



# Compass Group Pension Plan Privacy Notice January 2024

# How we look after your data

The Trustee takes great care to ensure that your data held under the Plan remains secure and private. The UK General Data Protection Regulation and the Data Protection Act 2018 apply in the UK and the Trustee complies with these laws.

The Trustee is providing you with the following notice. This explains what personal information is collected, including how it is used and by whom. It also details your rights regarding your information, how it is secured, where it is stored and for how long.

## Compass Group Pension Plan Privacy Notice January 2024

Compass Group Pension Trustee Company Limited (the "Trustee", "we", "our", "us") is committed to protecting and respecting your privacy. This Privacy Notice explains the types of personal information we collect, how we use that information and who we share it with in order to properly manage and administer the Compass Group Pension Plan (the "Plan"), and also sets out how we protect that information.

Please read the following carefully to understand our views and practices regarding your personal information, and how we will treat it.

## Who we are

For the purposes of applicable data protection laws the controller is Compass Group Pension Trustee Company Limited, whose registered office is at Compass House, Guildford Street, Chertsey, Surrey, KT16 9BQ and its registered number is 02213339.

## Information covered by this Privacy Notice

This Privacy Notice covers all personal information collected and used by the Trustee. "Personal data" or "personal information" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised directly or indirectly. This may include the types of information set out below.

## What information do we collect from or about you?

The Trustee may collect information about you from the following sources to administer the Plan, your membership of it and the benefits payable under it:

### Information we receive from you

When you join the Plan or subsequently correspond with us, we will receive some or all of the following information:

- Personal details, such as name, date of birth, sex/gender (we use your sex to understand how long you are likely to receive your pension for, and gender as part of your addressee details if we write to you e.g. 'Mr, Mrs, Ms.'), postal address, email address, phone number, bank details, national insurance number, HM Revenue and Customs details and passport number;
- Family details, current marriage and partnerships and marital history, details of family, relations and dependants and if your benefits from the Plan form part of a divorce settlement, details of that settlement;
- Employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, attendance record, health and safety records, social security records, job title and job responsibilities, financial details such as income, salary and bank account details to process pension payments, benefits, discretionary awards, expressions of wish and insurance details.
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Plan.
- Some of the personal information you provide may be sensitive personal

### Information we collect about you:

- When you visit the Compass pensions website we may automatically collect the following information:
- Technical information, including your IP address, browser type and version, device identifier, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;
- Information about your visit, including the websites you visit before and after our website;
- Length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

### Information we receive from other sources:

We may receive information about you from third parties, for example, Compass Group PLC and its subsidiaries who are participating employers in the Plan ("Compass"), your current, former or prospective employer (if not Compass) or from anyone entitled to benefit under your membership of the Plan as well as your financial or pensions advisers. We might also collect information from your next of kin and other family members, from personal representatives or (with your consent) from registered medical practitioners. We might collect it from government departments such as HMRC and DWP; and from publicly accessible sources (e.g. the electoral roll) if we have lost touch and are trying to trace you.

We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Plan benefits.

- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state scheme.
- Correspondence that we may have received about you from your appointed independent financial adviser.

information, such as details about your health in the case of an application for an ill-health early retirement benefit, or details about personal relationships to determine who should receive benefits on your death. We may have information about gender reassignment, if you have a gender recognition certificate or have told us that you identify with a different gender from your birth sex.

## How do we use your personal information?

<p>We may use your personal information:</p>	<p>To administer and manage the Plan, including taking financial decisions and providing benefits under the Plan</p>	<p>To deal with any enquiries from you and correspond with you about the Plan, including any changes to our services</p>	<p>To conduct profiling, statistical and financial modelling</p>	<p>To analyse and improve the activities, services and information offered by the Compass Pension Plan website</p>	<p>For the purpose of keeping internal records</p>	<p>To comply with legal requirements, to establish and defend our legal rights, and to prevent and detect crimes such as fraud</p>	<p>In connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets by Compass</p>
<p>How do we use personal information for this purpose?</p>	<p>We will make investment decisions to provide the benefits under the Plan. These may include entering into contracts with third parties which require information about Plan members in order to make an investment (e.g. purchase of gilts to match pension benefit flows, buy-out of certain member benefits with an insurer, etc.). We will operate the pension plan over the course of its life which will require us to</p>	<p>We will need to use your personal information such as your contact details and information about your membership to communicate with you and assist with queries.</p>	<p>We may conduct profiling of the Plan membership in order to provide you with the information relevant to your specific circumstances, e.g. informing you of your retirement options when you are approaching your normal retirement date.</p>	<p>We may collect technical information, such as your IP address, operating system and platform or conduct surveys of your experience on our website.</p>	<p>We will keep records of your personal information, such as your name, national insurance number, records of your salary and details of your dependants in order to administer the Plan. We will also keep your contact details on record in case we need to provide you with any information on the Plan. We encourage you to keep your contact details and expressions of wishes up to date and to keep</p>	<p>We may need to process personal information to comply with legal requirements to which we are subject (e.g. the law may require us to consult with members from time to time).</p> <p>We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:</p> <ul style="list-style-type: none"> <li>• If you wish to transfer to an occupational</li> </ul>	<p>If the business (of any of the Compass companies) is reorganised and/or sold by way of a share sale or business transfer, we may need to share information in this context to ensure that the Plan is taken into account.</p>

<p>process individual data (e.g. calculating the pension each member may be entitled to at retirement).</p>				<p>us informed of any changes.</p>	<p>pension plan, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).</p> <ul style="list-style-type: none"> <li>• If you request a transfer to an overseas pension plan, we are legally obliged to check that you are</li> </ul>	
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						<p>resident in the same country as that plan. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.</p>	
<p>What is the legal basis for us processing your information in this way?</p>	<p>It is in our legitimate interest to use your personal information for the purposes of administering the Plan in order to pay each</p>	<p>It is in our legitimate interest to use your personal information for the purposes of administering the Plan in order to pay each</p>	<p>It is in our legitimate interest to use your personal information for the purposes of administering the Plan in order to pay each</p>	<p>It is in our legitimate interest to ensure that content on the website is presented in the most effective manner for you</p>	<p>It is in our legitimate interest to keep records of your personal details and any correspondence with you for the purpose of</p>	<p>We are required to process personal information for the purposes of complying with legal requirements to</p>	<p>It is in our legitimate interests, and those of Compass, for the Trustee to share personal information in this way in order</p>

	member's benefits.	member's benefits.	member's benefits.	and your computer for the purposes of administering the Plan.	administering the Plan.	which we are subject.	to facilitate the operation of the Plan.
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When the Trustee needs to use information about your health, they may ask for your consent. In these circumstances, you will be asked to complete a consent form. This will enable the Trustee to process your sensitive personal information for the purposes set out in the form. However, sometimes there may be reasons of public interest or law which enables the Trustee to use information about your health (or other very personal information such as details about personal relationships relevant to who should receive benefits on your death, or information on gender reassignment) without consent, and they will do so where that is necessary to run the Plan in a sensible way.

You can withdraw your consent at any time by using our contact details (below). This may affect what we can do for you unless we have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to us processing your health data for that, but then you withdraw that consent, we will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes, the Trustee needs to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.



## Who may use your personal information?

We may share your personal information with third parties, where it may be necessary to administer the Plan and/or comply with contractual obligations between the Trustee and third parties relating to administering the Plan and benefits under it or in connection with business transfers. We may share your personal information with the following third party organisations:

### The Plan's administrators

The Trustee has appointed XPS Administration as administrator for the Plan (please see below for details of the administrator for the CRISP section of the Plan). XPS Administration carries out the pensions administration services on behalf of the Trustee and will require access to your personal information in order to calculate and pay benefits under the Plan. It will also perform other activities such as responding to requests or complaints and providing information to members, and so will require access to your contact details. XPS Administration will process your personal information on our behalf as our data processor.

Specifically only if you are a member of the 'Compass Retirement Income Savings Plan (CRISP)' section of the Plan, Aviva Life & Pensions UK Limited will carry out all relevant administration roles on behalf of the Trustee. Their activities include calculating and paying benefits under the Plan, responding to requests or complaints, and providing information to members. They will require access to your personal data to provide these services on our behalf.

Together, XPS and Aviva will be referred to as the "Administrators" (XPS as administrators for the main Plan, and Aviva as administrators only for the CRISP section of the Plan).

### Third party service providers

In certain circumstances we may share your personal information with third party organisations such as insurance companies, actuaries, auditors and legal advisors who will be controllers in relation to your personal information (in addition, see 'The Plan actuary' below).

We may share your personal information with IT and data storage providers and other service providers such as mailing companies.

All such third parties act on our behalf as data processors. We ensure that your information is kept secure by checking that their security measures are adequate and by entering into agreements with such third parties which specify that they must only process personal information on our behalf and according to our instructions.

The Plan actuary is Matt Farraker of Mercer. In legal terms, the Trustee and the Plan actuary are joint controllers. The Plan Actuary is appointed by the Trustee to value the Plan benefits and carry out other calculations in relation to your Plan benefits. They will use your personal information for this purpose and they have a legitimate interest in doing so. The Plan Actuary will also use your personal information to comply with their own legal obligations and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers. This privacy notice and its description of how the Trustee uses your personal information applies equally to the Plan actuary's joint use of it. If you wish to exercise your rights under data protection laws in relation to our joint use of your information you should contact the Trustee, details below.

Any personal information held by us and any third party will be treated as confidential. We will not sell your personal information to third parties.

### Third parties permitted by law

In certain circumstances, we may be required to disclose or share your personal information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to HM Revenue and Customs, the Department for Work and Pensions, the Information Commissioner, the Pensions Regulator, the police, local or foreign regulators or to judicial or administrative authorities).

We may also disclose your personal information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, enforce our Terms of Use or protect your rights or those of the public.

### Third parties connected with business transfers

We may transfer your personal information to third parties in connection with a reorganisation, restructuring, merger, acquisition, sale or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.

Compass Group Holdings PLC as the sponsoring employer and other participating employers including members of our group of companies

Your personal information will only be shared with these entities to the extent that this is necessary for the administration of your pension benefits or in the context of a restructuring as mentioned in the column of the table above. They may also have a legitimate interest in contacting you about your benefits under the Plan, and any additional options which may be available to you in relation to those benefits. In such circumstances, we may share your personal information with these sponsoring employers so that they can contact you for that purpose.

If your benefits are transferred to another scheme, we will need to provide the provider, trustees, managers and/or administrators of that scheme with information about you.

The Trustee may need to share personal data with insurers in relation to purchasing and pricing up insurance contracts called 'annuities' (unless that can happen based on anonymised data). Insurers will use that data to verify the assets and liabilities of the Plan. The Trustee may write to you before purchasing an annuity to ask for up to date information about your spouse/partner/children/other dependants to this end.

The Trustee will share your personal data when we purchase the annuity and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). The Trustee will usually need to write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Plan membership ID number; marital status and details about spouse/partner; DOB; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement.

## Your rights

You have the legal right to request details of the personal information that we hold about you, to ask us to stop processing your information where you have previously consented to us doing so, to have it corrected or (in particular circumstances) deleted, and you have a right to object to our processing (in particular circumstances).

### Your right to access the information we hold about you

You can request access to the information we hold about you by contacting us using the contact details set out below. Our file of your information will usually be made available to you within 30 days, although occasionally we may not be able to give you access to the personal information we hold about you (for example, we may not be able to give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety). Please note that we may apply an administrative charge for providing access to your information in certain circumstances (although in most cases you can exercise your rights free of charge). Any such charge will be reasonable and we will advise you of the charge. Please note that if you request a copy of your data using electronic means (such as email), then we will provide a copy of your information in electronic form unless you ask us to do otherwise.

### Your right to have your information corrected or deleted

If any of the information we hold about you is inaccurate or out of date, such as the information included in your benefit statement, or you would like it deleted, please email your request to [pensions@compass-group.co.uk](mailto:pensions@compass-group.co.uk) and we will consider your request as soon as possible.

### Your right to object to us processing your personal information

You have the right to ask us to stop processing your personal information in certain circumstances. For instance, when we rely on legitimate interests as our lawful reason for processing. However, if you do so, we may be unable to properly administer the Plan or process any benefits for you and if we have compelling legal grounds to continue to process your personal information, we may continue to do so.

### Your right to have your personal information transmitted to another organisation

Where we hold personal information about you with your consent or for the purposes of your membership of the Plan, under certain circumstances you may have the right to ask us to provide you with the personal information we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that personal information to another organisation.

### Making a complaint

We would be happy to address any concerns you have directly and as a first port of call. Should you have a need to escalate your complaint, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe that we have not complied with applicable data protection laws. The address for the ICO is as follows:

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow,  
Cheshire SK9 5AF

The ICO's helpline: 0303 123 1113  
You can also contact the ICO through its website: <https://ico.org.uk>

## Where we store your personal information

The personal information that we collect from you may be transferred to, and stored at, a destination outside the United Kingdom ("UK") (for example, in Canada). It may also be processed by staff operating outside the UK who work for us, the Administrator or for one of our service providers. We will take all steps required by law to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws, including, where relevant, entering into appropriate UK transfer mechanisms (or equivalent measures) with the party outside the UK receiving the personal information. You can contact us for more details about these mechanisms for transfers and we will make them available to you.

## How long do we keep your personal information?

Your personal information is stored by us and/or our service providers strictly to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with applicable data protection laws. In the context of providing pension benefits, this period can be very long, and may continue for a period after you have left the Plan. When we no longer need to use your information, we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

## How do we keep your personal information secure?

Any personal information which is collected from the date this Privacy Notice comes into force will be collected via a secure server. The secure server software encrypts the information provided before transmitting it to us. Historically, your personal information may have been collected in hard copy (which may have been scanned into a secure system) and any such information is held securely in physical storage units with appropriate security restrictions, in line with data protection laws which require appropriate security measures to protect against damage, and unauthorised access to your personal information. As part of our security measures, we may sometimes require you to give proof of your identity before we disclose personal information to you.

## Changes to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any such changes (including when they will take effect) where that is required by law.

## Contacting us

If you have any questions or concerns about how we treat your personal information, you wish to ask us to stop processing your personal information (in particular circumstances), you would like to request a copy of the personal information we hold about you or exercise any other rights under data protection laws, please contact either the Trustee or the administrators using the following contact details:

### Trustee

Compass Group Pensions Department, Parklands Court, 24 Parklands, Birmingham B45 9PZ  
Tel: 07880 780803 or 07770 646675  
Email: [pensions@compass-group.co.uk](mailto:pensions@compass-group.co.uk)

### Administrators (other than for the CRISP Section of the Plan)

XPS Administration, PO Box 562 Middlesbrough TS1 9JA  
Tel: 01245 673502  
Email: [compassadminteam@xpsgroup.com](mailto:compassadminteam@xpsgroup.com)

### Administrators of the CRISP Section of the Plan

Aviva, PO Box 2282, Salisbury SP2 2HY  
Tel: 0345 600 6303

[Email: mymoney.questions@aviva.com](mailto:mymoney.questions@aviva.com)