. A number of rights in relation to the use of your personal information empowers you to make certain requests of us, detailed as follows:

## **1. Requesting a copy of your personal data**

You can access the personal data we/Fidelity hold about you and exercise your right to have a copy provided to you, or someone else on your behalf, in a digital format by emailing or writing to Fidelity using the contact details at the end of this Statement.

## **2. Letting us know if your personal data is incorrect**

If you think any of the personal data we/Fidelity hold about you is wrong please let Fidelity know by contacting your local client services team. Fidelity will check the accuracy of the information and take steps to correct it if necessary.

## **3. Asking us to stop using or to erase your personal data**

You have the right to object to our use of your personal data. You can ask us to delete it, to restrict its use, or to object to our use of your personal data for certain purposes such as marketing. If you would like us to stop using your data in any way, please get in touch. Of course, if we are still providing services to you we will need to continue using your information to deliver those services. In some circumstances we are obligated to keep processing your information for a set period of time or indefinitely.

Information will generally be provided to you free of charge, although we can charge a reasonable fee in certain circumstances.

### **How long do we keep your personal data?**

We, and Fidelity on our behalf, must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal information for a minimum of 6 years. However, given the nature of pension schemes, we need to keep some of your personal information for the rest of your life.

### **How to complain**

The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact the Scheme Secretary at the following address: [SI-UKSPP-Trustee@shell.com](mailto:SI-UKSPP-Trustee@shell.com) or [Amanda.J.Burston@shell.com](mailto:Amanda.J.Burston@shell.com).

If you are unhappy with how Fidelity has used your personal data you can complain by contacting Fidelity at:

UK Data Protection Officer, Fidelity International, Beech Gate, Millfield Lane, Surrey KT20 6RP.

Or you can simply call the Pensions Service Centre on 0800 3 68 68 68 or email Fidelity on [pensions.service@fil.com](mailto:pensions.service@fil.com).

Finally, you also have the right to complain to your national data protection authority: Information Commissioner's Office whose helpline number is: 0303 123 1113.

### **Changes to this Privacy Policy**

This Privacy Policy may be changed over time. This Privacy Policy was last updated in June 2023. Updates are effective from the date on which they are notified to Members/put on PlanViewer.

**Aon Solutions UK Limited "SHORT FORM" PRIVACY NOTICE**

Aon Solutions UK Limited ("Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension 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 we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension 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 pension 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 pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our 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.

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://aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp>, or you can request a copy by contacting contact us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH