



# KEEPING YOUR PERSONAL DATA SAFE

In this booklet you will find information regarding the Trustee's data privacy policy.

## Dear member

The Trustee holds personal data about you, your dependants and your fellow Plan members. It also shares this information with the advisers that support the Trustee in running the Plan. It must do this to be able to effectively manage the Plan and ultimately pay the right benefits to the right people at the right time. As a result, the Trustee has a responsibility to keep this information secure, something it is committed to achieving on an ongoing basis.

Recent changes to legislation surrounding the collection and use of personal data, comes into effect from 25 May 2018. The Trustee has therefore reviewed its policy regarding the storing of members' personal data. On the next few pages of this booklet you will find the Trustee's privacy notice. This is also available on the Plan website

**[www.HPRBP.com](http://www.HPRBP.com)**

As part of the Trustee's review of its data security policy, each of the Trustee's advisers has provided comprehensive information on the data held on behalf of the Plan. A list of the Trustee's advisers can be found in the latest version of the Trustee's Report and Financial Statements on the Plan website **[www.HPRBP.com](http://www.HPRBP.com)**

It is important that the information the Trustee holds about you is correct. You can see some of this information in the Equiniti 'My Pension' secure area of the Plan website. I would encourage you to login and review your data if you have not already accessed this area. If you have lost or forgotten your login details please call the Administration Team whose contact details can be found on the final page of this booklet.

I hope you find this booklet useful and take comfort in how important the Trustee takes the matter of your privacy and the need to keep your data safe. If you have any questions about the protection of your data please write to me c/o the HP Plan secretary, whose contact details are on the final page of this booklet.

Yours faithfully



**Paul Early**  
Chair of the Trustee  
Hewlett-Packard Limited  
Retirement Benefits Plan  
December 2022

# Your information

This notice sets out how we use personal information about members of the Hewlett-Packard Limited Retirement Benefits Plan and their dependants and nominated beneficiaries ("**you**").

We are the Trustees of the Hewlett-Packard Limited Retirement Benefits Plan (the "**Plan**"). We are committed to protecting your privacy and operate a strict policy in respect of your personal information. Further details are set out below.

This notice also applies to the Hewlett-Packard Limited Group Life Assurance Scheme (the "**Life Trust**") as well as the Plan, and references to the Plan in this document should also be considered to include the Life Trust where relevant. The Life Trust is the vehicle that provides death in service benefits for Plan members.

## 1. We need to use your information for administration of the Plan

We will use your information for the general administration of the Plan. This means we will use your information for the following purposes:

- To record your contributions, track entitlements and pay benefits.
- To communicate in relation to your contributions, entitlements and benefits.
- To obtain actuarial valuations and other professional advice.
- To deal with any complaints you might make.
- To conduct selections of new trustees.
- To meet our on-going regulatory and compliance obligations.
- To conduct statistical and reference exercises.

We carry out these obligations because we are under a legal duty to manage the Plan on behalf of the members.



## 2. We will also use your information for purposes connected with the Plan

We also use your information to carry out the following activities:

- (i) We will provide you with updates about the Plan, newsletters and flyers, and obtain your feedback about the operation of the Plan. We do this because we have a legitimate interest in keeping you up to date with developments affecting the Plan and to check we are running the Plan effectively. You can ask us to stop these communications as set out below.
- (ii) We will try to locate you if you move without providing us with new contact details. We do this as we have a legitimate interest in being able to contact you about the Plan and to pay your benefits.
- (iii) We will seek to confirm if you are still entitled to your benefits by confirming that you are still alive and that your dependants are still entitled to any benefits they receive. We do this as we have a legitimate interest in only paying benefits to those entitled to them.
- (iv) We disclose your information to third parties at your request, such as in relation to transfers to other schemes. We do this because you have consented to this disclosure.
- (v) We will use your information in order to prevent or detect crime. We do this because we have a legitimate interest in protecting the Plan from criminal activity. We will also disclose your information to third parties where we are required to disclose that information by law or by an order of the court.
- (vi) We will undertake activities from time to time to help us manage the liabilities of the Plan, such as obtaining life insurance, longevity hedging, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises. We do so because it is in our legitimate interests to ensure the Plan can continue to meet its liabilities.
- (vii) We will manage our internal systems processes and our use of technology, including testing and upgrading of systems, which may involve usage or transfer of personal data. We do this because we have a legitimate interest in ensuring that our systems and processes operate correctly and effectively.
- (viii) We will consider requests by you to access your benefits on the grounds of ill-health. This will require us to consider information about your medical condition. You will be asked to consent to this use at the time you ask us for those benefits.
- (ix) We will keep details of any beneficiary you nominate to receive your benefits. You will be asked to consent to this at the time you submit your nomination and also be asked to confirm that the beneficiary also consents to that use.

### 3. We collect a range of information about you to carry out these purposes

To carry out these purposes we hold and use the following information about you:

- Personal details such as your name, gender, date of birth, home address including postcode, national insurance number, bank account details, marital status, dependants and country of residence.
- Information relating to your benefits, including your member identifying number, the date you joined or left the Plan, your earnings, pensionable earnings, the category and value of contributions and benefits that you receive, your retirement age, and any relevant matters impacting your benefits such as additional voluntary contributions, pension sharing orders, tax protections or other adjustments.
- Health details in relation to any claim to ill health retirement or incapacity to manage your own affairs.
- Records of communications with you.
- In rare cases, information relating to convictions or offences to the extent they impact on the payment of benefits.

We will obtain some of this information from you. We also obtain information from your employer, former employer, other pension schemes, tracing agents and our medical advisers.

### 4. We need to disclose your information to third parties

To carry out these purposes we need to disclose your information to the following third parties:

- Service providers who use the information on our instructions. We use service providers to administer the Plan on our behalf, provide us with information technology services, archive our records, send mailings and run our payroll.
- Our professional advisers to obtain legal, actuarial, investment, covenant, audit and medical advice.
- Our providers of additional voluntary contributions.
- Tracing agents who locate missing members and confirm continuing entitlement to benefits.
- HM Revenue & Customs, the Department of Work & Pensions and regulatory bodies.
- The Pensions Ombudsman and The Pensions Advisory Services, where you have consented to that disclosure.
- Other members of the Hewlett-Packard group with a legitimate financial interest in the running of the Plan (for example, Hewlett-Packard Enterprise Company as the Guarantor for the Plan) and their professional advisers.
- Your employer or former employer.
- Insurance, reinsurance companies and independent financial advisers where we seek to manage the liabilities of the Plan.
- Third parties to whom you ask us to disclose your information, for example where you wish to transfer your pension.



## 5. Transfers of your information outside the European Union (EU)

If you are based outside the EU, we will transfer your information outside of the EU in order to pay you. In this case, we will also transfer your information outside the EU in order to trace you if we lose contact with you, and to confirm your continuing entitlement to benefits. We will also transfer your information outside the EU if you ask us to transfer your information to an overseas pensions provider. We do this because you have consented to this disclosure to allow us to make such overseas payments or because we have taken other measures to ensure that we continue to protect your information. Please contact us at the address set out below if you want more details.

## 6. Retention of your information

We keep your information for the longer of: (a) the period required in order to meet our legal or regulatory responsibilities, and (b) the period envisaged within our record retentions policy. We determine the period envisaged within the records retention policy with regard to the Plan's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Plan, and responding to legal claims or regulatory requests.

As a result, we will keep your information for different periods of time depending on the type of data and the purpose for which we are using it. In most cases, we will retain your information for 12 years after all entitlements to your benefits cease. Most information will be retained for 12 years after the death of a member and their nominated beneficiaries (if any), but in some cases we will keep personal information for a longer period (for example, where a member transfers out of the Scheme).

## 7. Your rights over your information

You have rights under data protection law to access and correct your information and (in some circumstances) to restrict its use or have it deleted.

You also have the right to object to the processing of your information in some circumstances, and to tell us that you do not wish to receive newsletters and flyers about the Plan.

You can exercise any of these rights by contacting us at the address set out below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent (primarily relating to sensitive personal data, as described in sections 2(viii) and (ix) above, although it also relates to certain disclosures of any personal data to third parties in accordance with your wishes, as described in section 2(iv) above - Withdrawal of consent will not affect our ability to process data for the other activities listed in section 2). You can notify us of your withdrawal of consent by contacting us at the address set out below. Where you withdraw your consent, this may mean we are unable to (if relevant): (a) process your ill health pension; and (b) store information about your stated beneficiaries (and in turn unable to carry out the actions anticipated by your expression of wish form); and/or (c) effect your requested transfer out of the Plan.

You can also lodge a complaint about our processing of your personal information with a supervisory authority in the Member State where you habitually reside or work, or where a breach has taken place. Details for the office of the Information Commissioner in the UK are available at [www.ico.org.uk](http://www.ico.org.uk)

## 8. Actuary

Aon Hewitt and the individual appointed as scheme actuary each act as “joint controllers”, and are each committed to protecting your information and acting in accordance with your rights under data protection law. The Trustee is a data controller independent of both Aon Hewitt and the scheme actuary and processes personal data differently and separately. The Trustee is not a “joint controller” with either Aon Hewitt or the scheme actuary. Aon Hewitt and the scheme actuary process personal information to fulfil the duty of care that scheme actuaries (or providers of actuarial services) are required to undertake under their appointment.

For information on how Aon Hewitt and the scheme actuary use and disclose your personal information, the legal bases for their use of information, and how to exercise your data protection rights in respect of their use of information, please see their privacy notice at [www.aonhewitt.co.uk/privacy-statement](http://www.aonhewitt.co.uk/privacy-statement)

You can also find out the name of the scheme actuary by checking the latest version of the Plan’s latest financial statements.

## 9. Other matters

This privacy notice was updated in May 2018. Please contact us if you want a copy of any earlier privacy notices. It is non-contractual. We reserve the right to amend it from time to time, and will take appropriate steps to bring any such amendments to your attention.

If you have any questions about the matters set out above, please contact:

✉ **HP Plan Secretary  
Inside Pensions**

Third Floor  
54-56 Victoria Street  
St Albans  
Hertfordshire  
AL1 3HZ

@ Or by email to:  
[HPPlan@InsidePensions.com](mailto:HPPlan@InsidePensions.com)

If you have any questions about administration or about your own benefits, please contact

✉ **Pension Administrator**

Equiniti  
Sutherland House  
Russell Way  
Crawley  
West Sussex  
RH10 1UH

@ Or by email to:  
[digital@equiniti.com](mailto:digital@equiniti.com)

