

Vidett Trust Corporation Limited (the "Trustee")

Privacy Notice – personal information

The Dresdner Kleinwort Healthcare Trust (the "**Scheme**") provides certain benefits relating to medical treatment for eligible members previously employed by Commerzbank Finance Limited ("**Commerzbank**") and their dependants. The Trustee needs to collect and use personal information about such persons in order to adjudicate any matters connected to the trust and payment of benefits from the Scheme.

This privacy notice tells you what to expect from the Trustee with regards to the personal information of the Scheme members. It is being issued by the joint data controllers in relation to the Scheme to comply with the United Kingdom General Data Protection Regulation ("UK GDPR"). The UK GDPR replaced its predecessor, the EU GDPR, after Brexit. This document replaces any Fair Processing Notice previously issued under the Data Protection Act 1998 and under the EU GDPR and is for your information only.

The data controllers in relation to the Scheme are Vidett Trust Corporation Limited ("the "Trustee"), the appointed medical provider (currently AXA PPP Healthcare Administration Services Limited), and Commerzbank Finance Limited. In some circumstances it may also include legal advisers, who will process personal data to comply with their professional duties as advisers to the Trustee.

1. Our contact details

For general details about the Scheme, please use the usual Scheme Client Team mailbox at dresdnerkleinworthealthcaretrust@vidett.com

The contact details of our Data Protection Officer are:

- **Name:** Simon Riviere
- **Address:** 3rd Floor Forbury Works, 37-43 Blagrove Street, Reading, RG1 1PZ
- **Telephone:** 0118 207 2900
- **Email:** info@vidett.com

2. Personal information we use

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

We may collect and hold personal information about you from a variety of sources, including information from you directly, from Commerzbank, and from AXA PPP Healthcare Administration Services Limited ("**AXA**"), who administers the Scheme.

3. What Information may we collect?

Examples of the categories of personal information that we may collect (including some special categories of sensitive information) are:

- (a) personal details (for example, your name, date of birth);
- (b) your bank details and national insurance number;
- (c) your relationships (including family members);

- (d) your state of health; and
- (e) your contact details (for example, your address, phone number and email address).

4. How will we use your personal information and why?

The Trustee will have used your personal information, amongst other information, to assist when adjudicating the payment of benefits from the Scheme. In addition, the Trustee may use your personal information to communicate with you.

We must have a legal reason to use your personal information. The reason we have used your personal information is to fulfill our legal obligation to pay benefits from the Scheme properly and to comply with our general obligations under law.

5. Information sharing

We may share personal information with:

- (a) our advisers (such as our legal advisers) to facilitate the operation of the Scheme and ensure we pay benefits correctly and the Schemes auditors;
- (b) our auditors (currently RSM)
- (c) Her Majesty's Revenue and Customs (HMRC) and other Government organisations; and
- (d) Commerzbank and AXA.

6. Security and storage

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

If we share your personal information with any third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

We currently intend to keep certain personal information for 6 months after a dispute is resolved. Your personal information will be retained by AXA for a longer period of time, in accordance with their own privacy policy.

7. Your rights

Under data protection law, you have rights including:

- (a) **Your right of access** - You have the right to ask us for copies of your personal information (a data subject access request).
- (b) **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- (c) **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- (d) **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

- (e) **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- (f) **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- (g) **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have 30 days to respond to you. To make a data subject access request, please contact us using the contact details under section 10 of this privacy notice.

8. International data transfer

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under European Union law. If your personal information is to be transferred outside the UK we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. For more information on any safeguards in place, please contact us.

9. Changes to this policy

We may update this privacy notice from time to time. Updates are effective from the date on which they are made available.

10. How to contact us

- a. If you have questions or concerns about the use of your data please contact Kevin Clarke or Matthew Wickett at Vidett, 37-43 Blagrove Street, Reading, RG1 1PZ, or via email at dresdnerkleinworthhealthcaretrust@vidett.com.
- b. If you believe that we have not resolved those concerns, you have the right to raise a complaint (see section 11 of this notice).
- c. We encourage you to let us know if your personal information changes or if you think the information held about you is out of date.

11. Right to make a complaint

You have the right to make a complaint with the Trustee (as data controller) or the Information Commissioner's Office if you are concerned about the way in which your personal data is being processed, as well as the right to seek a remedy through the courts.

Details of how to contact the Information Commissioner's Office are set out in section 12 "Complaints" of this notice.

12. Complaints

If you have any concerns in relation to the way your personal data has been handled, or consider there has been any breach of the Data Protection Legislation in respect of your personal data, **you can raise a complaint to the Trustees by completing the Complaint Form at the end of this notice (see page 5) and returning it to the Trustees by post or email using the details above.**

The Trustees will acknowledge your complaint within 30 days of receipt and then take appropriate steps to respond to your complaint (and inform you of the outcome) without undue delay.

If the Trustees require further information in order to consider or respond to your complaint, we will let you know as soon as possible, but this may increase timeframes for the Trustees' response.

You also have the right to raise a complaint with the UK supervisory authority for data protection, the Information Commissioner's Office (ICO). You can contact the ICO at:

Address	Information Commissioner's Office Wycliffe House Water Lane Wilmslow SK9 5AF
Website	https://www.ico.org.uk/make-a-complaint
Telephone	0303 123 1113

Please keep a copy of this Notice safe along with your other records relating to the Scheme.

Data Protection Complaint Form

The Dresdner Kleinwort Healthcare Trust

Full name:	
Date complaint made:	
Address:	
Membership information:	Membership number (if known): Date you joined the Scheme: Date you left the Scheme (if applicable):
Status (please tick):	Member () Spouse () Dependant () Other ()
Personal data affected:	

Reason for complaint <i>(Please explain the reason for your complaint, the personal data affected by the complaint and any key times/events relevant to your complaint.)</i>	
Data subject rights exercised (if any) – see Section 7 of this notice.	