

FAIR PROCESSING NOTICE

August 2019

Relating to the Cadbury Mondelez Pension Fund (the “Fund”)

In order to operate the Fund, the Fund’s Trustee maintains and processes certain ‘personal data’ about you (including your name, address, and date of birth). This fair processing notice provides you with some details of the information we hold, how we use it and your rights relating to it.

Who is the Fund’s Trustee?

Cadbury Mondelez Pension Trust Limited (the “Trustee” or “we”) is the Trustee of the Fund. We hold and process data, including personal data about Fund members and their beneficiaries.

How do we process the information?

The Trustee processes information including personal data to operate and administer the Fund under its governing Trust Deed & Rules and in accordance with relevant legislation, including that which is targeted at protecting your personal data, in order to calculate and pay benefits. Under the relevant Data Protection legislation we have a legitimate interest in processing personal data.

Personal data relating to you is held on paper and on computer systems. Under data protection legislation we are the ‘data controller’. Your employer within Mondelez, the Scheme Actuary and the Scheme Lawyer are also ‘data controllers’ for the purpose of operating the Fund. This means that we decide the purpose for and manner in which personal data is processed and we must treat your personal data fairly, transparently and in accordance with the law.

We must ensure that all personal data is kept safe and we maintain policies to ensure the security of the data at all times.

We must only retain personal data for as long as is necessary. Under UK law we must retain certain personal data on Fund members for a minimum of six years. However, due to the nature of pension funds we are likely to retain some of your personal data for your lifetime and beyond in order to be able to pay benefits and answer questions relating to them.

We maintain a data protection policy which requires us to review data from time to time and, if it is concluded that certain personal data is not required it will be securely destroyed.

Sharing your personal data

We are not allowed to disclose personal data about you to other organisations unless permitted by law or you have given your consent. As we have a legitimate interest in processing your personal data we are permitted to share your personal data with other organisations where this is required for the purpose of operating the Fund and providing your benefits. We may also need to share it to meet contractual and legal obligations.

What is ‘personal data’?

Personal data is any information from which you, as an individual, can be identified, or could be identified if processed in conjunction with other data in our possession.

The sort of personal data we process on you (and where necessary your beneficiaries) includes some or all of the following information:

- Name
- Date of birth
- Address
- National Insurance number
- Bank account details
- Salary and contribution information from your Mondelez employer

In certain circumstances, we may also be required to process particularly sensitive personal data, known as ‘special category data’, relating to you and/or your beneficiaries. This would include information relating to:

- Physical and mental health
- Racial or ethnic origin
- Political opinions/affiliations
- Religious or similar beliefs
- Sexual orientation
- Criminal records

We will only process this ‘special category data’ where it is necessary for the processing of your benefits and we will seek your consent to do so.

The organisations we share personal data with are as follows:

- Mondelez UK Holdings and Services Limited which performs the day to day administration of the Fund on our behalf
- Other companies within Mondelez, such as your employing company
- The Scheme Actuary, who is a joint data controller with the Trustee, but acts only on the instruction of the Trustee. As a joint data controller the Actuary also has a privacy notice which will be updated from time to time and can be accessed at: www.willistowerswatson.com/personal-data
- The Trustee's other professional advisers, including: the legal advisers, auditors and in some cases investment advisers
- Consultants and printing organisations which we use to assist with member communications, such as benefit statements and newsletters
- Insurance companies with which we have policies for purposes such as death in service benefits, annuities and additional voluntary contributions
- To date the Trustee has secured buy-in policies with the Pension Insurance Corporation and Rothesay Life. Below are links to the Fair Processing Notice of these organisations:
www.pensioncorporation.com/media/163127/privacy-notice-pic-buy-in-v3.pdf
www.rothesaylife.com/policyholder/data-protection
- Banks and other financial services providers for the purpose of arranging and making payment of benefits via BACS transfers into bank accounts
- Tracing agencies which we use in order to pay benefits
- Statutory bodies to which we have a legal obligation to share information, such as HM Revenue & Customs, the Pensions Regulator, the Pensions Ombudsman

We may need to share data with other organisations from time to time for the purpose of administering the Fund.

With the exception of the tracing agencies, the organisations with which we share your personal data will never contact you directly or pass on your personal data to another organisation, unless it is solely for the purpose of operating the Fund or administering benefits.

Except where permitted under legislation, we will not process your 'special category data' or share it with third parties without your explicit consent. This might be required under certain circumstances, such as applications for early retirement on the grounds of ill health.

The organisations with which we share personal data may, from time to time, request that data be processed outside of their UK operations. Where there is a legitimate reason for doing this we may agree to this on a case by case basis. Where data is transferred outside of the EU, we will only agree to the data transfer where we are satisfied that the organisation will take sufficient measures to protect any personal data to the same extent that they would need to under EU data protection laws. This means that as a minimum we would require the organisation to sign up to the EU standard contractual clauses for transfer of data outside of the EU.

What are your rights with regard to your personal data?

You have a number of rights, but be aware that following any of the below actions might affect the payment of your benefits and our ability to answer questions about your benefits. As we have a legitimate interest in processing your data, in certain circumstances we can override your request to object to processing of your data, withdrawal of your consent or the deletion of personal data.

You have the right to:

- See your personal data and have a digital copy provided to you
- Have your personal data corrected if you believe it is incorrect
- Request that we limit processing of your personal data, for example if its accuracy is being investigated
- Object to personal data being processed
- Request that your personal data is deleted entirely
- Where you have given consent, such as where 'special category data' needs to be processed for an ill health retirement application, you have the right to withdraw that consent in writing (to the email below)

We will respond to genuine requests for information free of charge. However, we retain the right to charge a reasonable fee in certain circumstances.

Making a complaint

If you are not satisfied with our response to any query, or you do not believe that we are processing your personal data fairly or lawfully, you can complain to the Information Commissioner's Office on 0303 123 1113. Further information can be found at the Information Commissioner's Office website www.ico.org.uk

Who to contact about your personal data?

If you have any questions about this notice, or if you wish to see your personal data or exercise any of your other rights relating to your personal data, or if you wish to make a complaint about the way in which we have processed your personal data, please contact the pensions team based in Bournville:

Phone: 0330 058 5505

Email: ukpensionsteam@mdlz.com

Accessing this notice

This notice will be updated from time to time and you will receive a hard copy in the post if any changes are made to it. If you want to request a copy at any time, please contact the pensions team using the contact details above.

The Trustee of the Cadbury Mondelez Pension Fund
August 2019