

PRIVACY NOTICE

SYNGENTA UK PENSION FUND

1. Introduction

The Trustee of the Syngenta UK Pension Fund (the Trustee) is committed to protecting the privacy and security of the personal information of members and beneficiaries of the Fund. Please note that this notice is for your information only. You are not required to do anything in relation to it but we suggest that you print a copy and keep it in a safe place with your Syngenta UK Pension Fund information.

The Trustee is a data controller under the UK General Data Protection Regulation (UK GDPR). This means that we are responsible for deciding how we collect, hold, use and protect your personal information and we are required to give you certain information about how and why we do this.

This privacy notice describes how we collect, hold, use and protect personal information that relates to you or any individual connected to you, both during and after the period of time when you are a member or beneficiary of the Fund. We may update this notice from time to time. This privacy notice was last updated on 3 January 2024.

This notice explains the following:

- Section 2 – what personal information we may collect about you;
- Section 4 – what we may use your personal information for;
- Section 5 – how we keep your personal information safe including when we transfer it across borders;
- Section 6 – why we share your personal information;
- Section 7 – how long we retain your personal information;
- Section 8 – your rights regarding the personal information you provide to us;
- Section 9 – what happens if you do not provide us with your personal information;
- Section 10 – changes to our data protection arrangements; and
- Section 11 – how to contact us.

2. Personal information we may collect about you

Personal information means, broadly, information that identifies (or that could, with other information that we hold or are likely to hold, identify) a living individual. This could include any information provided to us in relation to your or another's actual, past or potential membership of the Fund.

We may hold any or all of the following personal information about you:

- personal details such as your name, gender, sex, age, date of birth, email address, postal address, telephone or mobile number, and identifiers such as National Insurance number and your employee number;

- documentary identifiers, such as information contained in or copies of passports, driving licences, birth certificates, gender recognition certificates (or their equivalent or replacement), marriage certificates, and other national documents, such as proofs of identity, residency, and employment;
- family, lifestyle and social circumstances such as details about your current relationship status and marital/relationship history and details of family, beneficiaries and dependents, including pension sharing order details;
- employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, Fund joining date, Fund retirement date, job title and job responsibilities;
- financial details such as income, salary, assets and investments (including investment choices, if applicable), bank account details to process pension payments, tax code, benefits, grants and insurance details; and
- technical information and other information about your visits to the online pension portal (the Fund administrator’s online administration site) if you have access to this – you can find more information about this below.

We may also hold other information about you which is known as ‘special category’ data and requires a higher level of protection – for example, information relating to your physical or mental health. Where we collect this type of information about you, we are permitted to use this information without your consent in accordance with paragraph (1) of Schedule 1 to the Data Protection Act 2018, on the grounds that the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment, social security or social protection. For example, we may collect certain personal information to meet our obligations set out by the Pensions Regulator. In exceptional occasions, we may also need to process this special category data for the establishment, exercise, or defence of legal claims or where there is a substantial public interest, such as in an occupational pensions’ context or preventing or detecting fraud (and other unlawful acts).

We collect your personal information when you, your employer, a member of the Fund or another person contacts us online, by phone, text, email, or post. We also obtain your personal information where this is provided through any other engagement or correspondence that you, your employer, a member of the Fund or another person may have with us. We may also collect personal information about you from other third parties including tracing agencies and from public sources, and third parties providing services to the Fund, such as insurers and administrators.

It is important that the personal information we hold about you is accurate and up-to-date. Please let us know if your personal information changes.

3. Technical information that we may collect about you

When you visit the Trustee’s webpage, we may collect technical information about you and your visit, such as the devices or technology used to access the webpage, the webpage response times, and length of your visit. You can find more information about the types of technical information that are collected in the [Cookie Policy](#).

When you visit the Fund administrator’s online administration site, which is called “myPension”, the Fund administrator may also collect technical information about your device, your internet protocol address (which is a number that can uniquely identify a specific device on the internet), your login information, browser type and version, browser plug-in types and versions and operating systems and platforms. Please refer to the Fund administrator’s cookie notice for further information.

4. What we may use your personal information for

The Trustee may use your personal information for the following purposes:

- to administer the Fund including to process data to calculate and pay benefits;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services;
- in relation to any correspondence related to the administration of the Fund (including queries relating to membership of the Fund, communications with nominated or appointed Trustees and communications when we are unable to contact members of the Fund);
- to notify you about our services and changes to our services;
- for statistical, financial modelling and reference purposes;
- for internal record keeping;
- to carry out risk management activities along with your employer, the Fund actuary and our advisers such as assessing employer risk, contingency planning and funding activities;
- ID verification;
- to comply with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
- to comply with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
- in connection with any sale, merger, acquisition, disposal, recognition or similar change involving the Fund;
- to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries;
- to process Trustee nominations;
- to analyse and improve the activities, services and information offered by our online pensions facilities (the Fund administrator's online administration site) or the Trustee website;
- in connection with the purchase of Fund investments such as 'buy-in' agreements with insurance companies;
- to help locate you if the Fund loses contact with you; and
- to invite you to the annual pensioner gathering and similar social events.

We use your personal information in the ways described above for one or more of the following reasons:

- (a) we need to comply with legal obligations to which we are subject. For example, we collect certain personal information to automatically enrol you into the scheme, or to provide personal information to HMRC where required by law; and/or

- (b) it is necessary in our legitimate interests (or those of a third party) to do so, and your interests and fundamental rights do not override those interests. For example, our legitimate interests may include:
- providing any clarification or assistance in response to your communications;
 - improving our service to you as a Fund member or beneficiary;
 - ensuring that you are aware of your benefits and entitlements;
 - complying with our record keeping duties;
 - ensuring that we pay the correct benefits at the correct time, including calculating these benefits;
 - managing the risks to the Fund so that we can help to make your pension safe;
 - ensuring that we comply with all laws, guidance and codes that apply to the Trustee and/or the Fund, as well as with data requests from regulators, governments, courts and law enforcement authorities;
 - minimising disruption to the Fund if there is ever a change to our business, including in connection with any valuation, sale, merger, acquisition, disposal or similar change involving the Fund; and
 - monitoring the way in which our website is used, to help us improve your experience on the website.

Where we hold your ‘special category data’, we use it for the reasons set out in section 2 above. We will only use your personal information for the purposes for which we collected it, unless we reasonably need to use it for a different reason that is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will explain the legal basis which allows us to do so.

5. Keeping your personal information safe

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Further information is available from www.syngenta.co.uk (see UK Pension Trustee at bottom of home page). We also have procedures in place to deal with any suspected data security breach, should one arise.

Transfers of your personal information

We may transfer or process your personal information at a destination outside the UK or European Economic Area (EEA). Where the countries to which your personal information is transferred are not formally recognised as providing an adequate level of protection for personal information under the laws of the UK or your home EEA jurisdiction (as applicable), we will transfer this personal information in accordance with applicable data protection laws.

This includes entering into data transfer agreements based on the standard data protection clauses approved by the UK Information Commissioner for transfers from the UK (available here), or standard contractual clauses approved by the European Commission for transfers from the EEA (available here), to ensure that the third parties to whom we transfer personal information commit to ensuring an adequate level of protection for your personal information.

In exceptional occasions, we may also need to transfer, store or process your personal information outside the UK or EEA, where the UK data protection clauses or the EU standard contractual clauses are not available.

We will only conduct these transfers where permitted under UK and EU data protection law – for example, where the transfer is necessary to establish or defend a legal claim.

Password security

Where we have given you (or where you have chosen) a password which enables you to access the Fund administrator's online administration site, you are responsible for keeping that password confidential. You should not share the password with anyone. The UK National Cyber Security Centre recommends making your password stronger by using three random words, and numbers/symbols if needed. Please avoid using the same password for multiple online accounts. If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security.

Unfortunately, the transmission of information via the internet or postal system is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the safety of your personal information transmitted to our website; any transmission is at your own risk. Once we have received your personal information, we will use reasonable procedures and security features to try to prevent unauthorised access.

6. Sharing your personal information

We may share or disclose your personal information to any of the following recipients:

- the sponsoring employers and the counterparties to the Fund's investments;
- our service providers and professional advisers such as the Fund's legal adviser, actuary, auditor and administrator;
- other third parties as required by law or responding to requests from (for example) local or foreign regulators, governments and law enforcement authorities; local and foreign courts, the Pensions Regulator, the Pensions Advisory Service, the Pensions Ombudsman, tribunals and arbitrators or other judicial committees;
- insurance companies (such as Generali and Phoenix Life Limited) and its reinsurers, and brokers (including annuity brokers);
- independent financial advisers in relation to a transfer of your benefits;
- other Fund members who might have information on your current whereabouts if the Fund loses contact with you (in this case, we would only share your name, your site location whilst you were an employee and the date you left employment);
- registered credit reference agencies; and
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving the Fund (including any potential or actual purchaser and their advisers).

If we share your personal information in this way, we require the transferee to implement appropriate security measures to protect your personal information and to treat it in accordance with the law. Except where the transferee is a data controller in its own right, we only permit the transferee to process your personal information in accordance with our instructions.

Some of the Fund's service providers such as the Fund's legal adviser, actuary, and auditor are also data controllers in relation to your personal information and have to comply with their own legal obligations,

industry codes and standards when processing your data. Information about where to find their data protection information can be obtained from the Secretary (contact details below).

7. How long do we retain your personal information?

If you are a member or beneficiary, we are required to keep accurate records of your entitlements under the scheme. This means that we will hold your personal information (and any personal information collected in respect of any individual connected with you) after you cease to be a member of the scheme or you or your beneficiaries cease to be entitled to benefits for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or regulatory and reporting requirements.

This period will depend on the type of data and the purpose for which it is held. For example, we may retain your personal information for a longer period in the event of a complaint or in relation to legal claims. Further information about retention periods in relation to specific types of personal information can be obtained from the Secretary (contact details below).

8. Your rights regarding the personal information you provide to us

You have the right, in accordance with the law (subject to certain restrictions):

- to request a copy of the personal information we hold about you, and to request information regarding the processing of your personal information (this is known as a ‘data subject access request’);
- to request the correction, completion and/or deletion of your personal information, or to request the restriction of processing of your personal information;
- in relation to personal information processed on the grounds of the legitimate interest of the Trustee or a third party, to object to the processing of your personal information; and
- to complain to your local data protection authority, or to a court of law, if your data protection rights are violated. You may be entitled to claim compensation as a result of any unlawful processing of your personal information. If you live in the UK, the data protection authority is the Information Commissioner.

There may be circumstances where we need to retain your personal information or are unable to

If you would like to exercise any of the rights described above, please let us know by emailing us at pensions.uk@syngenta.com or writing to us at Syngenta Pensions Trustee Limited, The Secretary, Bramley House, The Guildway, Old Portsmouth Road, Artington, Guildford, GU3 1LR, United Kingdom.

9. What if you do not provide us with your personal information?

We may not be able to perform the actions necessary to achieve the purposes set out above and you may not be able to make use of the services offered by us or to receive pension benefits if you do not provide us with personal information that we may need to comply with our statutory or contractual obligations, as set out in section 4 above. For example, we will be unable to calculate and pay your benefits if we do not have or are unable to process personal information in relation to your employment and financial details.

10. Changes to our data protection arrangements

From time to time, we may update this privacy notice and the data protection arrangements described above. If we make any substantial changes, we will seek to draw your attention to these changes. Any changes will take effect when we post the revised wording on our website. The date of the most recent revisions will appear on this page.

11. How to contact us

If you have any questions, comments or requests about this privacy notice, please contact the Secretary at:

Phone: +441344 424701

Email: pensions.uk@syngenta.com

The Trustee's contact details are: Syngenta Pensions Trustee Limited, Bramley House, The Guildway, Old Portsmouth Road, Artington, Guildford, GU3 1LR, United Kingdom.