

## **PRIVACY NOTICE FOR THE COCA-COLA COMPANY PENSION AND ASSURANCE SCHEME (the “Scheme”)**

KO UK Pension Trustees Limited (the “Trustee”), as the trustee of the Scheme, holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

### **What we do with your data**

As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme and for other legitimate purposes relating to the operation of the Scheme, which include:

- calculating, administering and paying your benefits under the Scheme or following your death;
- processing ill-health retirement claims;
- dealing with any queries/complaints/appeals etc. regarding decisions we have made, for example in relation to your or your dependants’ entitlement to benefits under the Scheme;
- carrying out actuarial valuations and investment of the Scheme’s assets; and/or
- compliance with legal, regulatory and good governance obligations and as otherwise lawfully permitted from time to time.

The legal basis for doing so is in order for the Trustee to comply with its legal obligations.

Whilst much of the data we hold has been provided by you, we also hold and process data provided by third parties such as Coca-Cola Holdings (United Kingdom) Limited, the Scheme’s principal employer, Beverage Services Limited, a participating employer in the Scheme (together, the “Companies”), former participating employers, other pension schemes from which members have transferred, HMRC, the DWP and other regulatory bodies and tracing organisations. We also receive information from you about your proposed beneficiaries, who would be eligible to receive benefits on your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them.

### **What data is processed?**

The data we hold about you (and your beneficiaries) is to assist the Trustee in calculating, administering and paying benefits includes (but is not limited to):

- full name, age, gender, date of birth, national insurance number, passport or ID number, and or other governmental identification numbers;
- business and/or personal contact details, including address, telephone numbers and email addresses;
- financial information, including salary, tax information, pension or prospective pension entitlement, bank account details;
- employment details, including years of service, name of employer, dates of employment, full or part time employment status, job band, salary, compensation, employee claims, bonuses and benefits;
- pension scheme status, including start date and leave date of joining the Scheme;
- your preferences in relation to your pension benefits; and
- marital status and relationship data, including the full name, date of birth, contact details and relationship to your family members, dependants and/or beneficiaries.

We also hold and process some special categories or “sensitive” data about you for the purposes of administering the Scheme (for example medical records in relation to ill-health or death benefits) or under the Scheme’s Internal Dispute Resolution Procedure. We will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal

obligations in connection with employment (as allowed by legislation). There may also be occasions where we may seek your explicit consent. Where we are relying on your consent to process your sensitive data, you can withdraw it at any time.

### **Who else processes your data?**

We share your personal data with certain third parties involved in running the Scheme, for example, the Secretary to the Trustee (currently Inside Pensions), the Scheme's administrator (currently Mercer Limited ("Mercer")), the Scheme actuary and actuarial team (currently Allan McCrow and Mercer), the Trustee's legal advisers (currently CMS Cameron McKenna Nabarro Olswang LLP), the Scheme's independent professional trustee (currently The Law Debenture Pension Trust Corporation plc), the Scheme's auditor, life assurance providers, insurers (including Axa France Vie), reinsurance providers, investment managers, additional voluntary contributions providers, independent financial advisers, medical advisers, tracing organisations, communications providers, HMRC, DWP, the Pensions Regulator, the Pensions Ombudsman and the Pensions Advisory Service.

In addition, we make your personal data available to the Companies and any other employers associated with the Companies, including The Coca-Cola Company and The Coca-Cola Export Corporation, or to companies and firms which are considering or have acquired one or both of the Companies or the whole or part of the Companies' business, or the trustee(s), administrators or professional advisers of any pension scheme to or from which your rights under the Scheme may be, are being or have been transferred, or to any company participating in such a pension scheme.

Your personal data will also be released to other external parties if authorised by you, or as required or permitted by law, or to comply with a judicial proceeding, court order, request from the Pensions Regulator, Pensions Ombudsman or any other regulator or any other legal process served on or involving the Trustee.

In some circumstances responsibility for your personal data is shared with third parties including the Scheme Actuary and the Trustee's legal advisers (who process your data to comply with their professional duties as advisors to the Trustee), insurers (including Axa France Vie), auditors and the Companies. The Companies hold and process your data to comply with their legal obligations as the employers of the Scheme. The Companies have a legitimate interest in the Scheme being run in a cost-efficient way and process your data to offer certain options to members.

The Trustee, the Companies, Mercer and other advisers from time to time transfer Scheme personal data to other countries, including outside the European Economic Area. In particular, the Trustee and the Companies transfer personal data to The Coca-Cola Company, incorporated in the United States of America, and the ultimate parent company of each of the Companies. Where transfers are made outside the European Economic Area, the parties involved will ensure that adequate safeguards are in place. Mercer transfer Scheme personal data to its outsourcing centre in India, and may transfer data to its data centre facilities in the USA, UK, Australia and Canada. Where these transfers are made Mercer have in place a framework recognised by the relevant authorities or courts as providing an adequate level of protection, including but not limited to binding corporate rules, model clauses and the EU-US privacy shield framework. Details of these safeguards can be provided on request.

### **Storage of your personal data**

Pension benefits can be paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until after your membership of the Scheme ends.

Once your membership ends, we will decide whether delete some of the data held in relation to you after 6 years. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits that arise after that time.

Mercer will hold on to your data for up to 15 years after the termination of its contract with the Trustee. This is to protect themselves against any subsequent legal claims.

### **Your rights**

You have the right to obtain access to, or copies of, your personal data and, request that we rectify any errors in the data that we hold, or request that we erase your personal data. You can also ask that we restrict the way we process your personal data or object to its processing. In some circumstances, you have a right to request a copy of your personal data for the purposes of transmitting elsewhere. You can exercise these rights by contacting the Trustee at KO UK Pension Trustees Limited, c/o Mercer Limited, Attn: The Coca-Cola Company Pension and Assurance Scheme Administration Team, Westgate House, 52 Westgate, Chichester PO19 3HE, [ChrmscteamE@mercer.com](mailto:ChrmscteamE@mercer.com) or 01243 532000.

Please notify us as soon as possible if there has been a change in your details (for example if your personal circumstances such as your nominated beneficiary or home address change).

Where we have requested and obtained your consent to process particular information, you can request to withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we will not be able to pay out the benefits you are entitled to.

### **Contact details**

If you want to know more about the information held by the Trustee, the purposes for which it is held or about the Scheme's data protection arrangements, please contact the Trustee as follows:

KO UK Pension Trustees Limited, c/o Mercer Limited, Attn: The Coca-Cola Company Pension and Assurance Scheme Administration Team, Westgate House, 52 Westgate, Chichester PO19 3HE

Email: [ChrmscteamE@mercer.com](mailto:ChrmscteamE@mercer.com)

Telephone: 01243 532000

### **What if you have a complaint?**

If you are not satisfied with how we have handled your personal data you can send your complaint to the Trustee using the details as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. This is in addition to and separate from the Scheme's internal dispute resolution policy. Its contact details are:

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

Telephone number: 0303 123 1113 or 01625 545 700

Alternative methods of contacting the Information Commissioner's Office can be found on its website at: [www.ico.org.uk/global/contact-us/](http://www.ico.org.uk/global/contact-us/)

The Trustee reserves the right to amend this privacy notice from time to time.

July 2020