

## Credit Suisse Group (UK) Pension Fund

### Credit Suisse Group (UK) Pension Fund – Privacy Notice

September 2023

Independent Trustee Services Limited, part of the Independent Governance Group, is the Trustee of the Credit Suisse Group (UK) Pension Fund (the “**Fund**”). Independent Trustee Services Limited (“**we**”) acting in our capacity as Trustee of the Fund is committed to protecting the personal information of our members (“**you**”) and acting in accordance with your rights under data protection law. We are a “data controller” which means we are responsible for deciding how we hold and use your personal data.

Sometimes, our actuarial advisers, Aon Solutions UK Limited, and the scheme actuary need to make decisions jointly with us about how your personal information will be used for the purposes of the Fund. Aon Solutions UK Limited and the scheme actuary have their own privacy notice relating to the Fund, a copy of which is attached as an Appendix to this notice.

#### Collection of your information

We collect and process the following information about you:

- your personal details: your name, gender, date of birth, contact details (e.g. home address, phone number or email) national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits: your member identifying number (which is assigned to you by the Fund), the date you joined or left the Fund, your earnings, the category and value of contributions and benefits that you receive, any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax information, tax protections or other adjustments; and
- in some cases, special categories of personal information: your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you) (referred to as “**special categories of personal data**”).

Where applicable, we also collect information about your nominated beneficiaries, 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.

The information about you that we collect comes from:

- application forms or other materials you submit to us in relation to your membership of the Fund;
- your interactions with us, transactions and use of our products or services (including the use of our website);
- your legal representatives or guardian (if applicable);
- regulatory authorities (such as The Pensions Regulator) or government departments (such as HMRC or DWP); and

- in some cases, directly from Credit Suisse as your employer or from third parties providing certain services for the Fund, such as tracing and mortality screening services.

## 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 and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other pension schemes;
- (b) for general administration of the Fund, including but not limited to, recording, calculating and paying benefits, actuarial valuations, reviews we or our administrators conduct for statistical and reference purposes, for audit purposes, any corporate transactions, employee restructuring, human resources or benefit changes undertaken by Credit Suisse as your employer, to allow you to flex your benefits including your pensions options, and other checks or administrative activities that become necessary from time to time (for instance member tracing) should we happen to lose contact with you or to prevent fraud;
- (c) for meeting our on-going regulatory and compliance obligations, assisting regulators or other authorities with the investigation or prevention of crime, and carrying out internal investigations in relation to the same;
- (d) to improve our processes and our use of technology, for testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Fund; and
- (e) when we, or relevant Credit Suisse group companies, undertake activities from time to time to help us manage the liabilities of the Fund. Examples of this activity are obtaining life insurance, longevity hedging, risk transfers, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises and (where relevant) disclosures to Credit Suisse group companies or 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 the purposes of the following legitimate interests:
  - our legitimate interests in providing you and your survivors with benefits to which you are entitled under the Fund and administering the Fund, by pursuing the purposes set out in a) to e) above;
  - the legitimate interests of the Credit Suisse group of companies in providing and/or securing retirement, ill-health and death benefits under the Fund and carrying out the audit and corporate transaction purposes referred to above; or
  - your legitimate interests and those of your survivors in receiving benefits to which you are entitled under the Fund,to the extent that such interests are not overridden by your privacy interests;
- (ii) required to meet our legal or regulatory responsibilities, respond to a request from relevant authorities, regulators or government bodies referred to below, or to make a disclosure to the same;
- (iii) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special category personal information, necessary for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain; or

- (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 Fund rules require you to provide information which we cannot otherwise process without your consent.

You are not obliged to provide us with your information when it is requested from you. However, if such information is required by us to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries and this information is not provided, we may be unable to record or pay your or your beneficiaries' benefits.

We may, at times, need to process special categories of personal data such as information about health or sexual orientation. The processing of this type of data is only permitted in more limited circumstances. We may, for example, process special categories of personal data:

- where you have given your explicit consent;
- where the processing is permitted on the basis that it is in connection with employment, social security and social protection; or
- where you have made the data manifestly public.

## **Disclosures of your information**

We may share your information with the following recipients:

- our suppliers, relevant members of the Credit Suisse group and other providers of services to us and the Credit Suisse group, such as administrators, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Fund actuary (for actuarial calculations), auditors (to audit the Fund), legal advisers, investment consultants (to provide the Trustee with investment advice), insurance brokers (to manage actual and potential insurance claims on behalf of the Trustee) and printing, communication, IT and hosting, marketing, tracing and marital status checking providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal information remains secure);
- members of the Credit Suisse group for other relevant purposes, such as for audit purposes, or in relation to corporate transactions initiated by the Credit Suisse group, or to allow you to flex your benefits including your pensions options;
- insurance and reinsurance companies, or the trustees and/or managers of other pension schemes, such as when we carry out the activities referred to in e) above;
- third parties with whom you have put us in contact such as another pension scheme to which you wish to transfer, your financial adviser or your GP;
- public authorities, regulators or government bodies when desirable or required by law or regulation, under a code of practice or conduct, or when these authorities or bodies otherwise require us to do so; and
- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Except where permitted by data protection legislation, we will not process your special category personal data nor pass it to a third party without your explicit consent.

## Transfers of your information abroad

In some circumstances, the use and disclosure of your information, for the purposes referred to in e) above, will involve transferring your information outside of the UK or the European Economic Area. In those cases, except where the relevant recipient country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom.

We transfer personal information to the following countries:

- India
- United States of America
- Philippines

Further details of these transfers including copies of any data transfer agreements we use are available from us on request (please see the “Contact Us” section below for further details about how you can get in touch with us if you have any questions).

## Retention of your information

We will keep your information for the longer of (i) the period required to meet our legal or regulatory responsibilities, or (ii) the period envisaged within our records management policy. We determine the period envisaged within such documentation regarding the Fund’s operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Fund, and responding to legal claims or regulatory requests. For example, your information which is used for the purposes of the annual scheme audit is retained for eight years after each annual audit. Because of the nature of a pensions scheme we may need to hold on to your information for your lifetime and after you have died (i.e. to allow us to pay benefits, including benefits payable in the event of your death and respond to queries).

If you would like to know how long a particular type of record is retained, please contact us (see the “**Contact Us**” section below for our contact information).

## Your rights

You have the following rights under data protection law:

- the right of access to your personal information held by us;
- the right to rectify your personal information when it is inaccurate and supported by appropriate evidence;
- the right to have certain personal information erased;
- the right to request that your personal information is only processed for restricted purposes;
- the right to object to the use of your information, including telling us that you do not wish to receive marketing information; and
- (in some circumstances) the right to require that certain of your information is transferred to you or a third party.

You also have the right to withdraw your consent at any time to the use of your information, to the extent such use is based on your consent. If you withdraw your consent, this does not affect the validity of any data processing which has taken place before your consent is withdrawn and it may affect our ability to provide benefits to you or your beneficiaries.

You can seek to exercise any of these rights by contacting us at the details in the “**Contact Us**” section below.

You can lodge a complaint about our processing of your personal information by contacting us at the details in the “Contact Us” section below.

If you would like to find out more about your rights, you can visit the Information Commissioner’s Office website (<https://ico.org.uk/your-data-matters/>). You also have the right to lodge a complaint about our processing of your personal information with the office of the Information Commissioner. For more information, you can visit the Information Commissioner’s Office website [Make a complaint | ICO](#)

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

In some cases, it will be necessary to obtain additional information from you, such as to carry out your request for a transfer, to retire early on grounds of ill-health, receive certain lump sums or for payment of discretionary death benefits. We will notify you when your information is required for this purpose.

### **Status of this privacy notice**

This privacy notice was updated in September 2023. It is non-contractual. We reserve the right to amend it from time to time. Where we do so, we will take appropriate steps to bring the amendment to your attention.

### **Contact us**

If you have any questions about this privacy notice, you can contact us:

- at the following address  
Chief Operating Officer to the Trustee of the Credit Suisse Group (UK) Pension Fund  
Independent Governance Group, 4<sup>th</sup> Floor, Cannon Place, 78 Cannon Street, London EC4N 6HL
- and by email: [creditsuisse@weareigg.com](mailto:creditsuisse@weareigg.com)

## **Appendix**

### **Privacy Notice of Aon Solutions UK Limited**

Aon Solutions UK Limited (and, where appointed, the scheme actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which Aon use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

Aon may pass your personal information to third parties such as financial advisors and benefits providers, insurers, their affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in Aon's full Privacy Notice. Aon recommend that you review this notice which is available online at <https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement> , or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH, or via email to [RI.UK.PrivacyChampions@aon.com](mailto:RI.UK.PrivacyChampions@aon.com).