

GDPR – Privacy Notice

Servier Laboratories Limited Pension Fund

Who we are

As the Trustees of the Servier Laboratories Limited Pension Fund ("the Fund"), we hold certain personal information (known as "personal data") about Fund members and, where applicable, their dependents and beneficiaries. Most of the information held about you and processed by the Trustees in running the Fund will be personal data (in other words, because we hold information from which you as an individual can be identified, any information we hold in respect of you will be subject to certain protections).

For legal purposes, the Trustees are known as the "data controller", as we decide the purposes for and the means by which the personal data we hold is processed. The scheme actuary and/or the employer will be a joint controller alongside the trustees.

What information we collect about you

- Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:
- your name
- your age and date of birth
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number and employee number
- information about your benefits under the Fund, including pensions and death benefits, together with corresponding details of assets, investments, and insurance.
- your pensionable service
- relevant employment information, such as current and past salary information, pensionable pay, employment dates, length of service, and career history (where relevant)
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender), current relationship status, marital / relationship history.
- details about your next of kin and emergency contact information
- medical and other details about your health.

In order to properly administer the Fund and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we gather your personal information

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependent's benefit from the Fund, or a benefit resulting from divorce or the dissolution



of a civil partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death. We will not collect any personal data that we do not need.

How we use that information

The Trustees have a legitimate interest in holding and processing the above information about you as it is needed for us to properly administer the Fund and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Fund governing documents, as well as under relevant legislation.

Personal data relating to the Fund is held on paper and on computer systems. As the "data controller", the Trustees must process this information fairly and lawfully.

As part of running the Fund, we may also need to hold and process particularly sensitive information about you and/or your dependents and beneficiaries (known as "sensitive personal data"). Under data protection legislation, 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 legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

We will not process personal information for any purpose or purposes which we have not told you about. However, there are exceptions to this. For example, if it were obvious to an individual that personal information would be processed for the new purpose or if the new purpose was in fact compatible with the original purpose(s) for which the personal information was collected.

What else we do with personal data

We may transfer, store, or process your personal data outside of the United Kingdom. Where this is the case, we will take reasonable steps to ensure that your personal data continues to be appropriately secured. This may include entering into data transfer agreements based on the model clauses approved by the European Commission or the UK Government, to ensure that third parties commit to ensuring an adequate level of protection for your personal data.

Who we share it with

We are not allowed to disclose personal data about you to other parties except:

- when required for contractual or legal reasons or other specifically identified purposes; or
- where you have given your consent.

As the Trustees need help from various advisers to properly administer the Fund, we share personal data with the following:

- the Fund's professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser, lawyers, and Scheme auditors.
- the third parties who are responsible for the day-to-day administration of the Fund on behalf of the Trustees.



- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) or other third parties as required by law – the Trustee can be fined and subject to other action if they fail to provide certain information to these authorities.
- persons in connection with any investment changes, sale, merger, acquisition, disposal, reorganisation, or similar change involving the Fund (including any counterparties, potential or actual purchaser and their advisers)
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement.
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- the personal data we have to supply in order to affect a BACS transfer (the Bankers' Automated Clearing Service)
- tracing agencies

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Fund, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustees may be required to keep some of your personal information for the rest of your life.

However, we review the personal data held in relation to the Fund on a regular basis in accordance with our data retention schedule. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

Your rights

- Right of Access – you have the right to request information about the processing of your personal data, see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.
- Right to Rectification – if at any point you believe that the personal data, we hold about you is inaccurate/wrong, you can ask to have it corrected
- Right to Restrict processing –you can require the Trustees to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- Right to object to processing – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustees can override this objection in certain circumstances.
- Withdrawing consent – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand, and it may be possible for the Trustee to continue processing your personal data where this is justified.
- Right to be forgotten – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.
- Right to Portability – you have the right to request the transfer of your personal data to another data controller in a structured, commonly used, and machine-readable format, where applicable.



- Right to complain – you have the right to complain to the Information Commissioner's Office, or to bring an action before the court, if your personal data rights are not complied with (see "Making a complaint to the Information Commissioner's Office" below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Fund, and/or our ability to answer questions relating to your benefits.

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

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above.
- request a hard copy of the notice.
- make a complaint about how we have handled your personal data.

please contact the Human Resources Department at the following address.

The Servier Laboratories Limited Pension Fund Sefton House, Sefton Park, Bells Hill, Stoke Poges, Slough SL2 4JS.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113 or via email at DataPrivacy-UK@servier.com

Updates to this notice

This notice is the latest version as at 5 June 2024.