



AUGUST 2022

From the Trustee of the TotalEnergies  
UK Pension Plan (the “Plan”)

# Data privacy notice



In order to run the Plan and pay benefits correctly, we need to hold personal details about all members.

As you may be aware, the rules on data protection have changed in the past few years. From 25 May 2018, the EU General Data Protection Regulation (EU GDPR) came into force in all EU and EEA member states. Despite Brexit, the EU GDPR forms part of UK law (known as the UK GDPR).

From 25 May 2018 we have therefore needed to comply with these new rules on handling personal data. The aim of those rules is to give people more say in how their personal information is used, and improve security by standardising the way organisations store and use personal information.

This notice summarises the way we obtain, store, use and share your personal information. If you have any questions, please contact the Plan administrators.

## Who we are

TotalEnergies Pension Trustee UK Limited is the trustee (the "Trustee") of the Plan.

As the Trustee of the Plan, we will hold certain personal information (known as "personal data") about members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustee in running the Plan will be personal data (in other words, it is information from which you as an individual can be identified).

For legal purposes, the Trustee is known as the "data controller", as we decide the purposes for and the means by which the personal data we hold is processed.

## What information we collect about you

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

- your name and date of birth;
- your gender;
- your marital status;
- your address and other contact details (such as telephone number and email address);
- your National Insurance number;
- details of your bank account if you are a pensioner or we are paying a lump sum to you (to pay benefits);
- information about your benefits under the Plan, including pensions and death benefits, together with corresponding details of assets, investments and insurance;
- your pensionable service;
- relevant employee information, such as current and past salary information, pensionable pay, employment dates, length of services, and career history (where relevant);
- details about your dependants and/or beneficiaries (including their names and possibly details of their gender), current relationship status, marital/relationship history; and
- medical and other details about your health.

In order to properly administer the Plan and to calculate and pay benefits, from time to time we may also need to hold other information about you.

## How we gather your personal information

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.

We will not collect any personal data from you that we do not need.

Where you have provided us with information about other individuals, such as family members, dependants or potential beneficiaries under the Plan, please ensure that those individuals are aware of the information contained in this notice.

## How we use that information

The Trustee has a legitimate interest in holding and processing the above information about you because it is needed for us to administer the Plan and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Plan governing documents, as well as under relevant legislation.

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 the 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.

# Transfers of personal data to other countries

Any transfer of Plan personal data outside of the UK or the European Economic Area (as applicable) will comply with the requirements of data protection legislation. In particular, such transfers will generally be made based on the EU Commission's standard contractual clauses or UK standard contractual clauses. You can find copies of these clauses [here](#).



## Who we share it with

We are not allowed to share personal data about you with other organisations and people, unless required for contractual or legal reasons or other specifically identified purposes, or you have given your consent. However, as we need help from various advisers to properly administer the Plan, we may share personal data with the following:

- your current, past or future employer which may include group companies which are based outside the UK or EEA (as applicable). Where data is sent outside the UK or EEA (as applicable), appropriate safeguards are put in place to ensure that your data is kept secure;
- the Pensions Manager, together with other employees of the sponsoring employers/s who provide support to the Plan (in particular the UK Pensions Department);
- the Plan's professional advisers, including the Plan actuary at Aon (see below), auditor, medical advisers, investment adviser and lawyers;
- the third parties who are responsible for the day-to-day administration of the Plan on behalf of the Trustee;
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) or other third parties as required by law – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities;
- persons in connection with any investment changes, sale, merger, acquisition, disposal, reorganisation or similar change involving the Plan (including any counterparties, potential or actual purchaser and their advisers);
- the advisers and printers who help us prepare various communications we send to you, such as the annual benefit statement;
- our appointed insurance company or companies for the purposes of life insurance and additional voluntary contributions;
- depending upon how we pay pensions, the personal data we have to supply in order to effect a BACS transfer (the Bankers' Automated Clearing Service) or CHAPS (the Clearing House Automated Payment System) in the UK and/or a payment via the administrators' banking providers when pensions are being paid overseas;
- any independent financial advisers appointed by the Trustee to provide members with financial advice; and
- insurance companies and other organisations for the purposes of liability and risk management exercises.

The following are also data controllers in relation to your personal data, which means they have to comply in their own right with the requirements of data protection legislation which apply to data controllers, as well as any relevant industry codes and standards when processing your personal data:

- TotalEnergies Pension Company UK Limited, as the Principal Employer of the Plan;
- the Plan's actuary;
- the Plan's auditor;
- the providers of the Trustee's bank account and investment custodian services;
- certain insurance companies for the purposes of life insurance and additional voluntary contributions; and
- certain insurance companies and other organisations for the purpose of liability and risk management exercises.

# How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Plan, their name and address, and details of benefits paid) for a minimum of six years. But, given the nature of pension schemes, the Trustee considers it necessary to keep some of your personal information for the rest of your life and an appropriate period after that so that we have the information we need in order to pay benefits and to answer queries relating to your benefits.

We will review the personal data held in relation to the Plan periodically in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

## Your rights

- **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 inaccurate or wrong, you can ask to have it corrected.
- **Right to restrict processing** – you can require the Trustee to restrict or 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 specific instances.
- **Withdrawing consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see “Who to contact about your personal data”). 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.
- **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 complain** – you have the right to complain to the Information Commissioner's Office, or to bring an action before the court, if your personal data rights are not complied with (see “Making a complaint to the Information Commissioner's Office” on the next page).

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.



## Who to contact about your personal data

### Please contact the Plan administrators if you wish to:

- see your personal data or to exercise any of the rights mentioned in this document; or
- make a complaint about how we have handled your personal data.

### To contact the Plan administrators:

 **0330 123 9570**

 **[totalenergies@buck.com](mailto:totalenergies@buck.com)**

 **TotalEnergies UK Pension Plan, Buck (Bristol), PO Box 319, Mitcheldean, GL14 9BF**

#### Making a complaint to the Information Commissioner's Office

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 complain to the Information Commissioner's Office. Their helpline number is **0303 123 1113**.

#### Updates to this notice

This notice is the latest version as at [August 2022]. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at **[pensioninfo.totalenergies.uk](https://pensioninfo.totalenergies.uk)**. Alternatively, if you would prefer to receive a hard copy of the notice, please contact the Plan administrators (see "Who to contact about your personal data" above).

Aon provides actuarial services to the Trustee and is a data controller for this purpose. They have a Privacy Notice that sets out how they use your personal information. We recommend that you review their Privacy Notice, which is available online at **[www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp](https://www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp)**.

Alternatively, you can request a copy by writing to the following address: Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH or by emailing **[RI.UK.PrivacyChampions@aon.com](mailto:RI.UK.PrivacyChampions@aon.com)**. Please remember to quote the Plan name in any correspondence.

**TotalEnergies UK Pension Plan, 18th Floor, 10 Upper Bank Street, London E14 5BF | [pensioninfo.totalenergies.uk](https://pensioninfo.totalenergies.uk)**