

# Trustee of the Leonardo Helicopters Pension Scheme Third Party Fair Processing Notices Appendix

Where third parties (such as the Scheme's advisers) are required to process your personal data in order to assist the Trustee or Company in administering the Scheme, those third parties may themselves act as 'data controllers' in respect of the way in which they process your personal data and produce their own fair processing notices (also referred to as 'privacy notices'). Various third parties have asked the Trustees to provide you with access to their fair processing notices which explain how they process personal data and meet their compliance obligations under privacy laws. The Trustee will publish any such notices, or links to websites containing those notices, in this Third Party Fair Processing Notices Appendix.

#### **Actuarial Services**

Aon Hewitt Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the makeup of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.



More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <a href="http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp">http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp</a>, or you can request a copy by contacting Aon, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.

# **Investment Manager**

The information our Investment Manager, Schroders Solutions (formerly known as River and Mercantile Solutions), receives and uses in relation to trustees, owners, officers and employees of clients is very limited. In order to provide services to the Scheme, they may need to:

- a) communicate with the Client's trustees, owners, officers and employees ("Client Contacts") in relation to the services;
- b) process identification details of the Client Contacts in order to confirm their identities;
- c) check such Personal Data against databases of individuals who are subject to sanctions, classified as "politically exposed persons" or have committed crimes and to follow up any suspicions to ensure that the Manager complies with its anti-money laundering and terrorism obligations and to avoid fraud itself;
- d) record or monitor communications;
- e) use such Personal Data to meet the Manager's compliance and regulatory duties;
- f) transfer such Personal Data outside the European Economic Area and the UK and disclose it to anti-fraud organisations and law enforcement or regulatory agencies anywhere in the world.

and the Investment Manager will be acting as a data controller in respect of such processing. Our Investment Manager's Privacy Notice is now available within the legal notices section of their website (<a href="https://www.schroders.com/en/privacy-policy/uk/">https://www.schroders.com/en/privacy-policy/uk/</a>).

#### Former Scheme Administrator

Aon Hewitt Limited, as the Scheme's former pension administrator, continue to hold a copy of the Scheme's data for audit trail and record keeping purposes, and are a data controller in respect of that data. More detail about Aon's use of your personal information is set out in their full Privacy Notice. We recommend that you review this notice which is available online at <a href="http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp">http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp</a>, or you can request a copy by contacting Aon,

including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH.

## <u>Leonardo UK Ltd – Sponsoring Employer</u>

Leonardo UK Ltd are data controllers with regards personal employee data. Leonardo UK Ltd has an appointed Data Protection Committee tasked with ensuring its compliance with data protection legislation. Leonardo UK Ltd's privacy notice can be found on Leonardo's website.

## Additional Voluntary Contribution Provider

Prudential Assurance Company are data controllers in respect of personal data which they hold for the purposes of providing Additional Voluntary Contributions (AVCs) to some members of the Scheme. Prudential has published its fair collection notice at <a href="https://www.pru.co.uk/mydata-bapn/">https://www.pru.co.uk/mydata-bapn/</a>.

#### Retirement and Annuity Services Provider

Depending on the tasks being undertaken for Scheme members, Punter Southall Aspire will be acting as data processors, or data controllers in some circumstances, in respect of personal data which they hold for the purposes of providing retirement services and annuity broking. Punter Southall Aspire has published its privacy notice at <a href="https://www.puntersouthall.com/privacy-policy-21">https://www.puntersouthall.com/privacy-policy-21</a>

## February 2023