

LOOKING AFTER YOUR DATA



As a Trustee group, we have a responsibility to take care of your personal data, and it's one we take seriously.

The 30 second version

- We need your personal data to help us run the Plans and to work out and pay your benefits
- To help us do that, we have to share your personal data with some of our advisers and other third parties
- You have the right to know what data we hold about you, how we use it and who we share it with
- We're not allowed to share personal data about you with other organisations and people, unless the law allows us to do so, or you have given your consent
- You also have the right to withdraw your consent to the use of your data or object it to it being processed, although this could impact on the payment of your benefits

Who are we?

We're CG Pension Trustees Limited and we act as Trustee for the Citi (UK) Pension Plan, Citibank (UK) Pension Plan and Citigroup Global Markets Limited Pension and Life Assurance Scheme (which we're going to refer to as "the Plans").

We need to hold and process "personal data" about you (information that could be used to identify you) so that we can administer the Plans and calculate and pay your benefits. It may also include information about your dependants and beneficiaries.

We only use your personal data for the purposes for which it was intended.

You have the right to know how your personal data is held and used, and we've produced this guide to help with that. It explains our approach to managing and protecting your personal data, which includes:

- what information we hold about you,
- how we use that information,
- who we share it with,
- how long we keep it for,
- your legal rights in relation to your data; and
- who to contact about your personal data.

What information do we hold 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,

- details of your bank account to pay ongoing benefits to (if you are a pensioner) or to pay a lump sum to you,
- relevant employment information (including current and past salary information and employment dates)
- details about your dependants and/or beneficiaries where this is needed so that we can pay benefits following your death,
- medical and other details about your health, if you apply to begin to receive benefits on grounds of ill health; or
- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a "pensions identifier", which is a string of characters used to identify your specific benefits under each of the Plans.

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

How do we use your information?

We use the information we hold about you so that we can administer the Plans and calculate and pay your benefits. In legal terms, this means that we have what's known as a "legitimate interest" in processing the information.

We also process and retain personal data:

- to allow us to comply with our obligations towards members under each Plan's governing documents, as well as under relevant legislation; and
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes "matching", where we use personal data that a user has provided to search our Plan records to check whether that user is a member of the Plans, and where we collect further personal data from that user in the event of a "possible match".

We may transfer, store, or process your personal data outside of the UK. Where this is the case, any transfer of the Plans' personal data outside of the UK will comply with the requirements of data protection legislation. Such transfers will generally be made relying on UK adequacy regulations. Alternatively, they may be made using the UK's International Data Transfer Agreement or, where relevant, using the UK Addendum to the European Commission's standard contractual clauses, and where we consider that the protection for the data subject's personal data would not be "materially lower" after the transfer. You can find copies of the Agreement and Addendum [here](#). At present, the Trustee permits the offshoring of some administration services to the Philippines by WTW using the UK's International Data Transfer Agreement.

As the "data controller" in this context, the Trustee must process this information fairly and lawfully. We don't collect any personal data from you that we don't need.

Personal data relating to the Plans is held in paper form and on computer systems.

To run the Plans, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. This is known as "sensitive personal data" and under the legislation it includes information that relates to health, and also racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations. Our use of sensitive personal data would only relate to health matters and this information cannot be processed or passed to a third party without your explicit consent except where the legislation allows it (for example, in extreme circumstances such as a public health requirement), or the data is completely anonymous (for example, if all the benefits in the Plans were being secured with an insurer and the data was needed for underwriting purposes).

How long do 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 one of the Plans, their name and address, and details of benefits paid) for a minimum of six years. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction.

However, given the nature of pension schemes, the Trustee may be required to keep some of your personal data for the rest of your life, so that we have the information we need in order to pay benefits and to answer queries relating to your benefits.

We review the personal data held in relation to the Plans on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

Who do we share it with?

We're not allowed to share personal data about you with other organisations and people, unless we have your consent, or the law allows us to do so (for instance, if we have to comply with a legal obligation or in the unlikely event the data could help in detecting or preventing a crime, such as a fraud investigation). As we need to share information with others in order to provide your benefits, there is a legitimate interest in the Trustee sharing this information. We may also need to share it in order to meet contractual and other legal obligations.

We share personal data with the following people:

- the pensions managers, secretary to the Trustee and other employees of the sponsoring employers who provide support to the Plans and have access to the Plans' personal data,

- the companies within the Citi group who employ members of the Plans and / or make contributions on their behalf and their professional advisers as appropriate where directed by the sponsoring employers,
- the Plans' professional advisers, including the Plans' actuary, auditor, medical advisers, investment advisers and lawyers,
- the Plans' administrators, who are responsible for the day-to-day administration of the Plans on our behalf,
- the advisers and printers who help us prepare various communications we send to members,
- third parties that form part of the "dashboard ecosystem" that enables pensions dashboards services to work,
- our appointed insurance companies for the purposes of life insurance and additional voluntary contributions,
- our appointed annuity broker, which helps members choose annuity products at retirement,
- the provider we use to administer member-nominated Trustee Director elections,
- the company that takes the minutes of our Trustee meetings,
- organisations to whom we send Plans' personal data in order to effect a transfer via BACS (the Bankers' Automated Clearing Service), CHAPS (the Clearing House Automated Payment System) or Faster Payments in the UK and a payment via Western Union and the Plans' administrators' banking providers when pensions are being paid overseas,
- tracing agencies who assist the Trustee with updating the Plans' data from time to time,
- persons in connection with any investment changes, sale, merger, acquisition, disposal, reorganisation or similar change involving the Plans (including any counterparties, potential or actual purchaser and their advisers)

- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities; and
- such other Third Parties whose services we may require from time to time.

The Plan's actuary, auditor and (in certain circumstance) legal advisers are also data controllers in relation to your personal data. This means that they have to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. For more information about what personal data they hold about you and how they use it, please follow the links:

- our legal advisers, Sacker & Partners LLP – www.sackers.com/more/privacy-notice/pension-scheme-members-beneficiaries-and-clients-employees/
- our auditor, BDO LLP – www.bdo.co.uk/en-gb/microsites/privacy-notices/privacy-statement
- our actuary, Mercer Limited – www.mercer.com/en-gb/footer/mercerv-privacy-notice-relating-to-uk-actuarial-services

Your rights

You have certain rights to help you control your data, these are:

- you have the right to see personal data that is held about you and to have a copy provided to you, or someone else on your behalf, in a machine readable (digital) format,
- if at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected,
- you can require the Trustee to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved,

- you can object to your personal data being processed, although the Trustee can override this objection in specific instances (for example, where they have a legal obligation to process your data by keeping records of your benefits),
- where you have given us your consent to processing your personal data, you can withdraw that consent at any time (see “Who to contact” below),
- you can request that your personal data is deleted altogether (although in practice, this right is always subject to the Trustee being able to use your data for its legitimate interest, and without your data they would not be able to provide your Plan benefits); and
- you have the right to complain to the Trustee, 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 below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, the ability for you to build up benefits and our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustees can require you to pay a reasonable fee in certain circumstances (for example if you make repeated requests for the same data).

Who to contact about your personal data

If you wish to:

- see your personal data or exercise any of the rights mentioned above; or
- make a complaint about how we have handled your personal data,

please contact us at:

 CG Pension Trustees Ltd
c/o WTW
Sunderland SR43 4JU

Making a complaint

If you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to us by contacting the Plans’ administrator, WTW

 Citi.pensions@wtwco.com

 01737 227533

 WTW, Sunderland, SR43 4JU

You can also access our Data Protection Complaints Process here www.stepsforyourfuture.com/assets/Citi-Data-Protection-Complaints-Process.pdf.

If you are not satisfied with our response to your complaint, you can complain to the Information Commissioner’s Office whose helpline number is: **0303 123 1113**.