

Dear member

Sabre Pension Plan - UK ("the Plan")

Data Privacy Notice

Introduction

The Trustees of the Sabre Pension Plan - UK are collectively a "Data Controller" for the purposes of the data protection laws.

In their capacity as a **Data Controller**, the Trustees are entitled to process the **personal data** of their stakeholders (customers, employees, shareholders, suppliers, trustees, internet users etc.) in the ordinary management of existing relations. The Trustees may need to acquire **consent** to process certain data. Data processing for commercial purposes is carried out only if specifically authorised by **Data Subjects**.

The data protection laws were set out in the Data Protection Act 1998. New data protection laws replaced this with effect from 25 May 2018. We refer to both the old and the new data protection laws as the "Data Protection Laws" in this privacy notice.

Scope of Privacy Notice

This privacy notice sets out how the Trustees obtain, use and protect the personal information that they hold about members and other beneficiaries of the Plan.

You should share this notice with your family and dependants where you have provided us with personal information about them, for example, on your expression of wish form.

What is personal information?

Personal information is information that identifies a living individual. This would include any information provided to us by or on behalf of you, your employer or HM Revenue & Customs in relation to your actual or potential membership of the Plan.

Personal information we may collect about you

The Privacy Policy governs the use and storage of your data.

Personal details we may collect about you include:

- your name, contact details (your postal address, email address, mobile and telephone numbers), gender, date of birth, occupation, description of physical or mental health and identifiers such as your National Insurance number, pension or member reference number and your employee number (where applicable);
- family, lifestyle and social circumstances such as details about your current marriage or partnership and marital history, details of family and dependants;
- employment details such as your pensionable pay, length of service, employment and career history, recruitment and termination details, attendance records, job title and job responsibilities; financial

records such as any other income, pension payments, tax code, bank account details, and other benefits;

- information about criminal convictions if these relate to money owed to the employer in circumstances where the employer is entitled to be reimbursed from your benefits;
- any information regarding your dealings with us.

This information may be provided directly by you or by Sabre Global Technologies Limited (“the Company”) as part of the performance of the employment contract between you and the Company.

How do we use that Personal Information and who we may share your information with?

The Trustees need to use personal information about you to administer the Plan, and to calculate and pay benefits. Under the legislation, this means that your data is processed for the performance of the employment contract between you and the Company regarding your membership of the Plan, to comply with our legal obligations and because we have a legitimate interest in processing the information for the following purposes, if relevant:-

- to administer the Plan including to process data to calculate and pay benefits;
- 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;
- in relation to any correspondence (including queries relating to your membership of the Plan) related to the administration of the Plan;
- to notify you about our services and changes to our services;
- to trace your most recent location in order to communicate your benefits to you
- for statistical, financial modelling and reference purposes;
- for internal record keeping;
- risk management including credit risk analysis;
- complying with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
- in connection with any sale, merger, acquisition, disposal, recognition or similar change involving the Plan;
- to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries;
- to analyse and improve the activities, services and information offered by Benefit Options (the Plan administrator’s online administration site).

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

Due to the nature of running the Plan, we may also need to hold and process some particularly sensitive information about you and/or your dependants and beneficiaries. This is known in law as “Sensitive Personal Data” and includes information that relates to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations. Except where the legislation allows it, this

information cannot be processed or passed to a third party without your explicit consent. The Trustees will only collect any Sensitive Personal Data from you when it is needed, for example information about your health if you apply to receive your benefits on the grounds of ill health.

The administration of your pensions benefit is provided by Quantum Advisory (Quantum). To calculate your entitlement to any benefit under the Plan all information above will be processed by Quantum. Previous administrators of the Plan may retain your personal information in order to defend any potential litigation that arises as a result of their historic processing activities.

We may at times be required to share your data with other third-parties. Examples of this include:

- As part of our financial due diligence, auditing firms will be employed to audit our records;
- Tracing services may be used to prove your most recent location in order to communicate to you your benefits;
- Secure storage firms will be used to securely store any physical information produced whilst administering the Plan;
- The Company (as sponsoring employer);
- Annuity providers may be engaged to pay your pension benefit. For the provider to calculate any entitlement they will need personal information and in some circumstances sensitive personal information. Details of this will be provided at the time.

We may also share your data where we are under a duty to disclose your data in order to comply with any legal obligation. We do not share your data with any third party based outside of the European Economic Area.

How long do we keep personal information for?

The Trustees need to hold and process information about you for us to administer the Plan, and to calculate and pay benefits. Under the legislation, this means that we have a legitimate interest in processing the information. We also hold your information to allow us to comply with our obligations towards members under the Plan's governing documents, as well as relevant legislation.

We will not collect any personal data from you that we do not need and we will delete any data when we no longer require it.

To correctly administer the Plan, we need to be able to prove what benefits you were entitled to under the Plan and what has happened to this benefit.

For example, should you take a refund of your benefit and later, your dependant determines that you were a member of the Plan, the Plan must be able to demonstrate why benefits are no longer payable. For this reason, we will keep the information needed to identify you as long as necessary to comply with our legal obligations and resolve disputes. This does not apply in the case of any Sensitive Personal Data provided to the Plan. This information will be kept for the minimum time period that is required by law and in most circumstances for no longer than two years.

What are your rights?

- All data subjects can exercise their right of access: you have the right to know what personal data is held about you or someone else on your behalf, their origins and how they are used.
- You are entitled to receive the personal data which you have provided to us, in a structured, commonly used and machine-readable format, and to transmit that data to another data controller.
- If you believe that the personal data we hold about you is inaccurate, you can request to have the data updated, rectified, supplemented or deleted.
- You can instruct the Trustees to restrict the processing of your personal data in certain circumstances, for example, whilst an accuracy issue is being resolved.
- You can object to your personal data being processed, although the Trustees 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.
- You can request that your personal data is deleted altogether, although as mentioned above, the Trustees 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, the ability for you to build up benefits and our ability to answer questions relating to your benefits. Information will generally be provided to you free of charge, although the Trustees can charge a reasonable fee in certain circumstances.

Who to contact about personal information?

If you have any questions, comments, or requests or if you wish to see your personal data, exercise any of your rights mentioned above or make a complaint about how we have handled your personal data, please contact the Information Security contact via e-mail (sabre@qallp.co.uk) or in writing at:

The Trustees of the Sabre Pension Plan
Sabre Global Technologies Limited
1 Church Road
Richmond
TW9 2QE
sabrepensionuk@sabre.com

Our Information Security contact will then investigate your complaint and work with you to resolve the matter.

Making a complaint to the Information Commissioner's Office (ICO)

If you're still not satisfied with our response to any query raised with us, or you believe that your personal information has not been handled in a way appropriately according to the law, you can complain to the Information Commissioner's Office. Their helpline number is 0303 123 1113.

Please contact the Plan Administrator via e-mail (sabre@qallp.co.uk) if you have any queries.