



Abbott Laboratories Trustee Co Ltd

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The Abbott Laboratories Pension Fund (1966) **Your personal information and what we do with it**

As the Trustee of the Scheme, we need personal information about you to run the Scheme and pay benefits. In legal terms, as we are a 'data controller' of this information, we need to tell you some things about the personal information we might have about you and what your rights are in relation to it.

The type of personal information we have

We may now or in future hold some or all of the following types of personal information about you:

- Your name, date of birth, national insurance number and bank account information;
- Contact details (including your address, phone number and your email address);
- Your employer when you were building up benefits in the Scheme, how long you worked for them and your salary from time to time;
- Whether you are married or in a civil partnership and other information we might need to pay any death benefits due in relation to you (only if you have provided it to us);
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Scheme or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions where it is relevant to your entitlements under the Scheme.

Where we get personal information

Some of the information we have comes directly from you. We will also have received information (such as salary details) directly from your current or former employer. In addition, the Mercer pension team, which administers the Scheme on our behalf, may have obtained information from you and passed it to us. The attached Appendix describes the information that Mercer hold.

Sometimes we get information from other sources, for example, another Scheme if you have transferred benefits from them, government departments such as HMRC and DWP and publicly accessible sources (for example the electoral roll) if we lose touch with you and try to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences if you choose not to do so.



Our legal basis for using your personal information including how we share it

The Trustee must by law provide benefits in accordance with the Scheme's governing documentation and must also meet other legal requirements in relation to running the Scheme.

We will use your personal information to comply with these legal obligations, to establish and defend the legal rights of the Scheme and the Trustee, and to prevent and detect crimes such as fraud. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

We also have a legitimate interest in properly administering the Scheme. This includes paying benefits as they fall due, purchasing insurance contracts, communicating with you; ensuring that the correct levels of contributions are paid, ensuring benefits are correctly calculated; calculating the actuarial liabilities of the Scheme; making Trustee decisions such as how to distribute benefits after your death; and ensuring that the expected standards of governance are met (including following The Pensions Regulator's guidance).

To achieve this, we may share your personal information with various people, including new members of the Trustee Board; employers; the Scheme administrator; the Scheme actuary; our other advisers; auditors; insurers; HMRC; the Pensions Ombudsman; IT and data storage and other service providers; and potentially the Pensions Regulator and the Pensions Protection Fund. If your benefits are transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

Mercer Ltd, the scheme's administrators, will hold your personal information indefinitely in order to administer the scheme. Gallagher Ltd will hold your personal information for a short period only every year in order to produce your annual benefit statement.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent and we will do so where that is necessary for us to run the Scheme in a sensible way. You can withdraw your consent at any time by using our contact details (below). This may affect what we can do for you unless we have another lawful reason for using your information.

We may also share your personal information with someone else where you have given your consent, for example, where you transfer the value of your benefits out of the Scheme.

There are unusual circumstances in which we will need to obtain your specific consent to process special categories of data. If any such circumstances arise we will provide full information when we ask for your consent.

Sometimes, your information may be used for statistical research or reporting about the Scheme in general but only in a form that no longer identifies you.

How to contact the other people to whom we give your personal information

Some of the people we mention above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers. For example, Mercer Ltd, who supply administration and actuarial services, are for some aspects data controllers in their own right. In this case, they are subject to the same legal obligations as us in relation to this information and the rights you have in relation to your information apply to them too. The attached Appendix describes the information that Mercer hold.

If you want any more information from any of these recipients or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

How long we keep your personal information

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, some of the personal information that we hold will be kept for a period of 15 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you.

However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), and our legal obligations (mentioned above).

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you including the right in certain circumstances to access, receive a copy of, correct, delete or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us.

Our contact details for exercising these rights are set out below and we can supply more information about these rights to you on request.

Keeping your information safe

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.



When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas, so your personal information may be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Changes to this policy

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are notified to members.

Queries and further information

If you want more information about what we do with your data and what your rights are, the Trustee can be contacted at: James Churcher, Secretary to the Trustee, Abbott Laboratories Trustee Co Ltd, Abbott House, Vanwall Business Park, Maidenhead, Berkshire SL6 4XE. You can email any enquiry to james.churcher@abbott.co.uk or 'phone 01628 774652.

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns. You can phone the ICO helpline on 0303 123 1113.

We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.

7 September 2018

Mercer and the Scheme Actuary's processing activities as data controller

- (a) Mercer and Scheme Actuary collect and Process the following categories of Personal Data (including special categories of data) as data controllers:

Details such as a member's name, date of birth, gender, address, email address, telephone number, employer name, employment and pensionable service periods, salary, nature and details of current and historic pension arrangements, pension amounts, pension contributions, employee benefits, marital status, beneficiary details, bank details, national insurance number, medical records and/or ill-health status in relation to current, former and potential members of Client's pension scheme; beneficiaries of current, former and potential members of Client's pension scheme; and representatives of the Client.

- (b) Depending on the scope of its engagement, Mercer (and the Scheme Actuary) will Process Personal Data to provide actuarial services, to comply with its statutory and regulatory obligations, to maintain accounts and records and to conduct analysis in order to improve its products and services.
- (c) Except where Mercer (and the Scheme Actuary) must rely on Client obtaining Data Subjects' consent to the Processing, the legal grounds Mercer (and the Scheme Actuary) relies on in order to undertake such Processing are the "legitimate interests" ground or "necessary for performance of a contract" ground.
- (d) Mercer and the Scheme Actuary shall retain Personal Data that it Processes in accordance with its document retention and deletion policies and as required by law or in order to defend any actual or possible legal claims.
- (e) Mercer is an affiliate of Marsh & McLennan Companies, Inc. "**MMC**", and "**MMC Group**" shall mean the corporate group of MMC. MMC has adopted processor binding corporate rules in the form of the Processor standard (the "**Standard**") in order to provide adequate safeguards for transfers of Personal Data from certain MMC Group Affiliates to certain non-EEA MMC Group Affiliates. The Standard will be made available at <https://www.uk.mercer.com//data-protection.html>.
- (f) The transfer of Personal Data outside of the EEA or a country recognised by the European Commission as providing an adequate level of protection for personal data, shall be covered by a framework recognised by the relevant authorities or courts as providing an adequate level of protection for Personal Data, including but not limited to binding corporate rules, Standard Contractual Clauses or the EU-US Privacy Shield Framework