

## Wolters Kluwer Holdings (UK) PLC Final Salary Scheme

### Data privacy notice

#### Who we are

Wolters Kluwer (UK) FSS Pension Trustee Limited is the trustee (“the Trustee”) of the Wolters Kluwer Holdings (UK) PLC Final Salary Scheme (“the Scheme”).

The Trustee of the Scheme holds certain personal information (known as “personal data”) about Scheme members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Scheme will be personal data (in other words, because the information held is information from which you as an individual can be identified, it will be subject to certain protections).

For legal purposes, the Trustee is known as the “data controller” as it decides the purposes for and the means by which the personal data held is processed.

#### What information the Trustee collects about you

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

- your name and date of birth
- your address and other contact details such as email address or phone number
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries
- medical and other details about your health
- your gender
- your marital status
- your employment history
- salary details and other details necessary to pay benefits

#### How the Trustee uses that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed to properly administer the Scheme and to calculate and pay benefits. The Trustee also keeps the above information in order to allow it to comply with its obligations towards members under the Scheme governing documents, as well as under relevant legislation. The Trustee will not collect any personal data from you that it does not need.

Personal data relating to the Scheme 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 Scheme, the Trustee may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “sensitive personal data”). Under the legislation, 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 the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. For example, the relevant legislation allows “sensitive personal data” to be processed in connection with employment, social security and social protection, and the Trustee may rely on this provision from time-to-time.

### **Who the Trustee shares your information with**

The Trustee is 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, suppliers and other parties to properly administer the Scheme, it shares personal data with the following:

- your current, past or future employer which may include group companies which are based outside the UK or the EEA. Where data is sent outside the UK or the EEA, appropriate safeguards are put in place to ensure that your data is kept secure
- the Scheme’s professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser and lawyers
- the third parties who are responsible for the day-to-day administration of the Scheme 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 the Trustee prepare various communications sent to you as a member
- the Trustee’s appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions or with a view to securing benefits through long term insurance policies
- depending upon how pensions are paid, the personal data the Trustee has to supply in order to effect a BACS transfer (the Bankers’ Automated Clearing Service in the UK and/or a payment via the administrators’ banking providers when pensions are being paid overseas
- tracing agencies who assist the Trustee with updating scheme data from time to time

The Scheme Actuary and their employer, Mercer Limited, are appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to the Scheme. In certain circumstances, Mercer Limited and the Scheme Actuary also act as data controller of Scheme personal data. They will use your personal information for this purpose and have a legitimate interest in doing so. They will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons (eg courts and law enforcement agencies). They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Mercer Limited also currently acts as Scheme administrator. Mercer is a global company and may undertake work for the Trustee through any holding company of Mercer or any subsidiary of any holding company of Mercer, including outside of the UK or the EEA. Currently it is only back-office administration duties which are performed out of Mercer's global shared operating centre in India, which could include calculations of member benefits. Mercer is an affiliate of Marsh & McLennan Companies, Inc, which has adopted processor binding corporate rules to ensure your personal data is protected when it is transferred outside of the UK and the EEA in this way. You can ask for further details of these mechanisms by contacting the Trustee (see "Who to contact about your personal data" below).

### **How long the Trustee keeps personal data for**

The Trustee 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, the Trustee must keep certain personal data (for example, details about the date a member joins the Scheme, their name and address, and details of benefits paid) for a minimum of 6 years. However, given the nature of pension schemes, the Trustee may need to keep some of your personal information for the life of the Scheme plus up to 15 years. If the Trustee concludes 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 the Trustee holds about you is inaccurate, you can ask to have it corrected
- **Right to Restrict processing** – you can require the Trustee 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 the Trustee is 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 in certain circumstances.
- **Withdrawing consent** – where you have given the Trustee your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact about your personal data" 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 Scheme, and/or the Trustee's 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 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 Trustee as follows:

Wolters Kluwer (UK) FSS Pension Trustee Limited  
C/O Hannah Hillier  
Mercer Limited  
The Paragon  
Counterslip  
Bristol  
BS1 6BX

### **Making a complaint to the Information Commissioner's Office**

If you are not satisfied with our response to any query you raise with the Trustee, or you believe the Trustee is 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 22 October 2020. This notice may be updated from time to time. If at any point you require a further copy of the notice, please let us know (see "Who to contact about your personal data" above).