

## **Fremantle Group Pension Plan (the “Plan”)**

This Privacy Notice, which is a requirement of Data Protection Laws (Data Protection Laws means the UK GDPR (which has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018), the Data Protection Act 2018 and any applicable privacy, data security, or data protection laws and regulations that apply to the Parties in relation to the processing of personal data), explains how we, Fremantle Group Pension Trustee Limited (the Trustee of your Plan) as data controller, use the data we collect about you. The Trustee of the Plan does not have an appointed Data Protection Officer. The Trustee is a joint data controller with the Scheme Actuary and this notice is issued on behalf of both the Trustee and the Scheme Actuary.

### **PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING**

As Trustee of the Plan our fundamental responsibility is to administer the Plan for the benefit of the members and any other beneficiaries. Types of personal data that we collect and use for this purpose include: Name, date of birth, gender, marital status, contact details; employment history including salary information; information about your membership of the Plan (for example service dates and benefit amounts); information about any other pension arrangements you have; National Insurance details, HMRC Tax Code; bank/savings account details; and health information.

Whilst much of the data we hold has been provided by you as members of the Plan, we also hold and process data provided by the sponsoring employer FremantleMedia Group Limited, and other organisations, such as HMRC, DWP, other pension schemes, regulatory bodies and tracing organisations. We also receive information from members about their beneficiaries, who may be eligible to receive benefits on the member's death.

The data that we collect in relation to you will be used to allow you to:

- i) remain a member of the Plan (whether that is a deferred member who has left employment with the employer that sponsors the Plan, a deferred member who remains in employment with the employer that sponsors the Plan, or as a pensioner); and
- ii) to ensure the efficient and regulatory compliant running of the Plan;

and for the purpose of:

- i) communicating with you about your benefits and the Plan;
- ii) responding to requests for information or queries on your benefits;
- iii) general administration, including assessing your entitlements and to pay to you and/or your beneficiaries, benefits (pension and lump sum) from the Plan;
- iv) risk management purposes such as modelling future life expectancy, managing Plan assets, insurance solutions, options that maybe provided to members in the future;
- v) improving processes and use of technology, including testing and upgrading of systems;
- vi) enable any advisers to give you advice in relation to any options available to you in relation to the benefit provided under the Plan.

We do not use your personal data for any statistical analysis in order to facilitate the sale of any services or goods to you.

We are required to advise you if automated decisions (i.e. decisions that do not involve consideration by other individuals) occur in relation to your data. We can confirm that there are no automated decisions that have significant consequences in relation to you as the data subject being undertaken in respect of the data that we hold as data controllers or by any of the data processors with whom we share data.

The Scheme Actuary, Mark Westmore of Isio Group Limited (Isio), is appointed under pensions legislation and processes your personal data to undertake various tasks, primarily around scheme funding. The individual Scheme Actuary may change from time to time and we will inform you of any changes in the Summary Funding Statements that are issued on a regular basis.

**The lawful bases on which we hold and use your data are that this is necessary for the purposes of legitimate interests pursued by the Trustee and that this is necessary for the purpose of complying with legal obligations to which the Trustee is subject.**

***For these purposes legitimate interest means our interests as Trustee in running the Plan as effectively, efficiently and securely as possible. We include within this our obligations to run the Plan in keeping with the legal requirements, which include but are not limited to trust law, pensions legislation, tax law and regulatory guidance.***

***As Trustee we also have duties and powers, some of which are conferred by law and some by the governing documentation of the Plan. Utilisation of data in order to ensure we comply with these duties and powers is also a part of our legitimate interests and legal obligation compliance requirement.***

***All the processing we do of personal data is designed to ensure that all members receive their appropriate entitlement to a pension and other benefits and that the Plan is as well funded as possible.***

***We do not consider that these legitimate interests and the legal obligation compliance requirement would cause harm or hurt to any individual in respect of whom we hold data.***

***Any sensitive data (information on ethnicity, religious belief, trade union membership, sexual orientation or health etc.) we only hold having gained your express consent relating to the data and the reason we intend to hold that data.***

## **DO WE SHARE YOUR DATA?**

At present we may share your personal data with:-

- The sponsoring employer FremantleMedia Group Limited in relation to the Plan;
- The administrators of the Plan to whom we as Trustee have delegated some of the day to day and ongoing activities essential to the running of the Plan;
- A professional actuary appointed as the Scheme Actuary to the Plan so that they can carry out the necessary calculations in order to assess the benefits and to assist us with agreeing payments to the Plan to fund the benefits;
- Insurers who provide the Trustee with insurance to cover payment of benefits or from which we purchase policies to provide pension benefits when a member comes to retire (annuities);
- Investment managers, professionals with the relevant experience to advise the Trustee on the investment of the Plan assets;
- Plan auditors, all pension schemes are required to have professional auditors appointed, who review and input into the Plan's annual accounts;
- Legal advisors who advise the Trustee on compliance with legislation and other legal issues to ensure the legal and effective running of the Plan on your behalf. Shoosmiths LLP, as legal advisors to the Plan, are also data controllers. Their Privacy Notice can be accessed via their website: [www.shoosmiths.co.uk](http://www.shoosmiths.co.uk)

On specific occasions we may also share your data with:

- Appointed covenant advisors who are specialists with knowledge and expertise in assessing the financial strength of the company/organisation supporting the Plan;
- Benefit consultants who provide advice to us about the design of the Plan;
- Advisers to the sponsoring employer for the purpose of calculating or developing options in relation to the benefits to be provided to you;
- Financial advisers selected by the Trustee or by the sponsoring employer, so that they are in a position to give advice to you in relation to any options you may have regarding the benefits provided under the Plan;
- Other third parties who provide one off services such as tracing services where we are unable to locate an individual who we believe has an entitlement under the Plan, organisations that provide secure data storage or destruction and IT specialists who advise on disaster recovery and cyber security.

We can confirm that all third parties with whom we share your data have contractually committed to compliance with the GDPR.

## **DATA RETENTION**

As long as you remain a member of the Plan with an entitlement to a benefit either for yourself, or your beneficiaries or your estate, we will retain the information necessary to allow us to fulfil our legitimate interests and manage and eventually pay that benefit entitlement.

The Trustee has a data retention policy which sets out the full details in relation to all the data that is held.

## **YOUR RIGHTS**

As an individual on whom we hold personal data you have rights in relation to that data and this Privacy Notice informs and confirms to you those rights. You have as a data subject the right:-

- to have access to your personal data by writing to the Trustee at the address at the end of this notice, and you have the right, where provided by the GDPR, to have your data transferred to you or to another Data Controller in a structured, commonly used and machine-readable format.
- to have your personal data amended if it is inaccurate or is not complete.
- to have your data deleted if there is no legitimate reason for its continued storage or processing.
- to object to your data being processed and to restrict the processing of your data in certain circumstances.
- to make a complaint about the processing of your data and the Trustee as data controller to the Information Commissions Office and contact details are at the end of this Notice.

If you have given your consent to the use of your personal data (including sensitive data), you can withdraw that consent at any time.

*Please be aware that on exercising your rights, particularly your right to withdraw consent, have data deleted and your right to object to or restrict processing of your data that the Trustee may not be able to fulfil their obligations to you in relation to the Plan in pursuant of their legitimate interests and that your entitlement to benefits may be affected. It may also be the case that the Trustee is able to confirm circumstances whereby your right is not going to be enforced where it is legally acceptable to do so and they will in that instance confirm the reasons for that decision.*

## **TRANSFERS OF PERSONAL DATA TO OTHER COUNTRIES OUTSIDE OF THE UK**

The personal data that we collect may be transferred to, and stored at a destination outside the UK by some third parties for the purposes mentioned above. Where this happens, we have put in place obligations for those third parties to have appropriate security controls and safeguards compliant with Data Protection Laws to ensure that your data is protected to the same standard as if it were in the UK.

## **CONTACTS**

The main contact for the Trustee, if you have any questions or wish to exercise any of your rights listed above is the Plan's administrator Isio. You can contact Isio by:

Email: [fremantlegrouppensions@isio.com](mailto:fremantlegrouppensions@isio.com)

Phone: 0161 871 8564

Or post: Fremantle Group Pension Plan  
Isio  
c/o SPS  
PO Box 721  
Salford  
M5 0QT

The Sponsoring Employer is FremantleMedia Group Limited.

Mark Westmore of Isio is Scheme Actuary to the Plan. Isio also provide investment advice to the Trustee.

The Plan's Investment Manager is Legal & General Investment Management.

An insurance policy is also held with Pension Insurance Corporation.

The Plan's auditors are Crowe U.K. LLP.

If you would like to make a complaint about how we have handled your information, please contact us using the details provided above.

If you are not satisfied with our response to your complaint or believe our processing of your data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Their contact details are:

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

Phone: 0303 123 1113

## **CHANGES TO THIS PRIVACY NOTICE**

The data controllers may change this Notice from time to time and we will notify you of any changes the next time we communicate with you, such as in the Summary Funding Statements that are issued on a regular basis.