



## Chevron UK Pension Plan

### GDPR-compliant Privacy Statement

#### **Data protection privacy notice – how we use your personal data**

##### **Who we are**

Chevron UK Pension Trustee Limited is the trustee (“the Trustee”) of the Chevron UK Pension Plan (the “Plan”).

As the Trustee of the Plan, we hold certain personal information (known as “personal data”) about Plan members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustee in running the Plan will be personal data (in other words, it is information from which you as an individual can be identified).

For legal purposes, the Trustee is known as the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

In certain circumstances, the Plan’s professional advisers may also be data controllers, such as the Plan Actuary and Willis Towers Watson, who have provided further details which may be found at [www.willistowerswatson.com/personal-data](http://www.willistowerswatson.com/personal-data).

##### **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, date of birth, gender and marital status
- your address and other contact details
- your national insurance number
- details about your pension benefits
- details about your remuneration and employment, including your current and previous salary information, employment dates and details of your working hours
- details of your bank account (to pay benefits)
- details about your dependants and/or beneficiaries and your marital status, including their names, gender, relationship to you and dependency criteria (where provided)
- medical and other details about your health.

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

##### **How we gather and store your personal information**

Your personal data will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser. If you are receiving a dependant’s benefit from the Scheme, or a benefit resulting from divorce or the dissolution of a civil

partnership, we may have been given your personal data by the member or through enquiries undertaken by us on a member's death.

Personal data relating to the Plan is held on paper and on computer systems.

### **How and why we use that information**

We need to use your personal information to manage your pension scheme membership and calculate and pay benefits from the Plan.

Most of the processing we do is to ensure that we comply with our obligations under the Plan's governing documents, as well as under relevant legislation. In other cases, the Trustee has a legitimate interest in holding and processing the above information as it is needed for us to properly administer the Plan and to calculate and pay benefits.

As part of running the Plan, we may also need to hold and process sensitive information about you and/or your dependants and beneficiaries (known as "sensitive personal data"). Under the legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as "sensitive personal data". Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

As some of the Trustee directors are based in the US, the Trustee may need to transfer your personal information to the US. In addition, as the Trustee directors use Chevron Group devices and information security structures to communicate, your personal information may be stored and processed in the US or any other country in which Chevron or its subsidiaries, affiliates or joint ventures maintain facilities. As part of the Chevron group of companies, the Trustee has appropriate safeguards in place to ensure your data is kept secure when it is transferred outside the EEA. You can request details of these safeguards (see "Who to contact" below).

### **Who we share it with**

As the Trustee needs help from various advisers to properly administer the Plan, we share personal data with the following:

- Chevron's Total Remuneration team, which provides support to the Trustee and enables the Trustee to operate smoothly and effectively
- your current, past or future employer or other companies within the Chevron group, which may include group companies which are based outside the EEA (where data is sent outside the EEA, appropriate safeguards are put in place to ensure that your data is kept secure)
- the third parties who provide services to Chevron relating to the sponsorship of the Plan, including Willis Towers Watson, who provide actuarial services to the Chevron to assist with assessing and providing financial support to the Plan (to ensure potential conflicts of interest are managed appropriately, separate teams at Willis Towers Watson support the Trustee and Chevron) and Chevron's auditor, who assist Chevron in complying with its legal responsibilities relating to its sponsorship of the Plan
- the third parties who are responsible for the day-to-day administration of the Plan on behalf of the Trustee, Barnett Waddingham
- the Plan's professional advisers, including:
  - the Plan actuary, Colin Smith of Willis Towers Watson

- the Plan's actuarial and investment advisers, Willis Towers Watson
- the Plan's auditor, PWC
- the Plan's legal advisers, Sacker & Partners LLP
- Chevron Health & Medical Group and other occupational health and medical advisers, who provide support to the Trustee when it considers ill-health benefits
- the Plan's AVC/DC provider, Fidelity International
- Equitable Life, which holds certain Plan member investment policies
- Paragon Service Point UK who help us print various communications we send to you, such as the Plan newsletters
- Equiniti ICS Limited, the Plan's payroll provider
- the Electoral Reform Service, who help the Trustee run the member nominated trustee elections
- 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
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK and/or a payment via the administrators' banking providers when pensions are being paid overseas

### **How long we keep personal data for**

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Plan, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the long-term nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life and for an appropriate period after that to reflect the potential for pension queries and complaints.

However, we review the personal data held in relation to the Plan on a regular basis in accordance with our data retention schedule. If we conclude that certain personal data is no longer needed, that personal data will generally be destroyed.

### **Your rights**

- 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
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected

- 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
- You can object to your personal data being processed where we are relying on have a legitimate interest to use it, although the Trustee can override this objection in specific instances
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact” below). However, withdrawing your consent will not affect how we used any of your personal data beforehand and it may be possible for us to continue to use it where we can justify continued use
- You can request that your personal data is deleted altogether, although the Trustee can override this objection in specific instances.

You should be aware that taking any of the above steps could impact on the payment of your benefits and/or your participation in the Plan, and/or our 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 we have handled your personal data

please contact the Chevron UK Pension Plan administration team by calling 0344 264 3587 or by emailing [chevron@barnett-waddingham.co.uk](mailto:chevron@barnett-waddingham.co.uk).

You may also contact Chevron Data Privacy Officer (Europe), Simon Owens, on [privacy@chevron.com](mailto:privacy@chevron.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 statement**

This statement is the latest version as at 10 June 2019. This notice will be updated from time to time, for example, to reflect changes to the Plan’s personal data flows and data protection law and guidance from the Information Commissioner’s Office. You can access the current version at any time on this webpage or by request (see “Who to contact” above).

**As at 10 June 2019**