



## PRIVACY POLICY FOR MEMBERS (AND THEIR DEPENDANTS) OF THE SHELL OVERSEAS CONTRIBUTORY PENSION FUND (the "Scheme")

### WHAT DOES THIS PRIVACY POLICY COVER?

This Trustee Privacy Policy for Members of the Scheme (and their Dependants) provides information about personal data which is processed by or on behalf of the Trustee of the Scheme.

This Privacy Policy explains **what** personal data is processed, for **which purposes**, **how long** we hold the personal data for, how to **access** and **update** your personal data and where to go for further **information**.

As well as this Trustee Privacy Policy for the Members of the Scheme (and their Dependants), the Shell Group of Companies have 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.

This Trustee Privacy Policy for the Members of the Scheme (and their Dependants) is subject at all times to applicable law.

### WHAT PERSONAL DATA DO WE USE?

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Scheme's employers and information we get from other sources, including official databases (for example, HMRC and Department of Work and Pensions).

#### What information may we collect directly from you?

The categories of personal information that we collect directly from you may include:

- personal details (for example, your name, date of birth, marriage/civil partnership status dependants);
- your bank details and national insurance number;
- your contact details (for example, your address, phone number and email address);
- who you would like us to consider paying benefits to if you die.
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#### What information may we collect from other sources (such as your employer)?

These are examples of categories of information we may collect from other sources:

- personal details (for example, your name, date of birth);
- your contact details (for example, your address, phone number and email address);
- information necessary to calculate and pay your contributions or benefits (for example, your employment history, salary).

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

## **HOW THE TRUSTEE USES THE PERSONAL DATA OF MEMBERS AND THEIR DEPENDANTS**

The ways we use your information include:

- identifying you and your Dependants and making sure your details are up to date;
- communicating with you;
- calculating and paying your benefits;
- making trustee decisions – such as how to distribute benefits after your death;

We must have a legal reason to use your personal information. This will usually be one of the following:

- 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;
- because using the information is necessary in relation to a legal claim.

There may be circumstances where we as Trustee need your consent to process your data. If we do, we will ask you for it. If this has happened then you may take back your consent at any time by contacting the trustee or the Privacy Officer at the following address: [Pablo.Gamero@shell.com](mailto:Pablo.Gamero@shell.com)

In those cases where processing is based on consent, and subject to applicable local law which provides otherwise, 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.

## **WHO WILL WE SHARE THE PERSONAL DATA WITH?**

We may share personal information with:

- the Scheme's administrators and our advisers (such as the scheme actuary) to facilitate the administration of the Scheme and your benefits;
- tax authorities and other Government organisations;
- 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.

We may also provide some of your personal information to Scheme employer group companies (and their advisers) 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.

Aon Hewitt, who provide actuarial services to the Scheme, are also a data controller in relation to the data they process on the Trustees' behalf. You can read their short-form Privacy Notice in Appendix A.

## **TRANSFERS OF PERSONAL DATA**

We do not currently transfer to, store or process your personal information in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law. Where your personal information is to be transferred outside the UK (for example by the administrator) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

## **SECURITY OF YOUR PERSONAL DATA**

We have implemented technology and policies with the objective of protecting your privacy from unauthorised access and improper use and will update these measures as new technology becomes available, as appropriate.

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

## **HOW LONG DO WE HOLD THE PERSONAL DATA FOR?**

We will keep your personal information for as long as we have a relationship with you or your Dependants. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

## **HOW CAN I ACCESS MY PERSONAL DATA?**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us.

## **WHO CAN I CONTACT FOR MORE INFORMATION?**

The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact at the following address: [Pablo.Gamero@shell.com](mailto:Pablo.Gamero@shell.com) – the Privacy Officer.

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.

## **CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be changed over time. This Privacy Policy was last updated on 17 September 2020. Updates are effective from the date on which they are notified to Members/put on our website.

**Aon Hewitt Limited "QUICK READ" PRIVACY NOTICE**

Aon Hewitt 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 Aon 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.

Aon 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 the full Privacy Notice which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp> , or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.