

LEGAL & GENERAL PRIVACY NOTICE FOR MEMBERS OF THE AIRWAYS PENSION SCHEME

Dear Member of the Airways Pension Scheme

Protecting your personal information is extremely important. This is a copy of the Legal & General privacy policy, which sets out how your personal information is used and how it is protected. This is being provided as you are a member of the Airways Pension Scheme which shares data with Legal & General (the “**Insurer**”) for scheme risk management purposes, including the insurance of certain risks.

The way your data is used is not changing but this is being provided due to the new laws in effect from 25th May 2018. Due to this, companies that handle personal data are providing customers with more details on how they obtain, use and share this data as well as provide information on the rights you have on how this data is processed. You don’t need to take any action but you may wish to take time to read this.

For the purposes of the General Data Protection Regulation (“**GDPR**”), the Insurer will be a data controller in respect of your Personal Information, so this means they have a direct responsibility to the ICO to ensure it is kept safe and not misused

Glossary:

- General Data Protection Regulation (“**GDPR**”)
- Agent or adviser of the Trustee (“**Trustee Adviser**”)
- Information Commissioners Office (“**ICO**”)
- Longevity risks and related demographic risks – can impact the risk to the scheme in being able to pay benefits
- Reinsurers – help the Insurer manage the risk when it is very large or complex
- Retrocessionaires – Reinsurer of a reinsurer used when a risk is so complex or large that many reinsurers are required
- Outsource or Third Party Service providers – used when a third party is able to offer a service for better value or due to specialism

The Trustee and/or a Trustee Adviser may share or disclose any or all of the following Personal Information about you to the Insurer, Legal & General:

- (i) personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number and special category data (sensitive data) such as description of physical or mental health;
- (ii) family circumstances such as details about current marriage and partnerships and marital history, details of family and dependents;
- (iii) employment details such as pensionable pay, length of service, employment and career history and job title; and
- (iv) financial details such as income, salary and bank account details to process pension payments or benefits.

On receipt of your Personal Information the Insurer will use, analyse, store and maintain such Personal Information for a number of purposes including the following:

- (i) to provide quotations for de-risking the Scheme;
- (ii) to administer and support an insurance contract that the Trustee of the Scheme may purchase or has purchased with the Insurer to provide protection for Scheme member benefits; and
- (iii) to ensure that the Insurer accurately pays the correct benefits and claims to the appropriate Scheme members in connection with such insurance contract. In some cases the Insurer may use systems to make automated decisions (including profiling) based on the Personal Information it receives from the Trustee and/or a Trustee Adviser. Details of the Insurer’s automated decision making processes can be found at www.legalandgeneral.com/privacy-policy/

The Insurer may also share or disclose your Personal Information to any or all of the following categories of recipients in connection with the insurance of longevity risks and related demographic risks:

- (i) its group companies and group functions including those involved in setting Scheme specific mortality assumptions, financial reporting, legal and marketing;
- (ii) reinsurers of longevity risks and related demographic risks (a list of the Reinsurers that the Insurer customarily uses can be found at www.legalandgeneral.com/privacy-policy/consent-controllers/); and
- (iii) third party validation/verification providers for PEP’s/sanctions screening, tracing and existence checking or third parties instructed by the Trustee such as Scheme auditors.

The Insurer, Reinsurers and/or Third Party Service Providers will use, analyse, store and maintain your Personal Information for a number of purposes including:

- (i) assessing such Personal Information to prevent fraud;
- (ii) determining ongoing assumptions relating to the transaction being underwritten (analysis of the risk); and
- (iii) such other purposes as may be determined by them from time to time.

The Insurer, Reinsurers and/or Third Party Service Providers may further share your Personal Information with retrocessionaires or outsource providers, who will use, analyse, store and maintain your Personal Information for the same/similar purposes as those set out above.

Each of the categories of person listed above, including the Insurer, will rely on a condition under the GDPR known as “legitimate interests” to use your Personal Information for the purposes described in this Privacy Notice. Such persons consider it to be in their legitimate interests to collect your Personal Information as it provides the information needed to allow them to support de-risking including potential insurance of longevity risks and related demographic risks and to provide such services more effectively.

To provide you with marketing information about services and products that may be of interest to you we may also send marketing to you if we consider that there is a “legitimate interests” basis for doing so. We will not sell your data to third parties for them to market to you.

You may opt out of marketing at any time by e-mailing or telephoning your customer services team. Alternatively, you can also use the Contact Us section of our website at legalandgeneral.com/existing-customers/contact-us

The Personal Information that the Insurer obtains from the Trustee and/or a Trustee Adviser and shares and discloses as set out in this Privacy Notice may be transferred by the Insurer, Reinsurers, Third Party Service Providers, Retrocessionaires and/or Outsourcers to, and stored at, a destination outside the European Economic Area (“EEA”). Such persons will take all reasonably necessary steps to make sure that your Personal Information is treated securely and in accordance with this Privacy Notice. Such persons will only transfer your Personal Information to a recipient outside the EEA where they are permitted to do so by law (for instance:

- (i) where the transfer is based on standard data protection clauses adopted or approved by the European Commission;
- (ii) where the transfer is to a territory that is deemed adequate by the European Commission; or
- (iii) where the recipient is subject to an approved certification mechanism and the Personal Information is subject to appropriate safeguards, etc.).

The Insurer, Reinsurers, Third Party Service Providers, Retrocessionaires and Outsourcers will each keep your Personal Information in accordance with their internal retention policies. They will determine the length of time they keep it for based on the minimum retention periods required by law or regulation. They will only keep your Personal Information after this period if there’s a legitimate and provable business reason to do so. The Insurer’s policy is to delete or anonymise (so that it can no longer be identified as you) all Personal Information provided for the purpose of providing a quote for the insurance of longevity risks and related demographic risks usually for no more than six months after the date on which the Insurer was notified that such quote was not taken up or acted upon.

Fraud prevention

Legal & General will check your details with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We may also share information about you with other organisations and public bodies, including the police and we may check and/or file your details with fraud prevention agencies and databases.

Legal & General and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- (i) Checking details on applications for credit and credit related or other facilities.
- (ii) Managing credit and credit related accounts or facilities.
- (iii) Recovering debt.
- (iv) Checking details on proposals and claims for all types of insurance.
- (v) Checking details of job applicants and employees.

Legal & General and other organisations may access and use from other countries the information recorded by fraud prevention agencies. Please contact our Group Financial Crime department if you wish to receive the relevant details of the fraud prevention agencies:

Address: Group Financial Crime, 7th Floor, Brunel House, 2 Fitzalan Road, Cardiff CF24 0EB

Legal & General may also check the details of other parties related to your contract, including verification of identity. This includes beneficiaries, trustees, settlors, third party premium payers, executors or administrators of your estate, parties with power of attorney and any other beneficial owner.

Your rights

Please refer to this link www.legalandgeneral.com/privacy-policy/ for details on your rights.

You have rights under data protection law that relate to the way we process your personal data. More information on these rights can be found on the Information Commissioner's website. If you wish to exercise any these rights, please get in touch with your customer services team. Alternatively, you can also use the [Contact Us](#) section of our website.

Your Rights
1. The right to access the personal data that we hold about you.
2. The right to make us correct any inaccurate personal data we hold about you.
3. The right to make us erase any personal data we hold about you. This right will only apply where for example: <ul style="list-style-type: none">• We no longer need to use the personal data to achieve the purpose we collected it for• You withdraw your consent if we're using your personal data based on that consent• Where you object to the way we use your data, and there is no overriding legitimate interest
4. The right to restrict our processing of the personal data we hold about you. This right will only apply where for example: <ul style="list-style-type: none">• You dispute the accuracy of the personal data we hold• You would like your data erased, but we require to hold it in order to stop its processing• You have the right to require us to erase the personal data but would prefer that our processing is restricted instead• Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
5. The right to object to our processing of personal data we hold about you (including for the purposes of sending marketing materials to you).
6. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to make us transfer this personal data to another organisation.
7. The right to withdraw your consent, where we're relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

If you have any questions about this Privacy Notice or wish to exercise any of your rights, please get in touch with the Insurer's Data Protection Officer: **Name: Liz Gaspar E-mail address: Data.Protection@landg.com Address: Legal & General, 1 Coleman Street, London, EC2R 5AA.**

If you have any concerns about the way the Insurer processes your Personal Information, or are not happy with the way the Insurer has handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is: **First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.**