

The Nortel Networks UK Pension Plan (the Plan)

Privacy Notice

This notice explains how Nortel Networks UK Pension Trust Limited, the Trustee of the Plan, uses and protects the personal information that it holds about members and other beneficiaries of the Plan.

The Trustee is a "controller" for the purposes of the data protection laws. The current data protection laws are set out in the Data Protection Act 1998. These will be replaced by new data protection laws with effect from 25 May 2018. We refer to both the current and the new data protection laws as the "Data Protection Laws" in this privacy notice.

You should share this notice with your family and dependants where you have provided us with personal information about them.

What is personal information?

Personal information broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual. This includes any information provided to us by or on behalf of you, the Plan's former employers or HM Revenue & Customs in relation to your membership of the Plan.

What types of personal information might we hold about you?

We collect and process the information about you that you provide by filling in forms and by corresponding with us and our service providers by telephone, email or otherwise. We also collect and process information about you that is provided to us by HM Revenue & Customs or was previously provided to us by the Plan's former employers.

We may hold and process any or all of the following personal information about you:

- personal details such as your name, gender, age, date of birth, contact details (e.g. your address and postcode, email, telephone and mobile numbers), and identifiers such as your National Insurance number, pension or member reference number and employee number (where applicable);
- details of your family, lifestyle and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants;
- employment details such as your earnings, length of service, employment and career history, recruitment and termination details, absence record, job title and job responsibilities;
- other financial details such as any other income, other pension arrangements, bank account details (e.g. to process pension payments) and your tax code; and
- information about your physical or mental health (where there is a legal basis for the processing of such data under the Data Protection Laws – see below).

Why do we hold this information?

We hold this information because we need it to administer the Plan. Without your personal information, we cannot provide you and your dependants with the correct benefits, at the right time. For example, we may need this information to verify your membership of the Plan, to calculate your pension or to assess whether you are entitled to a specific benefit or how the tax rules apply to you.

We may use unique identifier information, such as your National Insurance number, passport number, pension or member reference number (where applicable) for the purposes of sending communications to you and verifying your identity.

In some instances, we may need to hold and process information relating to your physical or mental health. We will ask for your explicit consent to this, unless there is an alternative legal basis for processing this information under the Data Protection Laws. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

Using your information in accordance with Data Protection Laws

Data Protection Laws require us to meet certain conditions before we are allowed to use your personal information in the way described in this privacy notice.

We rely on a condition that allows us to use your personal information to comply with our legal obligations in relation to the Plan. We also rely on a condition known as 'legitimate interests' in order to use this information in the way described in this privacy notice. We have legitimate interests in collecting and processing your personal information as we need this to administer the Plan and to provide benefits for you and your dependants.

We will keep the amount of personal information collected and the extent of any processing to a minimum.

We will only process 'sensitive' or 'special categories' of personal information under the Data Protection Laws (e.g. information about your health) where you have explicitly consented to this or where there is an alternative legal basis for processing this information under the Data Protection Laws. This may mean that you will be asked to sign consent forms in the future. If you don't consent to our processing this information when asked to do so, it may mean that we are unable to pay benefits to you or your dependants. Once you have given your consent, you can withdraw it at any time by writing to us using the contact details below.

What do we do with the information?

We may use your personal information for a number of purposes relating to the administration of the Plan, including the following:

- to calculate and pay benefits. This includes providing you with details of your benefits and options under the Plan and dealing with any queries that you have about these;
- to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with the information, benefits and services that you request from us;
- to notify you about services provided to members of the Plan and any changes to those services or to enable you to access those services;
- for statistical, financial modelling, funding, accounting and reference purposes;
- for internal record keeping;
- for risk management purposes, including the insurance or management of risks or of the Plan's benefits;

- complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes; or
- complying with demands or requests made by any relevant regulators, government departments and law enforcement or tax authorities or in connection with any disputes or litigation.

How long do we keep your information for?

We will hold your personal information on our systems for as long as is necessary for the Plan to provide benefits to you or your dependants.

So, for example, if your pension is paid from the Plan when you retire, we will hold your information for the rest of your life, until your pension ceases on your death. If a pension is payable to any of your dependants after your death, we will then continue to hold your information until their pensions cease. We will then continue to hold your information for an indefinite period after all benefits payable to you and your dependants have ceased, in case there are any further queries about your membership of the Plan.

If you cease to be a member of the Plan, we will hold your information whilst you are a member and then for an indefinite period after you cease to be a member, in case any further queries arise about your membership of the Plan.

Who do we share the information with?

Where appropriate for the purposes of administering the Plan, we may share your information with:

- the Plan's administrator, Willis Towers Watson. The administrator uses the information to administer the Plan, including to calculate and pay benefits;
- the Plan's secretariat, Capita;
- the Plan's professional advisers and auditors. This includes the Plan's actuary, Neil Mobbs and his employer Willis Towers Watson, the firm that provides actuarial and consultancy advice to the Trustee (a link to Willis Towers Watson's own privacy notice can be found here: www.willistowerswatson.com/personal-data). It also includes the Plan's legal advisers Pinsent Masons LLP and Travers Smith, investment advisers, Mercer and auditors Grant Thornton UK LLP. These organisations use the information when advising the Trustee and carrying out their respective professional obligations.
- the Plan's insurers and annuity providers (and other insurers or brokers for the purpose of obtaining quotations relating to the Plan or its benefits), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the Trustee to advise you about your options under the Plan or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Plan;
- any other person who is authorised to act on your behalf;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies; and
- any relevant ombudsman, dispute resolution body or the courts.

The entities listed above may also share personal data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services.

Some of these entities may also be controllers under the Data Protection Laws. However, in the first instance you should contact the Trustee using the contact details below if you have any queries about how they use your personal information.

Please note that some of the Plan's former service providers may continue to hold information about you for their own record keeping purposes once they have ceased to be involved with the Plan.

Where we store your personal data

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to respond to any queries that you may have. Where this applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

Data may also be transferred outside the UK or the EEA where the Plan's service providers host data outside the UK or the EEA. These transfers will be governed by the Data Protection Laws.

Your rights in relation to your personal information

The accuracy of the information that we hold about you is important to us. If any of the information that we hold is inaccurate or out of date, please let us know using the contact details set out at the end of this notice.

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, namely:

- to access your data;
- to have your data rectified if it is inaccurate or incomplete;
- in certain circumstances, to have your data deleted or removed;
- in certain circumstances, to restrict the processing of your data; and
- to claim compensation for damages caused by a breach of the Data Protection Laws.

If you wish to exercise any of these rights, please let us know using the contact details set out at the end of this notice.

We will aim to respond to any request received from you within one month from your request. Access to your data will usually be provided free of charge, although in certain circumstances we may make a small charge where entitled to do so under the Data Protection Laws.

Please note that we may be unable to delete or remove your data whilst we still need this to administer the Plan – see the section 'How long do we keep information for?' above.

Any complaints?

If you are not happy with the way in which your personal information is held or processed, please contact us using the details below. You also have the right to complain about data protection matters to the Information Commissioner's Office (ICO).

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113.

Changes to this privacy notice

This privacy notice is current as at 16 May 2018.

We keep our privacy notice under regular review, and may change it at any time. We will tell you about any significant changes.

Contact us

If you have any queries about this privacy notice, or wish to exercise any of the rights above, please contact the Plan administrator, Willis Towers Watson, via telephone (01707 607601) or at the following address: PO Box 545 Redhill Surrey RH1 1YX

If you have any other questions about the Plan, please contact the Trustee using the contact details below:

Nortel Networks UK Pension Trust Limited
c/o Towers Watson Limited
PO Box 545
Redhill
Surrey RH1 1YX

Dated **16 May 2018**