

HSBC Globetrotter Retirement Benefits Plan

HSBC International Managers Defined Contribution Retirement Benefits Scheme

Privacy Notice

Who we are

Independent Trustee Services Limited is the trustee (the “**Trustee**”) of the HSBC Globetrotter Retirement Benefits Plan and the HSBC International Managers Defined Contribution Retirement Benefits Scheme (the “**Schemes**”).

The Trustee of the Schemes holds certain personal information (known as “**personal data**”) about members of the Schemes and, where applicable, their dependants and beneficiaries. This is necessary for the Trustee to operate the Schemes and comply with its legal obligations. Most of the information held about you and processed by the Trustee in running the Schemes will be personal data.

This notice is being provided for your information – you do not need to take any action in response to it.

For legal purposes, the Trustee is known as the “**data controller**”, as it decides the purposes for and how the personal data it holds is processed.

What information we collect about you

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth
- your gender
- your marital status
- your address and other contact details (such as telephone number and email address)
- your national insurance number
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender)
- relevant employment information (including current and past salary information and employment dates)
- medical and other details about your health.

To properly administer the Schemes and to calculate and pay benefits, from time to time we may also need to hold other information about you.

How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you as it is needed to properly administer the Schemes and to calculate and pay benefits. The Trustee also keeps the above information to allow it to comply with its obligations towards members under the Schemes’ governing documents, as well as under relevant legislation. Your personal data will generally be collected directly from you or from your employer. Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Schemes, please ensure that those individuals are aware of the information contained within this notice.

Personal data relating to the Schemes is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

As part of running the Schemes, the Trustee may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “**special categories of personal data**”). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “special categories of personal data”.

We may process special categories of personal data:

- by seeking your explicit consent (and/or, where applicable, that of your dependants and beneficiaries). Where we have your consent and are relying on that consent to justify processing your personal data, you have the right to withdraw it at any time by notifying the trustee in writing. You do not have to give your consent and you have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing (where the Trustee is relying on your consent to justify its processing). However, if you do not give your consent, or subsequently withdraw your consent, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of certain benefits.
- by relying on the condition set out in relevant legislation permitting the processing of special categories of personal data in connection with employment, social security and social protection.
- where you have made the special category of personal data manifestly public.
- where the information is required to establish, exercise or defend legal claims.

What else we might do with personal data

The Trustee also may transfer data outside the UK where the Trustee’s advisers host data outside the UK. In those cases, we will ensure our arrangements with any relevant third parties are governed by data transfer agreements, designed to ensure that your data is protected on terms approved for this purpose by the UK’s Information Commissioner’s Office. You can ask for copies of these agreements at any time.

For example, the administration of the Schemes is currently carried out in the Isle of Man, a jurisdiction outside the UK which the UK’s Information Commissioner’s Office has recognised as providing an adequate level of data protection.

Who we share it with

As the Trustee needs help from various advisers to properly administer the Schemes, it shares personal data with the following:

- your current, past or future employer which may include group companies which are based outside the UK.
- the Schemes’ professional advisers, including the auditor, tax advisers, investment adviser/manager, lawyers and other similar external advisers or service providers (including Boal & Co).
- the third parties who are responsible for the day-to-day administration of the Schemes on behalf of the Trustee (including Zurich International Life Limited (Zurich) and Boal & Co).
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities.

Information about how these third parties process your personal data may be provided on the relevant third party’s website. If you require further information or would like to be provided with details of the relevant third party’s data protection contact, please contact Zurich (contact details provided below).

Zurich as the Schemes' defined contribution platform provider may also be a data controller in relation to your personal data. This means it has to comply with the requirements of data protection legislation, as well as relevant industry codes and standards, when processing your personal data. For more information about what personal data they hold about you and how they use it, please follow the link: <https://www.zurichinternational.com/im/legal/privacy>

Similarly HSBC, the Group in which the Principal Employer of the Schemes sits, may also be a separate data controller. Their Privacy Notice can be obtained by writing to the HSBC Data Protection Officer (DPO), Customer Service Centre, BX8 1HB, marking the request for the attention of the DPO.

How long we keep personal data for

The Trustee must keep all personal data safe and only hold it for as long as necessary. Given the long-term nature of pension schemes we consider it is necessary to hold your personal data for so long as you and any dependants are entitled to benefits under the Schemes and for an appropriate period after that, which reflects the potential for queries about your membership of the Schemes

However, we review the personal data held in relation to the Schemes on a regular basis in accordance with our data retention policy. The Trustee will not retain personal data for longer than is necessary, having regard to the purpose for which it is held. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

In order to enable us to meet our legal obligations, you should notify Zurich of any changes to your personal details (e.g. address or other contact details) as soon as possible.

Your rights

- **Right of Access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a machine readable (namely, digital) format.
- **Right to Rectification** – if at any point you believe that the personal data held about you is inaccurate or out-of-date, you can ask to have it corrected.
- **Right to Restrict processing** – you can require the Trustee to limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- **Right to object to processing** – as the Trustee is relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustees can override this objection in certain circumstances.
- **Withdrawing consent** – where you have given your consent to processing your personal data, you can withdraw that consent at any time by notifying the Trustee (see “Who to contact” below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.
- **Right to be forgotten** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.
- **Right to complain** – you have the right to complain to the Information Commissioner’s Office, or to bring an action before the court, if your personal data rights are not complied with.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Schemes, and/or the Trustee’s ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above
- request a hard copy of this notice
- make a complaint about how the Trustee has handled your personal data.

please contact Zurich using the details below.

Zurich Domestic Pensions Team

Phone: +44 (0)1624 691014

Email: domestic.pensions@zurich.com.

Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is the latest version as 31 July 2022. This notice will be updated from time to time and you can see the current version at any time on the Schemes' website at <https://www.zurichinternational.com/hsbc>. Alternatively, if you would prefer to receive a hard copy of the notice, please let us know (see "Who to contact" above).