

Welcome to your new privacy notice

As the Trustee of the Plan it's our job to make sure we can pay you the benefits you're owed.

To do that, we need to collect and hold onto some personal information both about you and about anyone you want us to consider paying benefits to when you die.

The information we ask for can be anything from basic admin details, like who you are and how you want us to get in touch with you, to bigger things, like how you want your money to be invested, and who you want to receive any benefits when you die.

We want to make sure you know exactly why we might ask for a piece of information, how we look after it, and how having it helps us run the Plan for you. So we've created a new privacy notice. You'll find a copy enclosed with this letter. It tells you:

- what information we collect about you;
- how we use that information;
- who we share it with;
- how long we keep personal data for; and
- what your rights are.

Please read the notice and keep it safe. If you'd like to talk to us about it or ask a question, please get in touch with the secretary to the Trustee, sjenner@rosstrustees.com

Yours sincerely,

A handwritten signature in black ink that reads "Steven Ross". The signature is written in a cursive, slightly slanted style.

Steven Ross

On behalf of the Trustee for the BBA Income & Protection Plan

Who we are

As the Trustee of the BBA Income and Protection Plan (the “Plan”), we hold information about scheme members and their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Plan will be what is known as personal data (information from which you as an individual can be identified. This will be subject to legal protections).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which any personal data we hold is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your address, email address and telephone number
- your national insurance number
- your marital status
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries
- medical and other details about your health
- your Plan salary
- your Plan Employment history
- information on the value of your benefits under the Plan
- Other information as we may require from time to time to appropriately administer your benefits within the Plan

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you so that we can properly administer the Plan and calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Plan governing documents, as well as under relevant legislation. We will not collect any personal data from you that we do not need.

Personal data relating to the Plan is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

As part of running the Plan, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “sensitive personal data”). For this purpose, 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 allowed by the law, this information cannot be processed or passed to a third party without your explicit consent.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or

- where you have given your consent.

However, as the Trustee needs help from various advisers to properly administer the Plan, we share personal data with the following:

- BBA Aviation PLC including group companies which are based outside the EEA. Where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure
- the Plan's professional advisers, including the Plan actuary, auditor, medical advisers, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Plan on behalf of the Trustee
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities
- the advisers and printers who help us prepare various communications we send to you, such as the newsletters
- tracing and identity verification agencies
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- depending upon how we pay pensions, the personal data we have to supply in order to effect a pension payment in the UK and/or a overseas payment.

How long we keep personal data for

We 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 data (for example, details about the date a member joins the Plan, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee will need to keep some of your personal information for the rest of your life. If a pension is payable to any of your dependents after your death, we will hold your information until their pensions cease. We will continue to hold your information for a period of at least 6 years after all payments payable to you and your beneficiaries have ceased, in case any further queries arise about your membership of the scheme.

However, we review the personal data held in relation to the Plan on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format
- **Right to Rectification** – if at any point you believe that the personal data we hold about you is inaccurate, you can ask to have it corrected

- **Right to Restrict processing** – You can require us to restrict the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved
- **Right to object to processing** – As we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection.
- **Withdrawing consent** – Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- **Right to be forgotten** – You can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Plan, and/or our ability to answer questions relating to your benefits.

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

Who is responsible for collecting and using your personal information

The people responsible for collecting and using personal information are called ‘data controllers’. The Plan’s controllers include;

- The Trustee of the Plan (which is a company);
- Philip Dennis of Aon Hewitt, who is the actuary for the Plan.

To see how Aon Hewitt uses and protects your personal information, go to <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of the notice
- make a complaint about how we have handled your personal data

please contact the Secretary of the Trustee, Stephanie Jenner, sjenner@rosstrustees.com.

Making a complaint to the Information Commissioner’s Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner’s Office whose helpline number is: **0303 123 1113**.

Updates to this notice

This notice is the latest version as at 7 December 2020. This notice will be updated from time to time and you can request to see the current version at any time by contacting the Secretary of the Trustee (see “Who to contact” above).