

DXC UK TRUSTEE LIMITED

COMPANY NUMBER 02847817

Email

DXCUKTL@xpsplc.com



Correspondence Address

DXC UK Trustee Limited
C/O XPS Pensions Group,
1 Station Hill, Reading, RG1 1NB



Registered Address

Royal Pavilion, Wellesley Road,
Aldershot, GU11 1PZ



Dear Member,

Privacy notice for the DXC UK Pension Scheme, DXC Pension Plan and Electronic Data Systems Retirement Plan ('the Schemes')

Data protection regulation is extremely important to ensure that personal information is kept securely and used only for the right purpose. DXC UK Trustee Limited (the "Trustee"), the Trustee of the DXC UK Pension Scheme (formerly known as the EDS 1994 Pension Scheme), DXC Pension Plan and EDS Retirement Plan ('the Schemes'), is committed to protecting and respecting your privacy. The Trustee and its advisers have been complying with the UK General Data Protection Regulation and the Data Protection Act 2018 (together, the "Data Protection Laws") since they came into force.

This privacy notice provides the following information:

- what information we collect about you and your dependants;
- how we use this information;
- when we use your details to contact you;
- whether we disclose your details to anyone else;
- your choices regarding the personal data you provide to us; and
- your rights in respect of personal data we hold.

Please read the following carefully to understand our views and practices regarding your personal information, and how we will treat it. By your continued participation in the Schemes, you are agreeing to the practices described in this Data Privacy Notice.

What basis does the Trustee have to process my personal data?

As a Data Controller, the Trustee collects and processes your personal data for the purposes of complying with its legal obligations under trust law and its responsibilities and legislative and regulatory requirements affecting pension schemes. The Trustee also has legitimate interests in processing personal data to ensure the proper administration of the Schemes and to enable it to calculate and pay benefits. We will only collect and use your information where we have lawful grounds and legitimate business reasons to do so.

As part of running the Schemes, 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" or "special categories of personal data"). Under the Data Protection Laws, 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 Data Protection Laws allow it (for example under the condition set out in relevant legislation permitting the processing of special categories of personal data in connection with employment, social security and social protection), this information cannot be processed or passed to a third party without your explicit consent.

We will be transparent in our dealings with you and tell you how we collect and use your information. If we collect your information for a particular purpose, we will only use it for that purpose, unless you've been otherwise informed and given your permission where relevant. We will ensure that our records are updated when you tell us that your details have changed, and we will periodically review your personal data to ensure that we don't keep it for longer than is necessary. At the end of the retention period, we will ensure that your information is securely disposed of.

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Personal data we collect about you and your dependants

Personal data is information that could be used to identify you as an individual. So, things like your name, National Insurance Number, date of birth, gender, marital status, length of employment, home address, details about your pension benefits and bank details are types of personal data that are processed by the Trustee.

Your personal data is collected from many sources, including the following:

- Direct to the Trustee by you or your financial adviser, either orally, in writing or electronically
- Through the member website by you (if one is available to you)
- From your current or former employer
- From persons acting as personal representatives of a deceased member's estate
- From a public body such as HMRC
- From public databases such as the Register of Births, Deaths and Marriages
- From other pension schemes, where transfers into the Scheme have been made
- From an independent financial adviser, solicitor or other person instructed by you to provide us with information
- With your consent, from a registered medical practitioner.

We may also hold similar personal data about your dependants.

The Trustee aims only to collect and hold the information about you which is necessary for the running of the Schemes. This will include information we have collected in the past as well as new information we obtain. In order to properly administer the Schemes and to calculate and pay benefits, we may also need to hold other information about you from time to time. Your personal data is held on paper and on computer systems, which are protected by appropriate physical and technological security measures.

Where you have provided us with information about other individuals, such as family members, dependants or potential beneficiaries under the Schemes, please ensure that those individuals are aware of the information contained within this privacy notice.

You have the right to withdraw any consent you have given for us to hold and process additional or special category personal data. If you do, our ability to administer your benefits may be restricted which could mean the benefits payable to you or your dependants are affected. We will explain this to you at the time.

Who has access to my data?

The Trustee needs help from various entities to properly administer the Schemes, so your information may be disclosed to a number of third parties.

The administrators in relation to the Schemes who look after your member records and calculate your pension benefits are the organisations that hold complete records of all members of the Schemes. The Scheme Actuary needs access to some of that data in order to assess how well funded the Schemes are and sometimes in order to assist in calculating benefits. From time to time, other organisations will also need access to your data, for example, the Schemes' Auditor will see limited amounts of personal data in order to ensure that the scheme's finances are in order and the correct benefits are being paid out. The Schemes' legal advisor may need to be consulted on individual cases and medical advisers may be passed information in relation to ill-health early retirement applications. If you are a pensioner we have to provide information to Her Majesty's Revenue and Customs (HMRC) so that they know what tax has been deducted from your pension.

The Trustee may also share your personal data with the sponsoring employer of the Schemes. It has a legitimate interest in the Schemes being run in a cost effective way and may have an interest in offering certain options to

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members, such as a Pension Increase Exchange or enhanced transfer value exercise. The Trustee may also share your personal data with its advisers and insurance companies for risk management purposes. Any financial advice firm or individual financial advisers appointed by the Trustee to provide advice to you in connection with your Scheme benefits and options at retirement may also need to be provided with your contact details and certain other personal data held by the Scheme in order that they can provide that advice.

The Trustee will also share your personal data with the printers who help prepare various communications which are sent to members, appointed providers for the purposes of life insurance and additional voluntary contributions, banking providers to allow pensions and other benefits to be paid, as well as with insurers, where the Trustee seeks to provide benefits for members with insurance or for the purposes of liability and risk management exercises.

In some circumstances the Trustee will be required to share information with HMRC and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator), tracing agencies and health care providers to comply with our legal, regulatory and statutory obligations.

All of the organisations that need access to your personal data will have to comply with the Data Protection Laws but the Trustee and their advisers will also check to make sure that they are confident that your personal data will be secure. We require these third parties to comply strictly with our instructions and we require that they do not use your personal data for their own business purposes. A full list of the organisations that we share your data with is available on request (from the address shown at the end of this notice).

Some of these entities may transfer data to other countries, including countries outside of the United Kingdom. Where this is the case, we (or the relevant entity) will comply with any requirements set out in the Data Protection Laws and ensure that appropriate safeguards are in place to keep your personal data secure. This may include entering into data transfer agreements based on the model clauses approved by the European Commission or the UK to ensure that third parties commit to ensuring an adequate level of protection for your personal data.

Where we have information in relation to proposed beneficiaries, who may become eligible to a benefit on a member's death, we will advise the individual of their data protection rights if a benefit becomes payable from the Schemes.

What will you do with my personal data and how long will you keep it?

The reason we hold individual member records (that contain personal data) is so that the correct pension benefits can be calculated when members retire and once retired, members continue to be paid the correct pension. The Trustee's advisers will need access to that information to ensure that everyone receives the correct pension and in the event of a member's death that dependants are also paid the correct benefit.

We will need to hold personal data for as long as is necessary for the administration of the Schemes. This is likely to be for many years, probably until long after your own death and any dependants pension ceases. In practice, we will continue to hold your personal data for the life of the Scheme.

In practical terms, there are often occasions when a review of historical member information is necessary. One of the most recent examples of this is HMRC's decision to cease the practice of contracting out of the State Pension Scheme. In this case, the Schemes' administrators looked back at records held up to 40 years ago to make sure that every member's contracted out record was correct and in line with that held by HMRC.

What rights do I have?

You have the right to see your own pension scheme record (this is known as a Subject Access Request) and you can require that we rectify any errors in data that we hold about you, but in addition, you will (under certain circumstances) have the right to be forgotten or have your personal information deleted. You also have a right

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to ask us to restrict or object to the processing of your personal information in certain circumstances.

However, as far as the Schemes are concerned, the Trustee can override some of these rights in certain circumstances, as without your personal information the administrator would not be able to calculate your benefits.

If you are asked to provide consent (e.g. to agree that another organisation can have access to your personal data, or for us to use especially sensitive information, such as information about your health) then you have a right to withdraw that consent at any time. However, if we do not hold all of the data to administer your benefits, we may not be able to pay out the benefits you are entitled to.

If you wish to exercise your rights in relation to your information or want more information on the content of this privacy notice, please contact the Scheme Secretary using the contact details below.

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

If you are unhappy with the way your data has been used, you can complain to the Information Commissioner's Office (ICO) at the address below:

Information Commissioner's Office

Wycliffe House

Water Lane

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use the national rate number.

September 2024

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Scheme Actuary

The current Scheme Actuary and XPS Pensions Group Limited (when providing defined benefits actuarial consulting services), are also Data Controllers, so we share your personal information with XPS Pensions Group in order for them to provide these actuarial services. The XPS Pensions Group Privacy Information can be viewed by accessing the following link: <https://www.xpsgroup.com/privacy-policy/>

XPS Pensions Group may make changes to its privacy notice from time to time so you should check the latest version of its Privacy Information occasionally. They take your privacy very seriously and ask that you read XPS Pensions Group's Privacy Information carefully as it contains important information on:

- The personal information we share with XPS Pensions Group in relation to the services provided;
- What XPS Pensions Group does with your information;
- Who XPS Pensions Group may share your information with; and
- What rights you have regarding XPS Pensions Group's holding of your information.

The Scheme Actuary may change. If you wish to know who the current Scheme Actuary is, please refer to the most recent scheme accounts, or contact the Trustee.