



## SUPPLEMENTARY PRIVACY STATEMENT

### TRUSTEE OF THE SHELL INTERNATIONAL PENSION FUND (THE 'SCHEME')

#### What does this Supplementary Privacy Statement cover?

This statement provides information to members of the Scheme and their dependants regarding their personal data processed by Shell Trust (Bermuda) Limited as the trustee of the Scheme (the 'Trustee').

This Statement is supplemental to the Privacy Notice for Shell Group Employees, Contractors and Dependents: Current or former Shell employee, contractor or dependent | Shell UK (the 'Privacy Notice').

#### What Personal Data do we gather?

In addition to the personal data set out in the Privacy Notice referred to above we hold or will collect personal information about you in the following categories:

- personal details including your date of birth, marriage/civil partnership status and dependants' details;
- details about who you would like us to consider paying benefits to if you die;
- your choice of additional voluntary contributions fund (if any) to be paid into;
- audio recordings of your telephone calls with the Scheme's administration team (recordings will be held for one year); and
- pension identifiers for pensions dashboards.

If you receive an incapacity pension from the Scheme, we do not hold your medical records. We only hold confirmation from your former employer of the benefits you have been granted and the date of any review of your pension.

#### What do we use your personal data for?

In addition to the purposes set out in the Privacy Notice referred to above, the Trustee uses your personal data to:

- identify you and your dependants to ensure your details are up to date and to communicate with you;
- calculate and pay benefits; and

- make Trustee decisions – such as how to distribute benefits after your death.

### **Why do we process your personal data?**

In addition to the lawful bases set out in the Privacy Notice referred to above, the lawful bases for processing your personal data include:

- to meet our legal obligations (including any contractual obligations), which includes making sure that your benefits are paid correctly;
- to fulfil our legitimate interests in administering the Scheme correctly and effectively; and
- because using the information is necessary in relation to a legal claim.

Please note that as a general principle, the Trustee does not seek nor rely on the consent of members or their dependents for processing their personal data. However, there are limited circumstances when consent may be required. If that is the case, we will ask for it. In those cases where processing is based on consent, you have the right to withdraw your consent at any time. This will not affect the validity of the processing prior to the withdrawal of consent.

### **What are the sources of the personal data?**

You directly, personal data provided by your employer or former employer and information we get from other sources, including UK government sources such as HMRC and the Department for Work and Pensions. Some of your personal data may be collected indirectly through the pensions dashboards ecosystem (including the pension finder service).

### **How long do we hold the personal data for?**

All information, including personal data, is managed in line with the Shell group standards for Information and Records Management and securely deleted once no longer required for a legitimate business purpose or for a legal/regulatory purpose.

Information relating to retirement benefits is held for no longer than 99 years from the commencement of employment but it may be held for (a) a longer period of time where there is a legal or regulatory reason to do so (in which case it will be deleted once no longer required for the legal or regulatory purpose) or (b) a shorter period where you object to the processing of the personal data and there is no longer a legitimate business purpose to retain it.

## Who will we share the personal data with?

In addition to the categories set out in the Privacy Notice referred to above we may specifically share personal data with:

- the Scheme's administrators, our professional advisers (such as the scheme actuary) and third-party service providers to facilitate the administration of the Scheme and your benefits;
- tax authorities and other government organisations; and
- insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes.

The Trustee is the "data controller" responsible for the collection and use of your personal information. We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.

Aon, which provides actuarial services to the Scheme, is also a data controller in relation to the data it processes on the Trustee's behalf. You can read Aon's short-form privacy notice in the Appendix.

Please refer to the Privacy Notice for your rights in relation to your personal data and contact details for queries and complaints.

Both the Privacy Notice and this Supplementary Privacy Statement may be updated from time to time. This Supplementary Privacy Statement was last updated in April 2026.

## Appendix

### Aon Solutions UK Limited "SHORT FORM" 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 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 [Aon Solutions UK Limited Privacy Notice](#), 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.