

# T-Mobile International UK Pension Scheme

## Privacy Notice

### 1. Introduction

The Trustee of the T-Mobile International UK Pension Scheme ('the Scheme') needs to hold some personal information relating to you in order to administer your pension and/or death benefits payable from the Scheme.

The Trustee is committed to protecting your personal information.

This Notice sets out important information about how it collects and uses your personal data. Similarly, other parties involved in running the Scheme will sometimes need to make decisions jointly with the Trustee. These include the Scheme Actuary and Willis Towers Watson Limited. Together these other parties are 'the Trustee Advisers'. See the 'Scope' section below for more on this.

You should read this notice carefully and raise any questions that you may have with the Trustee by emailing [TMobile.admin@Barnett-Waddingham.co.uk](mailto:TMobile.admin@Barnett-Waddingham.co.uk).

### 2. Scope

This Notice applies to members and beneficiaries of the Scheme.

The Trustee of the Scheme, T-Mobile International UK Pension Trustee Limited ('the Trustee') (of Orion House, Bessemer Road, Welwyn Garden City, Hertfordshire AL7 1HH), is a controller in respect of the information which it holds about you.

Other parties involved in running the Scheme may also need to collect and use information about you to carry out their functions. This includes the Scheme Actuary who, together with Willis Towers Watson Limited, will also be a controller for these purposes. In legal terms, the Trustee and the Trustee Advisers are joint controllers in respect of the information they hold about you. The Trustee and the Trustee Advisers are required to tell you how they use it, and who to contact if you wish to exercise your rights under data protection laws in relation to the joint use they make of it.

The Scheme Actuary is appointed by the Trustee to value the Scheme benefits and carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. The Scheme Actuary will also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers. Willis Towers Watson Limited has also issued a privacy notice on behalf of itself and the Scheme Actuary on the joint use it makes of your personal data. The privacy notice can be accessed via the following link: <https://www.wtwco.com/en-gb/notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees>

Willis Towers Watson Limited may make changes to its privacy notice from time to time so you should check the latest version of their privacy notice on a regular basis. The Trustee takes your privacy very seriously and it asks that you read Willis Towers Watson Limited's privacy notice carefully as it contains important information.

The information collected and used regularly by the Scheme Actuary and Willis Towers Watson Limited will most likely relate to members of the defined benefit section of the Scheme. However, the Scheme Actuary and Willis Towers Watson Limited may also have had access to Scheme-wide information which may also relate to former members of the historic defined contribution section. The Trustee therefore

strongly suggests that all Scheme members take the opportunity to read Willis Towers Watson Limited's privacy notice.

Sometimes, your information may be used by the Trustee and the Scheme Actuary for statistical research, but only in a form that no longer identifies you.

In some circumstances the Scheme Actuary may also be able to fulfil the purpose mentioned above using information which the Trustee have anonymised before sharing with them.

Except where stated otherwise, reference to 'the Trustee' shall mean the Trustee acting as joint controller with the Scheme Actuary and Willis Towers Watson Limited in relation to your personal information.

### 3. What personal data does the Trustee collect?

Personal data means information which identifies you and relates to you as an individual. The Trustee of the Scheme collects, uses and stores your personal data for a wide variety of reasons in connection with the administration of your pension benefits.

It may collect and process the following data about you:

- Your personal details such as name, sex/gender (we use sex to understand how long you are likely to receive your pension for and gender as part of your addressee details if we write to you e.g. 'Mr., Mrs., Ms. '), date of birth, national insurance number and bank account information (where benefits are in payment).
- Contact details, including address, email address and phone number.
- If your benefits from the scheme derive from your employment, details of your employer when you were building up benefits in the scheme, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the scheme form part of a divorce settlement, details of that settlement.
- Details of any contributions paid by you or on your behalf to the Scheme.
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Scheme.
- Correspondence received about you from HMRC, relating to periods of service when you may have been contracted out of the upper tier of the state pension.
- Correspondence that we may have received about you from your appointed independent financial adviser.

You may give it this information by phone, in writing, by email or in person or by completing forms either in writing and/or electronically.

The Trustee may sometimes use other information about you. This could include information about your health, where it is relevant to, for example, early payment of benefits from the Scheme, or details about

personal relationships to determine who should receive benefits on your death. It may have information about gender reassignment, if you have a gender recognition certificate or have told us that you identify with a different gender from your birth sex. We may also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of scheme benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an 'employment link'. This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statement (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

The list set out above is not exhaustive, and there may be other personal data which the Trustee collects, stores and uses in the context of administering your pension benefits. The Trustee will update this Notice from time to time to reflect any notable changes in the categories of personal data which it processes.

#### 4. Where the Trustee gets your personal data from

Some of the information the Trustee has comes directly from you. In addition, Barnett Waddingham, who administers the Scheme on the Trustee's behalf, may have obtained information about you and passed it to the Trustee. The Trustee may, in turn, pass information about you to the Scheme's other advisers, brokers and insurers or may instruct the administrator to do so. The Trustee is the source of the personal data which the Scheme's advisers, the Trustee Advisers, brokers and insurers have about you.

Sometimes the Trustee gets information from other sources: for example, from your Scheme employer (for information such as salary and length of service); from another scheme if you have transferred benefits from that scheme; from governmental departments such as HMRC and DWP; and from publicly accessible sources (e.g. the electoral roll) if the Trustee has lost touch with you and is trying to find you. The Trustee may in turn pass this information to the Scheme's advisers, the Trustee Advisers, brokers and insurers.

If the Trustee asks you for other information in the future (for example about your health), it will explain whether you have a choice about providing it and the consequences for you if you do not do so.

#### 5. How does the Trustee use your personal data?

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to the running of the Scheme.

The Trustee will use your personal data to comply with these legal obligations, to establish and defend its legal rights and to prevent and detect crimes such as fraud. The Trustee may need to share your personal data with other people for this reason, such as courts and law enforcement agencies.

The Trustee also has a legitimate interest in properly administering the Scheme. This includes paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of scheme governance are met (including standards set out in the Pensions Regulator guidance).

## 6. What Sensitive data does the Trustee keep?

Certain categories of personal data are considered 'sensitive personal data' and are subject to additional safeguards.

The Trustee may need to use information about your health (or other very personal information, such as details about personal relationships relevant to who should receive benefits on your death, or information on gender reassignment) which would be classed as sensitive personal data.

If the Trustee needs to use this type of information it may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustee to use this information without consent and it will do so where that is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting the Trustee using the contact details given below. This may affect what the Trustee can do for you, unless the Trustee has another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to the Trustee processing your health data for that, but then you withdraw that consent, the Trustee will usually be unable to consider your application. If you withdraw consent after our processing, this will not retrospectively affect the processing that has already happened.

Sometimes the Trustee needs to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

## 7. When does the Trustee share personal data?

The Trustee will share personal data with other parties only in limited circumstances and where this is necessary for the administration of your pension benefits or to comply with a legal obligation as follows:

- The Trustee Advisers.
- Accountants, lawyers and other professional advisers and service providers (including but not exhaustively services such as actuarial services, risk management, legal advice and defined benefit investment and administration management).
- Management staff of Deutsche Telekom (UK) Ltd, its successors or its ultimate parent company (Deutsche Telekom AG).
- HM Revenue and Customs.
- The Pensions Ombudsman.
- The Pensions Regulator.
- The Information Commissioner.
- Any new trustees.
- IT and data storage providers and other service providers, such as printers who help the Trustee to prepare communications to members, and tracking and tracing services.
- If your benefits are transferred to another scheme or pension arrangement, the Trustee may need to provide the Trustee or administrators of that scheme or arrangement with information about you.

The Trustee may also be required to disclose your personal information in response to requests from a government agency, court, tribunal, ombudsman or regulator or for other purposes related to a dispute process.

In the majority of cases, your personal data is shared under the terms of a written agreement between the Trustee and the third party which includes appropriate security measures to protect the personal data in line with this Notice and our obligations. The third parties are permitted to use the personal data only for the purposes which are identified, and not for their own purposes, and they are not permitted to further share the data without the Trustee's express permission.

The Trustee may also share personal data in response to requests from third parties such as banks, mortgage lenders, independent financial advisors, lawyers, actuaries, accountants and other third parties where it has a lawful basis to do so.

The Scheme's employers may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustee may share your personal information with the employers so that they can contact you for that purpose.

The Trustee may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Scheme.

In all cases, where personal data is transferred from the UK to a country which is deemed not to have an adequate level of protection for personal data as determined by the Information Commissioner in conjunction with the Secretary of State, the Trustee will put in place additional steps to protect the personal data. These include:

- The personal information is transferred at the request and with the consent of the Scheme member in relation to his/her/their own benefits (or those of a dependent or beneficiary, as appropriate).
- An appropriate standard contractual clauses contract along with UK international addendum, or alternatively the UK's international data transfer agreement, put in place with the third party/parties to whom the personal information will be transferred, containing appropriate safeguards in relation to it.
- The transfer is governed by the 'data bridge' between the UK and the US (as appropriate).
- The transfer is within a group of companies who have obtained Binding Corporate Rules.

If you have any questions about the transfer of your personal data in these circumstances, including how to obtain copies of any safeguards we put in place, please email [TMobile.admin@Barnett-Waddingham.co.uk](mailto:TMobile.admin@Barnett-Waddingham.co.uk)

#### 8. For how long will my personal data be retained?

The Trustee needs to keep some of your personal information long enough to make sure that it can satisfy its legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

The Trustee keeps your information for long enough to ensure that, if a query arises in the future about your benefits, it has enough information to deal with it where it has a legal obligation to do so. To meet this aim, the Trustee will keep your information for 75 years from the end of the Scheme Year in which you transfer out of the Scheme or the last payment is made to or in respect of you.

## 9. What are my rights in relation to my personal data?

Some of the people we mention above just use your personal information in the way we tell them. However, others (including the Trustee Advisers) may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as independent controllers in their own right. In this case, they are subject to the same legal obligations as us in relation to this information and the rights you have in relation to your information apply to them too.

If you want any more information from the Trustee Advisers or any of these recipients, including those who are separate independent controllers, or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

The Trustee will always seek to process your personal data in accordance with its obligations and your rights.

In certain circumstances, you have the right to seek the erasure or correction of your personal data, to object to particular aspects of how your data is processed, and otherwise to seek the restriction of the processing of your personal data. You also have the right to request the transfer of your personal data to another party in a commonly used format and the right not to be subject to automated decision-making including profiling where it produces legal or other significant effects on you. If you have any questions about these rights, please email [Tmobile.admin@Barnett-Waddingham.co.uk](mailto:Tmobile.admin@Barnett-Waddingham.co.uk).

You have a separate right of access to your personal data processed by the Trustee. You may be asked for information to confirm your identity and/or to assist the Trustee to locate the data you are seeking as part of the Trustee's response to your request. If you wish to exercise your right of access you should email [Tmobile.admin@Barnett-Waddingham.co.uk](mailto:Tmobile.admin@Barnett-Waddingham.co.uk).

You can exercise all of these rights free of charge except in some very limited circumstances, and these will be explained to you where they are relevant.

The Trustee has agreed with each of the Trustee Advisers that the Trustee will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this Notice. This means if you wish to exercise rights against the Trustee and the Trustee Advisers for what they do jointly with your personal information, you should contact the Trustee, via the administrators, using the details above.

Finally, you have the right to raise any concerns about how your personal data is being processed with the Information Commissioner's Office ('the ICO') using the following contact details:

ICO helpline

Telephone: 0303 123 1113.

Website: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## 10. Where can I get further information?

If you want more information about what we do with your information and what your rights are, please contact the Trustee via the Scheme administrator at: [TMobile.admin@Barnett-Waddingham.co.uk](mailto:TMobile.admin@Barnett-Waddingham.co.uk).

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