

Oracle UK Pension Plan – Privacy Notice

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the Oracle UK Pension Plan (the Plan) to comply with the General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controllers

The Trustee of the Plan is Dalriada Trustees Limited, represented by Adrian Kennett. The Scheme Actuary to the Plan is Paul Hubbard of Barnett Waddingham LLP.

In accordance with guidance issued by the Information Commissioner's Office (ICO) and the Institute and Faculty of Actuaries (IFoA), the Trustee and Scheme Actuary of the Plan are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR.

The joint data controllers can be contacted as follows:

Barnett Waddingham LLP
Silver Springs House
2 Topaz Way
Birmingham Road
Bromsgrove B61 0GD
Email: Oracle@barnett-waddingham.co.uk
Telephone: 0333 11 11 222

Use, transfer and storage of personal data

In order to operate the Plan and pay benefits to members, we are required to hold the personal information about Plan members such as:

- Personal details including your name, National Insurance number, gender, age, date of birth, marital status, postal and/or email address and telephone numbers.
- Salary and data relating to investments and pension assets held within and outside of the Plan (where relevant for pension administration matters).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefits and HMRC tax code information.
- Descriptions relating to your physical and/or mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Plan, eg to comply with a request for early retirement due to health reasons).

In operating the Plan we may also require information from you in relation to your spouse, civil partner or other beneficiaries where it is relevant, as this information will be used by the Plan's administrators to determine the benefits payable to you and your beneficiaries.

Your personal data is provided to the data controllers by the Employer or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Plan. Your personal data will be stored for at least the lifetime of the Plan.

The Trustee shares your data with the Plan's administrator Barnett Waddingham, the Scheme Actuary and, the Employer. They may also share data with the Trustee's other professional advisers (including the Plan's Auditor, legal advisers, annuity brokers and other pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Trustee may share your data with the Employer in connection to their obligation to fund certain benefits under the Plan. The Employer may use your data for the purposes of preparing annual disclosures for the Company's audited accounts; reviewing the funding position of the Plan or; providing information to the members about access to the pension freedoms (either via a one-off exercise or as a business as usual offering) or other incentive exercises.

Your data may be shared by the Plan's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustee's formal Data Mapping document, available on request in writing to the data controllers at the address above.

The Plan's administrator, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's legal obligation to run the Plan in accordance with the Trust Deed and Rules. The Trustee and/or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustee's legitimate interests to use your personal information to:

- Keep up to date and accurate records about your membership of the Plan in order to calculate and pay benefits
- Comply with the law, including regulations and guidance issued by the Pensions Regulator
- Efficiently manage the relationship between the Plan and the Employer, which may include undertaking risk-management exercises at the request of the Employer

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Plan. This advice helps to ensure the Trustee is able to meet their obligations to pay members' benefits, and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

The Trustee has conducted due diligence on their suppliers to ensure they process data within the UK and/or the European Economic Area (EEA). Your personal data will not be transferred outside the EEA unless you request for this to be done in order to receive benefits.

Your rights in relation to your data.

This Privacy Notice meets your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data. If you wish to request copies of your personal data please contact the data controller at the address above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the data controller with the ICO.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Plan, and your benefits could be affected.

Further details about GDPR and your rights under GDPR can be found on the ICO's website at <https://ico.org.uk/>