



## My Pension @ Aptia Mobile Application Privacy Policy / Notice

Aptia UK Limited (“Aptia”, “we”, “us”) is committed to safeguarding the privacy of individuals whose personal information are collected and use via My Pension @ Aptia Mobile Application (the “Application”).

This Privacy Notice (the “notice”) describes how your employer and Plan Trustee(s), acting as data controllers, collect and use personal information via My Pension @ Aptia Mobile Application.

My Pension @ Aptia Mobile Application is operated on behalf of the Plan Trustee(s) by Aptia acting as a data processor.

We are registered in England and Wales under company number 14923590 and have our registered office at 40-B, Tower 42, 25 Old Broad Street, London EC2N 1HQ.

By accessing, browsing, or using this Mobile Application, you acknowledge that you have read, understood, and accepted the practices described in this notice. Please read this notice carefully and be aware that we may change it at any time. As a result, we recommend that you check back regularly to this page to be apprised of any updates or changes. The date we last revised this notice can be found at the end of this document.

If you want to know more about how your employer and Plan Trustee(s) collect and process your personal information, please contact them directly or consult their own privacy notices.

To find out how we use personal information for other services and products, you can consult our dedicated privacy notices at <https://aptia-group.com/en-gb/privacy-notice>.

### 1. INFORMATION WE COLLECT ABOUT YOU

We will collect and process some or all of the following personal information about you:

(a) Information provided by you (or your employer and/or the Plan Trustee(s)):

- Name;
- Date of birth;
- Gender;
- Marital status;
- Beneficiary details (including name, date of birth and contact details of the beneficiary and their relationship to the Plan member);
- Contact details such as address, email address and telephone number;
- Employer name;
- Employment and pensionable service periods;
- Employee benefits;
- Salary;
- Nature and details of current and historic pension arrangements;
- Pension amounts and contributions;
- Bank details;
- National insurance number; and



- Such other personal information as is required to calculate the amount of benefits payable to you under the pensions Plan and to support the relevant pensions trustee in administering the Plan.

In some instances we will also process categories of sensitive personal information, such as health data and your sexual orientation (Special Category Personal Data). This Special Category Personal Data is not routinely collected by us, and will only be processed where it is necessary to do so in the circumstances (for example, where this impacts your retirement age, or where payment is claimed as a result of ill health).

#### (b) Our correspondence

If you contact us, we will typically keep a record of that correspondence.

#### (c) Website and communication usage / cookies

Details of your visits to our Mobile Application and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources you access. Information on how we handle this type of data can be found in our cookie notice.

Information collected on this Mobile Application will be used to:

- Verify your identity
- Set up security to enable you to access your personal information
- Administer your pension benefits
- Monitor the performance and usage of the Mobile Application. This includes collecting information about how visitors use our Mobile Application, for instance which screens visitors go to most often, and if they get an error message from our screens. We also record and count the number of visitors to the Mobile Application, all of which enables us to see how visitors use the application in order to improve the way that our application works.

Where you make changes to the personal information held on My Pension @ Aptia Mobile Application, where applicable those changes will also be passed to your employer's HR department to update your HR file.

## 2. WHO WE SHARE YOUR PERSONAL DATA WITH

Information may be disclosed to third parties where it is in the legitimate interests of the Plan Trustee(s), or the law requires.

From time to time, third parties may be appointed by the Plan Trustee(s) to process your personal information. Appropriate safeguards will be put in place to protect your personal information.

Additionally, Aptia may analyse your information together with information from other clients for data analytics purposes, including to create insights, reports and other analytics to better understand and improve the quality of and market Aptia advice, products and services. The output of such analytics does not identify particular individuals. For additional details on such analytics, you can visit our dedicated privacy notice related to data analytics [here](#).

## 3. HOW WE PROTECT YOUR PERSONAL INFORMATION

### Security over the internet

My Pensions@Aptia Mobile Application is maintained with technical, administrative, and physical safeguards to protect against loss, unauthorised access, destruction, misuse, modification, and improper disclosure. The personal information you enter on the application, including your user ID and passcode, are stored securely by Aptia on its data servers, and your passcode is encrypted in our database. However, no computer system or information can ever be fully protected against every possible hazard. Aptia is committed to providing reasonable



and appropriate security controls to protect this application and its information against foreseeable hazards. You must maintain the confidentiality of your user ID and passcode, and are responsible for restricting unauthorised access to your own devices.

All personal information that we hold is stored on our, or our third party suppliers', secure servers and only accessed and used subject to our security policies and standards.

#### Export outside the United Kingdom ("UK)/ European Economic Area ("EEA")

Your personal information may be accessed by staff, affiliates or suppliers in, transferred to, and/or stored at, a destination outside the UK and/or the EEA, whose data protection law may be of a lower standard than those in the UK/EEA. We will, in all circumstances, safeguard personal information as set out in this notice.

Where we transfer personal information from inside the UK and/or EEA to outside the UK/EEA, we are required to take specific measures to safeguard the relevant personal information. Certain countries outside the UK/EEA have been approved by the UK Government and/or the European Commission as providing essentially equivalent protections to UK/EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions (for the UK see the full list [here](#), for the EEA, see the full list [here](#)).

Please contact us as set out below if you would like to see a copy of the specific safeguards applied to the export of your personal information.

#### Storage Limitation

We will retain your personal information for as long as is necessary for the processing purpose(s) for which it was collected and any other permitted linked purpose (for example where we are required to retain personal information for longer than the purpose for which we originally collected it in order to comply with certain regulatory requirements). Our retention periods are based on business needs and your personal information that is no longer needed is either irreversibly anonymised (and the anonymised information is retained) or securely destroyed.

#### 4. YOUR RIGHTS

Under certain conditions, you have the right to require your employer and/or the Plan Trustee(s) to:

1. provide you with further details on the use of your personal information;
2. provide you with a copy of personal information that you have provided;
3. update any inaccuracies in the personal information held;
4. delete any personal information that they no longer have a lawful ground to use;
5. object to any processing that is justified on the "legitimate interests" ground unless the reasons for undertaking that processing outweigh any prejudice to your data protection rights;
6. object to direct marketing (including any profiling for such purposes); and
7. restrict how your personal information is used whilst your inquiry is considered,

and where processing is based on consent, you have the right to withdraw your consent by contacting us or as indicated when consent was given.

If you have any questions or concerns about how your personal information is handled, we recommend that you first contact your employer and/or the Plan Trustee(s). You can also exercise these rights by contacting us as set out in the "contacting us" section below. Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance



of legal privilege). If you exercise any of these rights, we will check your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your personal information or our response to any exercise of these rights, you have the right to complain to your local supervisory authority (eg. In the UK, to the Information Commissioner's Office.)

#### 5. CONTACTING US

If you have any question about how your personal information is handled, we recommend that you contact your employer and/or the Plan Trustee(s) in the first instance.

If you have any questions about this Notice or Aptia's privacy practices, you can contact us and our Data Protection Officer at [WebEnquiries@aptia-group.com](mailto:WebEnquiries@aptia-group.com) or by using our [contact form](#).

#### 6. CHANGES TO OUR PRIVACY NOTICE

We may change our notice from time to time in the future. If we change this notice, we will update the date the Privacy Notice was last changed below. If these changes are material, we will take reasonable steps to notify you of the changes.