

## **AkzoNobel Benefit Builder: Privacy Notice**

The Trustees of the AkzoNobel Benefit Builder (the “**Plan**”, “**we**”, “**our**” or “**us**”) are committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on what personal information about you the Plan collects, what we do with this information, the lawful basis on which personal information is processed and what rights you have.

### **Collection of your information**

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, e-mail address, national insurance number, bank account details (where a payment is to be made) and country of residence;
- information relating to your benefits such as your member identifying number (which is assigned to you by the Plan), the date you joined or left the Plan, your earnings, the amount of contributions and benefits that you receive, and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments; and
- in some cases, special categories of personal data such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement).

Where applicable, we also collect information about your dependents or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, we will collect personal information about you indirectly from the AkzoNobel entity which is your employer and from our service providers (e.g. the administrator of the Plan, which is WTW at present).

### **How we use your information**

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers (including possibly the purchase of an annuity at retirement) and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;
- b) for general administration of the Plan, such as: to implement your investment choices; to record and pay benefits; for reviews we or our administrators conduct for statistical and reference purposes; and for other administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you and to prevent fraud;
- c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Plan; and
- e) when we undertake activities from time to time to help us manage the liabilities of the Plan, (such as insuring death benefits, scheme mergers, bulk transfers, securing annuities, and transfers to draw-down providers) and including (where relevant) disclosures to

administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make disclosures to the AkzoNobel Group for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of the AkzoNobel Group, such interests in each case not being overridden by your privacy interests (see below);
- (ii) in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below;
- (iii) in some cases, necessary for the performance of a task carried out in the public interest;
- (iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or where the Plan rules require you to provide information which we cannot otherwise process without your consent; or

when we use special categories of personal data, necessary for establishing, exercising or defending legal claims, or the processing relates to special categories of personal data manifestly in the public domain, or in limited circumstances, processed with your consent which we obtain in the manner described at (iv) above. The legal grounds for processing your special categories of personal data described above appear at Articles 9(2)(f), 9(2)(e) and 9(2)(a). Examples of the 'legitimate interests' referenced above are: (i) to benefit from cost-effective services (for example, we may opt to use certain IT platforms offered by our service providers); (ii) to prevent fraud or criminal activity, as well as the security of our IT systems, architecture and networks; (iii) to exercise our rights under Article 17 of the Charter of Fundamental Rights, including our right to property; and (iv) to otherwise operate the Plan in an effective and cost efficient manner.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to implement your investment choices, or calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to administer your contributions and benefits, or record, calculate or pay your or your beneficiaries' benefits.

### **Disclosures of your information**

We typically share your information with the following recipients:

- our suppliers, including the AkzoNobel Group and other providers of services to us and them, such as administrators (WTW at present), financial advisors (to provide you with financial advice), providers of printing, communication, IT and hosting, marketing, and tracing services (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- the AkzoNobel Group, such as for audit purposes, in relation to corporate transactions initiated by the AkzoNobel Group;
- insurance companies, (Avivae and Self Assured Limited at present) such as when we carry out the activities referred to in (e) above; and
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

## **Where we store your personal data**

The data that we collect from you will usually be stored inside the UK.

However, if you live or work outside of the UK, we may need to transfer your personal data outside of the UK to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

Data may also be transferred outside the UK where the Plan's service providers host data outside the UK. These transfers will be governed by the Data Protection Laws. We may transfer your data outside the UK to a country which the UK government considers ensures an adequate level of protection of personal data. These "adequacy regulations" currently apply to a number of countries, including countries within the European Economic Area (EEA). If there are no adequacy regulations in place, we may only transfer your data if there are adequate safeguards and if you would have enforceable legal rights and effective legal remedies in respect of your data. You can contact us if you would like more information about these safeguards.

## **Retention of your information**

We will keep your information for as long as is reasonably necessary to determine members' entitlement to benefits from the Plan and to comply with our legal obligations in relation to the administration of the Plan. In general, we will keep your information for the period potentially required to be able to satisfy any questions you or other appropriate parties may have regarding the accrual or settlement benefits in the Plan. This is likely to be for an extended period after you have taken your benefits from the Plan.

## **Your rights**

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict its processing, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party. To the extent that our use of your information is based on your consent, you have the right to withdraw your consent.

You also have the right to object to our processing of your personal data.

If you have any questions or wish to exercise any of the above rights, you may send an email to:

[benefit.builder@willistowerswatson.com](mailto:benefit.builder@willistowerswatson.com)

You can also use this e-mail address if you wish to make a complaint about how we process your information.

You can also lodge a complaint about our processing of your personal information with the data protection authority in the place where you live or work, or in the place where you think an issue in relation to your personal information has arisen. The data protection authority in the United Kingdom is the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

## **Further information may be required to carry out requests**

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

## **Status of this privacy notice**

This privacy notice was last updated on 7 February 2022.

It may be subject to amendments. Any future changes or additions to the processing of personal data as described above in this private notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.  
The Trustees of the AkzoNobel Benefit Builder

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