



## Dow Services Trustees UK Limited

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## Privacy Statement

### Privacy and the Use of Your Data

Dow Services Trustees UK Limited is the trustee (the “Trustee” or “we”) of the Dow Services UK Pension Plan (the “Plan”).

As trustee of the Plan, we hold certain personal information about Plan members and, where applicable, their dependants and beneficiaries. Most of the information held about you and processed by the Trustee in running the Plan will be “Personal Data”, as it is information from which you as an individual can be identified. Personal Data is subject to certain protections.

For legal purposes, the Trustee is the “data controller” of the Personal Data to which this statement relates, as we decide the purposes for and the means by which the Personal Data we hold is processed. We do this in accordance with applicable data protection legislation in the UK.

Similarly, other parties involved in running the Plan will sometimes need to make decisions jointly with the Trustee about how your personal information will be used for those purposes. This includes the Plan Actuary (currently Gareth Connolly of Willis Towers Watson). In legal terms, the Trustee and the Plan Actuary are “joint data controllers” in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

As a result of the insurance buy-in transactions undertaken for the Plan, certain insurers will also be data controllers in respect of relevant Personal Data. We have set out details of these insurers and how to view their privacy notices below.

In this Privacy Statement, you will see information about what the Trustee does with your personal information, and also what the Plan Actuary does with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Where the context requires, “we” or “us” means both the Trustee and the Plan Actuary where they are acting as joint data controllers in relation to your personal information (as described above).

**This is for information only** – you do not have to take any action in response to this information. The purpose of this Privacy Statement is to help you understand how we collect and use your personal information, and what your rights are in respect of that information.

### Whose Personal Data do we Process?

We process Personal Data of:

- all participants (and other claimants and beneficiaries) in the Plan;
- all visitors to the website; and
- everyone who contacts us.



### **Who provides us with Personal Data and how do we receive these data?**

- you, for instance when you join the Plan or send an e-mail, call, complete a contact form or visit the website;
- your employer, for instance by providing your salary details and your part-time percentage. We receive all (Personal) Data that are necessary for the proper execution and administration of your pension. Your (Personal) Data are delivered via a secure connection in a protected environment;
- (semi-) government agencies, for example HMRC; and
- other pension schemes, independent financial advisers, medical practitioners and other advisors or service providers.

### **Which Personal Data do we Process?**

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your full name, address and contact details (such as telephone number and email address);
- your age and date of birth;
- your sex/gender;
- your marital (or relationship) status;
- your benefit entitlement under the Plan;
- information about your health;
- your National Insurance Number (and employee number) and/or other evidence of identity;
- your pensionable service;
- details of your salary and other forms of remuneration;
- details of your bank account;
- details of any nominees to be considered for benefits in the event of your death; and
- information about your benefits under the Plan, including pensions and death benefits, together with corresponding details of assets, investments and insurance.
- details of your employment, such as role and status (such as full/part time)
- special categories such as medical information which is not routinely collected and processed and will only be done where it is necessary to do so in the circumstances.

### **How do we gather your Personal Data?**

We gather personal information from a number of sources, including the following:

- directly from you;
- from your current or former employer;
- from persons acting as personal representatives of a deceased person's estate;
- from a public body such as HMRC;
- from public databases such as the Register of Births, Deaths and Marriages;
- from other pension schemes, where transfers into the Plan have been made;
- from an independent financial adviser, solicitor or other person instructed by a person to provide us with information;
- from our advisers;
- from third parties used to trace members or beneficiaries with whom we have lost contact;
- with your consent, from a registered medical practitioner; and
- from other third parties including, for example, your next of kin or anyone else entitled to benefit from your membership of the Plan.



## For What Purposes and Based on What Do We Process Personal Data?

We process your Personal Data:

- to comply with our legal obligations under the documents governing the Plan and legislation governing the operation of pension schemes; and
- where we have a legitimate interest in holding and processing personal information about you as it is needed for us to properly administer the Plan and to calculate and pay benefits. This may include providing information to an administrator or insurer to allow them to calculate and pay benefits where we have a contract or insurance policy with them to do so. Although you can object to processing on this ground, this objection can be overridden where there are compelling reasons (e.g. because we need to process personal information to meet our legal obligation to pay benefits).

Personal data relating to the Plan is held on paper and on computer systems. As the “data controller”, the Trustee must process this information fairly and lawfully.

As part of running the Plan, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries (known as “special categories of personal data”). Under data protection legislation, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as “special categories of personal data”. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent.

We will not process personal information for any purpose or purposes which we have not told you about. However, there are exceptions to this. For example, if it were obvious to an individual that personal information would be processed for the new purpose or if the new purpose was in fact compatible with the original purpose(s) for which the personal information was collected.

## Who Do We Provide Personal Data To?

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

- the Plan’s professional advisers, including the auditor, medical advisers, investment adviser and lawyers;
- providers of administration and communication services;
- regulatory authorities, HMRC, the Pensions Regulator;
- insurers, AVC providers, annuity brokers; and
- any other third parties with whom we need to share personal data.

In particular, the Trustee will share personal information with:

- the Plan Actuary. As discussed above, the Plan Actuary is a joint data controller with the Trustee when using Personal Data held in respect of you for the purposes of assessing, with the Trustee, financial matters affecting the Plan. The current Plan Actuary is Gareth Connolly, whose address is: Towers Watson Limited, Watson House, London Road, Reigate, Surrey, RH2 9PQ. Further details relating to how the Plan Actuary and Towers Watson Limited use your personal information can be found here: [www.willistowerswatson.com/personal-data](http://www.willistowerswatson.com/personal-data); and
- the insurer providing the bulk annuity policy for your section of the Plan (in relation to the insurance buy-in transaction).



- For members of the Dow Section of the Plan this is the Pension Insurance Corporation plc, whose privacy notice can be found here: <https://www.pensioncorporation.com/content/dam/pic/corporate/documents/privacy-notices/PIC-privacy-notice-pic-buy-in.pdf>.
- For members of the Segregated DCL Section of the Plan, this is Rothesay Life plc, whose privacy notice can be found here: <https://www.rothesay.com/media/t3milv5u/scheme-privacy-notice.pdf>.

These insurers will also be data controllers in respect of the information they process.

### **The Protection of Your Personal Data**

Your Personal Data must be properly protected. This is very important to us, the Trustee, and the Plan's administrators. Therefore, we take technical and organisational measures to protect your Personal Data. These measures include measures against (cyber) crime, destruction, loss or other unlawful processing of your data. The measures taken meet at least the general requirements that are imposed on information security. We periodically evaluate the measures taken and adjust them if necessary.

Furthermore, we have made agreements both internally and with external parties about the confidentiality and security of your Personal Data.

### **Processing outside the UK or the European Economic Area (EEA)**

In exceptional cases, we may transfer, store, or process your personal data outside of the UK or EEA (as applicable). For example, this may happen if computer servers used by our providers are located in a country outside the EEA. Where this is the case, we will take reasonable steps to ensure that your personal data continues to be appropriately secured. This may include entering into data transfer agreements based on the model clauses approved by the European Commission or, where relevant, the UK, to ensure that third parties commit to ensuring an adequate level of protection for your personal data.

Further information about transfers of Personal Data outside of the UK or EEA (as applicable) can be detailed by contacting us at the address below.

### **Your Rights**

By law, you have rights that you can exercise against organisations that process your Personal Data, such as:

- **Right of access** – you have the right to request information about the processing of your personal data, 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.
- **Right to rectification** – if at any point you believe that the personal data we hold about you is wrong, you can ask to have it corrected.
- **Right to erasure (“right to be forgotten”)** – you can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.
- **Right to restriction of processing** – 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.
- **Right to object to processing** – as we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances.



You are entitled to exercise these rights but this is subject to certain restrictions under data protection legislation. If you would like to exercise your rights please [contact us](#). Always submit the exercise of your rights in writing. You will always receive an answer from us.

You should be aware that taking any of the above steps could impact on the payment of your benefits, 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.

### **Filing a Complaint**

You can file a complaint about the processing of your Personal Data. If you wish to file a complaint, contact us and always submit your complaint in writing. You will always receive an answer from us.

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 also complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

### **Withdrawal of Granted Permission**

If we process your Personal Data based on your consent, you can always revoke this consent. You can do this by following the same procedure as when you granted the permission. We will then stop the processing of your data as quickly as possible. However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified.

### **Retention Period for Personal Data**

We process your Personal Data with the purpose of executing and administering your pension in accordance with our legal obligations. Given the long term nature of the Plan, we will need to keep your Personal Data for as long as is reasonably necessary to determine members' entitlement to benefits from the Plan and to comply with our legal obligations in relation to the administration of the Plan.

We must keep certain personal data for a minimum of 6 years. However, the Trustee may be required to keep some of your personal information for a longer period (such as, in some cases, for the rest of your life). In the event we dispose of Personal Data, it will be done in a secure way.

### **Cookies**

This website uses cookies. There are different types of cookies. Functional cookies are cookies necessary to ensure the proper functioning of the website of the Plan. We always store these cookies on your device and they have no impact on your privacy. For cookies that do affect your privacy, such as analysing cookies, we ask for your permission as soon as you visit the website of the Plan. For more information, please read the cookie statement.

### **Who to contact**

If you wish to:

- see your personal data or to exercise any of the rights mentioned above;
- request a hard copy of the Privacy Statement; or
- make a complaint about how we have handled your personal data,

please contact us as follows:



Dow Section: please email [fpensuk@dow.com](mailto:fpensuk@dow.com)

Segregated DCL Section: please write to: Data Protection Officer, The Aon Centre, The Leadenhall Building, 122 Leadenhall Street, London EC3V 4AN or [privacy@aon.com](mailto:privacy@aon.com)

**Updates to this Privacy Statement**

The Trustee reserves the right to update this Privacy Statement from time to time. We recommend that you read the Privacy Statement regularly. The Privacy Statement was drawn up on 4 June 2024. You can always find the most recent version at the following website:

[www.mydowpension.co.uk](http://www.mydowpension.co.uk)

Alternatively, if you would prefer to receive a hard copy of this Privacy Statement, please let us know (see "Who to contact" above).