

Hilton UK Pension Plan: Privacy Notice

The Trustee of the Hilton UK Pension Plan (the “Plan”, “we”, “our” or “us”) is a data controller for the purposes of applicable data protection law and is committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on the personal information about you the Plan collects, what we do with this information, the lawful basis on which personal information is processed and the rights you have.

Other data controllers, including the Scheme Actuary, the Scheme Auditor and the Plan’s legal adviser will need access to some of that information from time to time in order to:

- assess how well funded the Plan is;
- assist in calculating benefits;
- ensure that the Plan’s finances are in order and the correct benefits are being paid out; and
- provide legal advice on individual cases.

Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone number, e-mail address, national insurance number, identity document(s), bank account details (in some cases), and country of residence;
- information relating to your benefits such as your member identifying number (which is assigned to you by the Plan), the date you joined or left the Plan, your earnings, the category and value of benefits that you have built up or receive, and relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments; and
- in some cases, special categories of personal data such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you) or your biometric data (if you choose to use the ID-Pal mobile app or similar solution that we offer for identity verification when you claim your pension scheme benefits).

For further details of the information that we process about you, please contact HUKPP@hymans.co.uk.

Where applicable, we also collect information about your dependants or next of kin. You should provide a copy of this notice to those individuals at the time of nomination (if you are willing to disclose the fact of their nomination to them at that time). We shall provide them with a copy of this notice at the time that a benefit becomes payable to them.

In some cases, we will collect personal information about you indirectly from your (current or former) Plan employer and from our service providers (e.g. the Plan administrator, which is Hymans Robertson at present, and our provider of identity verification solutions, which is ID-Pal at present).

How we use your information

The main purposes for which we use your information are listed below:

- (a) communicating with you in relation to your benefits, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;
- (b) for general administration of the Plan, such as: to record and pay benefits and for other administrative activities that may become necessary from time to time (like member tracing and identity verification) should we happen to lose contact with you and/or to prevent fraud;
- (c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime; and
- (d) when we undertake activities from time to time to help us manage the liabilities of the Plan, such as longevity hedging, insuring Plan liabilities with an insurer, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

For further information regarding the purposes for which your information is processed, please contact

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (d) above, and (when we make disclosures to your (current or former) Plan employer for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of that entity, such interests in each case not being overridden by your privacy interests;
- (ii) in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies referred to below;
- (iii) in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing, exercising or defending legal claims, or where the processing relates to personal data manifestly in the public domain; or
- (iv) processed with your consent in those limited circumstances when one of the other justifications described above is not available. For example, we rely on explicit consent to process the biometric and other information you choose to provide using the ID-Pal mobile app to verify your identity when you claim your pension scheme benefits.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to administer your benefits or record or calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

We typically share your information with the following recipients:

- our suppliers, such as our administrators (Hymans Robertson at present), and other providers of services to us and them including financial advisers (to provide you with financial advice),

payroll providers (to record and pay benefits), providers of printing, communication, IT and hosting, marketing, and tracing services (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);

- your (current or former) Plan employer, such as for audit purposes, or in relation to corporate transactions initiated by that entity;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (d) above;
- public authorities, Her Majesty's Revenue and Customs (HMRC), regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- other persons (such as the Pensions Regulator or the Pensions Ombudsman) from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

If you would like further information regarding the potential recipients of your information, please contact HUKPP@hymans.co.uk.

Transfers of your information abroad

The use and disclosure of your information for the purpose referred to in (b) above may involve transferring your information to countries outside of the European Economic Area and/or the UK. Those countries include the USA.

In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected in compliance with applicable data protection rules. To ensure an appropriate level of protection, we typically use a data transfer agreement in the appropriate standard form approved for this purpose by the relevant data protection authority, such as the one entered into with Hilton Worldwide Holdings Inc in relation to processing carried out in the US. Further details of these transfers and copies of these agreements are available from us on request.

Retention of your information

We will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within any record retention documentation in place. We determine the period envisaged within such documentation with regard to the Plan's operational and legal requirements. In general, we will keep your information for the life of the Plan plus 8 years. If you choose to use the ID-Pal mobile app to verify your identity, copies of your identity documents and biometric data will be deleted from the ID-Pal system after 32 days.

Your rights

You have the right to be informed about the information that we hold about you, and to receive a copy of that information.

You also have the right to object to our processing of your personal information in certain circumstances and to request its rectification or erasure.

Where we rely on consent to process your personal information you may withdraw that consent at any time (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

If you have any questions or wish to exercise any of the above rights, you may send an email to HUKPP@hymans.co.uk. You can also use this e-mail address if you wish to make a complaint about how we process your information.

You can also lodge a complaint about our processing of your personal information with the Information Commissioner's Office (www.ico.org.uk) or, if you are no longer resident in the UK, the relevant data protection authority in your country of residence.

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was last reviewed on 19 May 2022.

It may be subject to amendments. Any future material changes or additions to the processing of personal data as described above in this privacy notice affecting you will be communicated to you through an appropriate channel.

If you require further details or information, then please contact HUKPP@hymans.co.uk.

Hilton UK Pension Trustee Limited as the Trustee of the Hilton UK Pension Plan

Hilton UK Pension Plan
Hymans Robertson
One London Wall
London EC2Y 5EA

HUKPP@hymans.co.uk