

FUJITSU UK&I LIFE ASSURANCE SCHEME



DATA PRIVACY NOTICE

Who are we?

We are the Trustee of the Fujitsu UK&I Life Assurance Scheme (the **Trustees, we, or us**). We collect, hold and use personal information to help us run the Fujitsu UK&I Life Assurance Scheme (the **Scheme**).

Why are we writing to you?

This data protection notice explains how the Trustee uses your personal information. The Trustee is what is known as the "data controller" of the personal information we process about you in the context of the Scheme. This means that we decide how and why that personal information is used. Your privacy is important to us and we are committed to protecting and respecting your privacy. You can contact us by using the contact details provided in the "How to contact us?" section of this privacy notice.

Where can I get more information?

This notice is [available](#) in electronic format. We also provide printed versions (including large print versions) on request.

- ! **This notice explains how the Trustees process your personal information.** Please read this notice (and any other privacy information that we send to you) so that you are aware of how and why we are using your personal information.
- ! **We may change this notice from time to time.** Please contact us in order to receive the most up to date version of this notice. Our contact details are set out in the "How to contact us?" section.

SECTION ONE

ABOUT YOUR PERSONAL INFORMATION

What information do we collect and process?

We collect and process your personal information because you are or were a member or are or were connected to a member of the Scheme. We also collect personal information if you contact us in connection with your membership of the Scheme. We collect and process the following information about you:

- **personal contact details** – names, titles, addresses, telephone numbers and email addresses.
- **information about you** – dates of birth, gender, marital status, dependants and next of kin.
- **other information** – National Insurance numbers, payroll numbers, bank account details, tax status, salary, and employment information; and
- **benefits** – information about the life assurance benefits that you have accrued and death benefit nomination forms including Expression of Wish.

What sensitive personal information do we collect and process?

In some cases, we may also collect and process sensitive personal information (so called special category about you or the member of the Scheme. We usually only ask for sensitive personal information when it is required to help us make a decision in relation to your rights under the Scheme. For example, we may request:

- health information / medical records – we may ask you to provide health information related to your life assurance cover. In addition to receiving this information from you, we may receive medical information from third parties such as your doctor or a third-party occupational health provider; or
- other sensitive personal information – we may ask you to provide other sensitive personal information (e.g. information about your personal relationships or the health/disability information of a dependant) if it is relevant to help us decide on a dispute.

In addition, certain categories of sensitive personal information (e.g., race, ethnicity, religious beliefs, and sexual orientation) may be revealed on formal documentation that we process in order to identify the recipients of benefits under the Scheme (e.g., birth certificates, marriage certificates, driving licenses and passports). You may also decide to provide us with sensitive personal information voluntarily (e.g., when raising queries or making a complaint).

How do we collect your personal information?

When you join the Scheme, you and/or your employer provide personal details so that we can create your membership record.

This information is updated whilst you are a member of the Scheme. Further information may come from:

- you (e.g., if you get in touch to let us know a new address).
- your employer, Fujitsu Services Limited (e.g., updated salary and payroll information);
- other third parties (e.g., if you contact the Scheme's administrator to update your personal information or if HMRC provides us with information so that we can deduct the correct level of tax); and
- If you are a dependant or beneficiary of a member of the Scheme, then they will provide certain information about you to us.

Why do we process and retain your personal information?

We use this information to:

- manage your membership of the Scheme.
- send you information that is relevant to your membership of the Scheme.

- calculate, pay, and settle any benefits relating to your membership of the Scheme, including managing your Scheme benefits to your beneficiaries under the Scheme.
- comply with our legal and regulatory duties.
- help manage risks and liabilities in the Scheme.
- help the Scheme's sponsoring employers comply with their legal and regulatory duties.
- communicate with members with information about the Scheme; and
- improve our information and knowledge of such schemes generally.

What are our legal grounds for processing your personal information?

It is necessary to comply with our legal and regulatory obligations

As the Trustees of the Scheme, we are required to process your personal information in order to comply with relevant legislation, the Scheme's rules, court rulings and other tribunal/ombudsman decisions. For example:

- legislation sets out certain things the Trustees must do; and
- the Trustees are subject to fiduciary duties under trust law to act in line with the Scheme's governing documentation.

For our legitimate interests as Trustee of the Scheme,

Processing your personal information is also lawful if it is based on our 'legitimate interests'. The Trustees have a legitimate interest in running and managing the Scheme and its risks and liabilities (for example, communicating with you in relation to the Scheme, improving our processes and our use of technology and the general administration of the Scheme). In addition, certain third parties may have legitimate interests which require the processing of your personal information by the Trustees (e.g., your employer may need information in order to comply with regulatory requirements).

What are our legal grounds for processing your sensitive personal information?

There are three legal grounds that allow us to process your sensitive personal information:

- when we obtain **explicit consent** from you (e.g., when you sign one of the Scheme's forms which contains the appropriate consent wording); and
- when processing is **necessary** for reasons of substantial public interest (to the extent applicable).

What would happen if we did not collect and process your personal information?

If we did not collect and process your personal information, then:

- we would not be able to manage or administer the Scheme appropriately.
- we would not be able to pay the benefits to which you or a beneficiary is entitled under the Scheme; and
- we would be in breach of our legal and regulatory duties.

How long do we keep your personal information for?

The Scheme was set up to provide benefits over a very long time. The Trustees need to maintain records in order to properly run the Scheme, to determine who should receive what level of benefits and when they should receive them, and to respond to any disputes about an individual's rights under the Scheme.

As a result, the Trustees will generally keep your personal information for the lifetime of the Scheme plus 15 years from the date when no further benefits are payable to or in respect of you from the Scheme (the longest period of time during which someone can bring a claim against the Scheme). Our service providers (and former service providers) may also have valid grounds to keep your personal information for a similar period.

SECTION TWO

USING AND SHARING YOUR PERSONAL INFORMATION

How do we keep your personal information secure?

We use a range of measures to safeguard your personal information, in line with the requirements set out in the data protection legislation. These apply to both paper and electronic records. We also require our third-party service providers to give certain assurances and agree to contractual terms in respect of data protection and the security of your personal information.

What do we do with any personal information that is provided by third parties?

We receive personal information from sources other than directly from you. This includes information shared by your Scheme employer, the Scheme's insurer and administrator, its professional advisers, service providers and other relevant third parties.

When we receive this information, we add it to the information we already hold about you in order to help us make sure, that your details are as up to date and accurate as possible and so that we can manage your membership of the Scheme and the Scheme more generally.

Who do we share your personal information with?

For the purposes of administering and managing the Scheme, managing its risks and liabilities, and paying benefits under it, the Trustees may need to share your personal information with third parties. This will include your employer or former employer (e.g., the payroll, finance, compliance, audit, and HR teams). It will also include third parties who provide advice or services to the Trustees. These third parties may include actuaries, administrators, auditors, insurers, prospective insurers, lawyers, medical advisers, and any other such third parties as may be necessary for the operation of the Scheme and to enable the Trustees to carry out their duties.

Our suppliers and service providers who act as data processors must act in accordance with our instructions. Some of our suppliers and service providers also act as data controllers in respect of your personal information. We've set out a list of the key third parties with whom we currently share your personal information together with links to their data protection and privacy information (see page 12).

In some circumstances, we may have to disclose your personal information by law, because a court or the police or other law enforcement agency has asked us for it. We may also need to pass your personal information to or HM Revenue and Customs.

We may also share your personal data with the Scheme's employers (and professional advisers) to enable them to carry out activities in their legitimate interests (this is usually in connection with managing their business from a regulatory, HR or finance perspective).

SECTION THREE

YOUR RIGHTS AND WHO TO CONTACT

What rights do you have in respect of your personal information?

In certain circumstances, you have the following rights in respect of your personal information:

- the right to **object** to us processing your personal information.
- the right to request **access** to personal information relating to you.
- the right to request that we **correct any mistakes** in your personal information.
- rights in relation to **automated decision taking**.
- the right to request to **restrict or prevent processing** of your personal information.
- the right to request to have your personal information **transferred** to another data controller; and
- the right to request to have your personal information **deleted**.

Where we are relying on your consent to process personal information about you, you also have the right to withdraw your consent. We've set out more information about these rights in part two of the additional information starting on page 8.

You can exercise your data protection rights by contacting us at the details set out in the "How to contact us" section below.

What should you do if you have any questions or complaints?

You may be entitled to compensation for damage caused by breach of data protection legislation. If you do not think that we have processed your data in accordance with this notice, please contact us in the first instance (see 'How to contact us' below). If you are not satisfied, you can lodge a complaint with the Information Commissioner's Office. Information about how to do this is available on their website at www.ico.org.uk/concerns or by calling their helpline on 0303 123 1113.

How to contact us

Please contact us if you have any questions or concerns about this privacy notice or the information we hold about you, or if you would like to exercise your rights under data protection laws.

If you wish to contact us, please send an email to FujitsuHR@fujitsu.com or write to us at: Trustee of the Fujitsu UK&I Life Assurance Scheme, Fujitsu HR Department, Fujitsu Services, Timber Quay, 110-114 Strand Road, Derry, Londonderry, BT48 7NR.

Status of this privacy notice

This privacy policy was last updated in May 2024. We may make changes from time to time. Where we do, we will take appropriate steps to bring them to your attention.

FURTHER INFORMATION – PART ONE

MORE ABOUT HOW AND WHY WE PROCESS YOUR PERSONAL INFORMATION

CATEGORY OF PERSONAL INFORMATION	WHAT WE USE THIS INFORMATION FOR	LEGAL GROUND(S) FOR PROCESSING	WHERE WE GOT THIS INFORMATION FROM
Address	We use this information so that we can send you information that we are legally required to provide you with. In addition, we use this information to get in touch with you when we need to in order to run the Scheme. Finally, we use it to send you information that we think will be relevant to you as a member of the Scheme.	We have a legal obligation to send certain information to members of the Scheme. In addition, we may send additional information to fulfil our legitimate interest of running the Scheme.	<p>This information is initially provided by you or your employer when you joined the Scheme.</p> <p>Your employer may share updated information if you update your records with HR. In addition, you may have updated your information by contacting us or the Scheme's administrator.</p>
Telephone number			
Email address			
Name and title	We use this information to identify you and to create and update your membership record in the Scheme.	We have a legal obligation to pay the correct level of benefits to the correct individuals. This requires us to obtain and update this information.	If a member's details are not kept up to date, we may lose contact with that member. In these cases, we may use a third-party tracing agent to obtain up to date contact information.
Date of birth and your Scheme retirement date			
Gender			
Marital Status	We use this information to help us decide who should receive what benefits from the Scheme.	We also have a legal obligation to properly identify individuals who receive or may receive benefits from the Scheme.	
Dependants			
Next of kin			
National Insurance number	We use this information to identify you and to create and update your membership record in the Scheme. Your National Insurance number is also needed so that we can receive the correct information from HMRC and so that we can deduct the correct level of tax from your benefits.	<p>The Trustees are also required to comply with tax legislation and deduct the correct level of tax from benefits.</p> <p>Processing this information also fulfils the Trustee's legitimate interests in running and managing the Scheme.</p>	The Scheme's administrators may create a unique reference number so that your records can be easily identified.
Employment start and, if applicable, end dates			
Payroll number			
Scheme reference number			
Bank account details	We use this information in order to pay your benefits under the Scheme directly to you.		Your bank details provided by you when you fill in your membership form and when you update your details.
Tax status	We use this information to deduct the correct level of tax from your benefits.		Your tax status is provided to us by your Scheme employer and/or HMRC.
Salary details	We use this information to calculate the correct level of your benefits under the Scheme.		Your salary details are provided to us by your Scheme employer.
Details about your entitlement to benefits under the Scheme	We use this information to calculate the correct level of your benefits under the Scheme.		Details about your entitlement to life assurance benefits under the Scheme may be provided by your employer or may be determined by reference to the Scheme's governing documentation. In addition, the Scheme's insurers and administrators will carry out

			calculations, the results of which will be added to your record.
Death benefit nomination forms	We use this information as part of our decision-making process when deciding who will receive death benefits.	As Trustees of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time.	You provide us with the information that is contained on our death benefit nomination forms.
Medical information (Including medical records and doctors' opinions)	We use this information as part of our decision-making process when deciding ill health benefits under the Scheme.		Medical information relating to you may be provided directly by you, by the Scheme employer, your doctor or by a third-party providing health assessments / reports.
Information about your personal relationships	This information is used to determine who is entitled to benefits in relation to your membership of the Scheme.		This information is usually provided by you. In certain circumstances, we may also need to obtain information from relevant third parties.
Certified copies of official documents, including: • passport • driving license • birth certificate • marriage certificate • death certificate; and • decrees nisi / absolute.	This information is used to: • identify you • determine the status of your relationship • determine who may be entitled to benefits under the Scheme; and • trigger certain processes in respect of your benefits under the Scheme (e.g., payment of death benefits or splitting of benefits in cases of divorce).	As Trustees of the Scheme, we have a legal obligation to make decisions in line with trust law. This includes an obligation to take account of all the relevant facts and ignore all the irrelevant facts when making decisions and exercising discretions. We also have a legal obligation to pay the correct level of benefits to the right individuals at the right time. Certified copies of official documentation are sometimes essential for the Trustees to make legally valid decisions.	This information is usually provided directly by you or from your next of kin. In more unusual cases (e.g., when we are having difficulty locating a member or identifying their next of kin) publicly available official documentation may be obtained by a third-party tracing agent.

FURTHER INFORMATION – PART TWO

MORE ABOUT YOUR RIGHTS UNDER THE GDPR

As a data subject, you have a range of rights under data protection legislation. These rights are explained in more detail below. If you have any comments, concerns or complaints about our use of your personal information, please contact us directly.

You can email FujitsuHR@fujitsu.com or write to us at:

Trustee of the Fujitsu UK&I Life Assurance Scheme
Fujitsu HR Department,
Fujitsu Services,
Timber Quay
110-114 Strand Road
Derry
Londonderry
BT48 7NR

Right to object to our processing of your personal information

You may object to us processing your personal information where we are relying on a legitimate interest as our legal grounds for processing. Our legal grounds for processing are set out in section one of this data protection notice (see page 3) and part one of the further information (see page 7).

If you have the right to object to processing (i.e., for personal information that we process in order to fulfil our legitimate interests or the legitimate interests of a third party) **and** you exercise this right, we will no longer be able to process your personal information **unless** we can demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds as set out in section one of this data protection notice (see page 3) and in part one of the further information (see page 7).

! The key point to note is that, if we cannot continue to process your personal information, we would be unable to ensure that we are providing the correct level of benefits in respect of your membership of the Scheme. As we are legally required to pay the correct level of benefits to the right people at the right time, in these circumstances we may have to delay or even stop payments / requests until we have sufficient information.

Right to access personal data relating to you

You can ask us to confirm whether we are processing your personal information. If we are, you may ask us to provide the following:

- a copy of your personal information.
- details of the purpose for which your personal information is being, or is to be, processed.
- details of the recipients or classes of recipients to whom your personal information is, or might be, disclosed, including, if the recipient is based in a country outside of the European Union or the UK, what protections are in place in relation to the transfer to that recipient.
- the period for which your personal information is held (or the criteria we use to determine how long it is held);
- any information available about where we obtained your personal information; and
- confirmation as to whether we carry out any automated decision-making (including profiling) and, where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

Please make any request for your personal information in writing (see 'How can you contact us?' below). A copy of your request will be kept on your membership record. To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person if possible. If we cannot obtain consent, we may need to withhold that information or redact the data to remove the identity of that person if possible.

There are certain types of information which we are not obliged to disclose to you, which include personal information which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

Right to correct any mistakes in your information

You can require us to correct any mistakes (including adding missing information) in any of the personal information concerning you which we hold. Please contact us using the contact details set out in the "How can you contact us?" section.

Rights in relation to automated decision taking/making

The Trustees do not generally use automated decision making or profiling.

Right to request that we restrict the processing of your personal information

You may request that we restrict the processing of your personal information in any of the following circumstances:

- where you do not think that your personal information is accurate. In this case, we will start processing again once we have checked whether or not your personal information is accurate.
- where the processing is unlawful, but you do not want us to erase your information.
- where we no longer need the personal information for the purposes of our processing, but you need the information to establish, exercise or defend legal claims; or
- where you have objected to processing because you believe that your interests should override our legitimate interests. In this case, we will start processing again once we have checked whether or not our legitimate interests override your interests.

If our processing is restricted in any of the circumstances described above, we will inform you in advance if that restriction is to be lifted.

Right to request that we delete your personal information

You can ask us to delete your personal information where your personal information is being processed on a legal ground other than for complying with a legal obligation and:

- you believe that we no longer need to process it for the purposes set out in this privacy notice.
- you had given us consent to process it, but you withdraw that consent and there is no other legal ground upon which we can process it.
- you have successfully objected to our processing it; or
- it has been processed unlawfully or has not been erased when it should have been.

Right to request transfer of your personal information

You may, in specified circumstances, ask a data controller to provide you with an electronic copy of personal information that you have provided to it, or to have such a copy transmitted directly to another data controller.

Those circumstances do not, however, generally apply in relation our processing of your personal information in connection with the Scheme. This is because:

- our legal grounds for processing will not normally be that you have consented to the processing; and

- we do not carry out processing by automated means.

Right to withdraw consent

We usually only request your consent when we ask you for sensitive personal data. You have the right to withdraw any consent you have given us at any point.

However, as highlighted above, the Trustees only request sensitive personal data that is required to make decisions in respect of specific member benefits or complaints. If you withdraw your consent for us to process this information, we may have to delay or even stop payments / requests until we have sufficient information.

What will happen if your rights are breached?

You may be entitled to compensation for damage caused by breach of data protection legislation. If you do not think that we have processed your information in accordance with this notice, please contact us in the first instance.

If you are not satisfied, you can complain to the Information Commissioner's Office. Information about how to do this is available on their website at **www.ico.org.uk/concerns** or by calling their helpline on 0303 123 1113.

FURTHER INFORMATION – PART THREE

THIRD PARTIES AND TRANSFERS

For the purposes of administering the Scheme and paying benefits under it, the Trustees may need to share your personal information with certain third parties. This section lists the key third party service providers with whom we share your personal information.

ROLE	THIRD PARTY	USE OF PERSONAL DATA	OTHER INFORMATION (IF APPLICABLE)
Administrator	Fujitsu Services Limited	Fujitsu Services Limited uses personal data in order to run the Scheme and pay benefits to members and other beneficiaries. Fujitsu Services Limited also uses personal data in order to provide secretarial services to assist with the administration of the Scheme.	N/A
Legal advisers	Gowling WLG (UK) LLP	The Scheme's lawyer uses personal data in order to provide legal advice to the Trustee.	N/A
Auditor	Grant Thornton UK LLP	The Scheme's auditor uses personal data as part of its work auditing the Scheme's financial records and accounts.	N/A
Bank	Barclays	The Scheme's bank uses personal data in order to provide banking services to the Scheme.	N/A

Document control

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