

PRIVACY NOTICE FOR THE KBC BANK N.V. (UK) STAFF PENSION PLAN
(the “Plan”)

The Trustees hold and process personal data about Plan members and beneficiaries in order to run the Plan. In doing so, we comply with relevant data protection legislation.

What we do with your data

As a data controller, the Trustees collect and process your personal data for the purposes of complying with their legal duties to administer the Plan, and for other legitimate purposes relating to the operation of the Plan, which include the calculation, administration and payment of benefits under the Plan before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, purchasing annuities or other insurance products from insurers, investment of the Plan’s assets, or dealing with any queries or complaints regarding benefit entitlements. The legal basis for doing so is in order for the Trustees to comply with their legal obligations, and other legitimate interests, such as the efficient management of the Plan. The Trustees also process personal data for other legitimate purposes relating to the operation of the Plan, for example this could include de-risking exercises.

Whilst much of the data we hold has been provided by you, we also hold and process data provided by KBC Bank N.V. and KBC Investments Limited (the “**Plan Employers**”) and Premier Homeloans Limited, a former Plan employer, other schemes from which members have transferred, HMRC, the DWP and regulatory bodies and by organisations which trace members of the Plan (e.g. when a member has changed their contact details but not informed the Plan). We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member’s death. This may include the proposed beneficiaries’ name, address, relationship to member, and any other relevant information provided by the member. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals.

The data we hold is to assist us to calculate and pay the benefits the members are entitled to, and this includes your name; postal address; salary; years of service with the Plan Employers and/or Premier Homeloans Limited; date of birth; NI number; passport number and details; driving licence number; contact details (including telephone number, mobile number, and/or email address); details of any pension sharing orders made on divorce; financial information such as bank account details and pension entitlement; marital status; employment / retirement status; and start date and leave date of membership with the Plan.

We also hold some special categories or “sensitive” data about individuals for the purposes of administering the Plan (for example in relation to ill-health or death benefits). We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits (including when considering claims under the Plan’s Internal Dispute Resolution Procedure) or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

Who else processes your data?

We share your personal data with certain third parties involved in running the Plan, for example, the administrator of the Plan (currently Barnett Waddingham); the Plan Actuary (currently Mark Roberts); the Plan Employers; the Trustees’ legal advisers (currently CMS); the Plan’s auditors (currently Moore Stephens); additional voluntary contribution providers; insurers and where applicable, their counterparties (such as reinsurers) and brokers who are typically involved in arranging such insurance for the purpose of purchasing

annuities or other insurance products; the Trustees' bank account providers; and regulatory bodies, for example: HMRC; the Pensions Ombudsman; the Pensions Regulator and the Pensions Advisory Service.

In some circumstances, we are joint controllers with the Plan Actuary and the legal advisers who will process personal data to comply with their professional duties as advisers to the Trustees. We may also be joint controllers with the Plan Employers who hold personal data to comply with their legal obligations as the sponsoring employers of the Plan. They have a legitimate interest in the Plan being run in a cost effective way and may have an interest in offering certain options to members. The Trustees will share information with the Plan Employers and their auditors and advisers for this purpose.

The Plan Employers, Barnett Waddingham and other advisers and third parties will from time to time transfer data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Plan is based on information that may go back many years. Our policy is therefore to retain information relating to you whilst you are a member and for as long as the Trustees need it.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information will be held for longer where we consider it appropriate in order to ensure the Plan pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

As far as possible, the Plan's administrator Barnett Waddingham will delete or return personal data to the Trustees after the termination of the contract with the Trustees, unless storage of personal data is required by law or as required to defend any actual or possible legal claim.

Your rights

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

You can exercise your rights by using the contact details below.

Contact details

The contact details of the Trustees are:

Address:	Trustees of the KBC Bank N.V. (UK) Staff Pension Plan c/o Barnett Waddingham LLP, Decimal Place, Chiltern Avenue, Amersham, HP6 5FG
Email:	KBC@Barnett-Waddingham.co.uk
Telephone:	01494 788 499

Please use the above contact details if you would like to contact any other controllers listed in this notice or if you would like further information about how your data is processed.

What if you have a complaint?

To make a complaint about how we've handled your information, contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 700

The Trustees reserve the right to amend this privacy notice from time to time.

26 September 2024