

**Commonwealth Bank of Australia (UK) Staff Benefits Scheme Trustee  
Company Limited (the 'Trustee')**

**Commonwealth Bank of Australia (UK) Staff Benefits Scheme (the 'Scheme')**

**PRIVACY NOTICE**

**1 Background**

- 1.1 The Trustee ('**we/us/our**') holds and uses personal information about members of the Scheme, their agents and dependants - people who may be eligible to receive benefits after your death ('**you/your**'). In doing so, the Trustee complies with relevant data protection legislation.
- 1.2 As a data controller, the Trustee collects and processes your personal data for the purposes of complying with its legal duties to administer the Scheme, and for other legitimate purposes relating to the operation of the Scheme. The Trustee is committed to safeguarding your privacy and uses commercially reasonable physical, electronic and procedural measures to protect your personal information in accordance with data protection legislative requirements. This Privacy Notice sets out our personal information collection, use and sharing practices of the personal information you provide to us and any information about your beneficiaries, either in person, in writing, through a website, via email or over the telephone. We assume that you have the consent of any beneficiaries to give us this information and that you will share this Privacy Notice with them.
- 1.2 Further notices highlighting certain uses we wish to make of your personal information together with the ability to opt in or out of selected uses may also be provided to you when we collect personal information from you.
- 1.3 This Privacy Notice is intended to explain our privacy practices and covers the following areas:
- (a) what personal information about you we may collect;
  - (b) how we may use your personal information;
  - (c) who we may disclose your personal information to;
  - (d) how we protect your personal information;
  - (e) contacting us and your rights in relation to your personal information; and
  - (f) how changes to this Privacy Notice will be made.

**2 Information we may collect about you**

- 2.1 We may collect and process the following personal information about you to help us calculate and pay your benefits:
- (a) **biographical information you or your employer provides to us:** personal information that you or your employer provides to us, such as in relation to your membership of the Scheme including your name, gender, age and date of birth, address (and/or proof of address), other contact details, national insurance number;
  - (b) **employment information you or your employer provides to us:** your bank account details, details of your employment (including your salary) and details of your family and dependants;
  - (c) **anti-fraud information:** information which establishes your identity, such as birth/marriage/death certificates and passports;

- (d) **our correspondence/telephone notes:** if you contact us, we may keep a record of that correspondence;
- (e) **benefits details:** details of the benefits provided to you under the Scheme and any benefit choices you have made; and
- (f) **website and communication usage:** where you visit our websites, we also collect details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operation system, traffic data, location data, web logs and other communication data and the resources you access.

### Special Categories of Personal Data

In order to effectively administer your benefits under the Scheme, we are required to collect, hold, process and disclose 'sensitive' data ("**Special Categories Data**") about you which may include health data or data relating to your sexual orientation and/or the gender of your partner which you may provide or have provided to us or we may have obtained or may obtain from other sources to the extent relevant to the administration of your benefits under the Scheme.

For example, we may need to process data about your health in relation to your application for an ill-health benefit and we may record details of your relatives and/or dependants, for example, on an 'Expression of Wishes' form so that we can distribute any benefits payable on your death.

Where we process Special Categories Data, we will generally do so in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by UK data protection legislation). We may also process Special Categories Data when considering claims under the Scheme's Internal Dispute Resolution Procedure or for the purposes of establishing, exercising or defending legal claims.

**Where we cannot rely on another processing ground, we will ask for your consent to us processing Special Categories Data so that we can adequately provide a pensions administration service to you. Where you are providing information about dependants, you agree that you have provided our Privacy Notice to them and obtained their consent to our collection, holding, processing and disclosure of their Special Categories Data as set out above.**

2.2 If we ask for your explicit consent to process your personal data, then you can withdraw this consent at any time by contacting us using the details at paragraph 5.4 of this Privacy Notice.

2.3 You should be aware that in most circumstances we will not be able to provide pension administration services to you or calculate and pay benefits to you or your dependants without continuing to process this personal data.

## 3 Uses made of your personal information

3.1 The Trustee acknowledges that in order to process your personal data, it must have a lawful basis for doing so. The Trustee has identified the lawful bases for processing your personal data and relies on the fact that it has a legitimate interest in processing this data to enable the Trustee to perform its obligations, manage its business and/or provide services to you or such processing is necessary for compliance with a legal obligation to which the Trustee is subject. Further explanation of these legal bases can be found in Appendix 1 to this Privacy Notice.

3.2 We may use your personal information in the following ways:

- (a) **to provide our services effectively to you, administer your benefits under the Scheme and conduct our business:** to administer our services, including carrying out our

obligations (including in relation to administering the benefits under the Scheme), which may include passing your data to third parties such as agents or contractors (e.g. pension secretariats and third party administrators) or to our advisors (e.g. legal, actuarial, covenant, investment or other advisors);

- (b) **actuarial valuations:** in order to comply with our actuarial duties, we are required to provide membership data to our actuarial advisers to undertake all of the actuarial work necessary for the Scheme;
- (c) **monitoring of the Scheme administrator(s):** we may use data provided by you to monitor the performance of our administrator(s), such as reviewing feedback from member questionnaires and looking into complaints;
- (d) **investment advisors:** we are required to provide membership data to our investment advisers to undertake the investment work necessary for the Scheme;
- (e) **in relation to fraud prevention:** we and other relevant organisations may also access and use certain information to prevent fraud as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them;
- (f) **to recover debts due:** to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action (including the commencement and carrying out of legal and court proceedings);
- (g) **for research and development purposes:** to analyse data in order to better understand our members' requirements, to better understand our business and develop our services;
- (h) **to inform you of changes:** to notify you about changes in respect of the administration of the Scheme;
- (i) **to transfer it to a replacement trustee:** in the event that we are removed as a trustee (for example, if an independent trustee were appointed), we may need to transfer some or all of your personal information to the relevant replacement trustee or third party (and/or its advisors) as part of any due diligence process or transferred to that third party and used for the same purposes as set out in this Privacy Notice;
- (j) **in connection with legal or regulatory obligations:** we may process your personal information to comply with our regulatory requirements which may include disclosing your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

3.3 Where appropriate, we share your personal data with certain third parties involved in running the Scheme, including:

- the Scheme administrator(s);
- the Scheme actuary and their support team;
- the Scheme employer and its advisers;
- buy-in providers and similar providers to assess future provision of benefits outside the Scheme (including those with whom the Trustee has already secured certain benefits in the Scheme), together with their reinsurers and third party administrators; and

- other persons responsible for providing or communicating benefits, e.g. occupational health service providers.

3.4 We may also make information about you available to:

- any other companies associated with the Scheme employer - for example, to firms which may buy (or have already bought) part or all of the Scheme employer's business; and
- the trustee, sponsoring employer, administrators or professional advisers of any pension scheme you may have transferred benefits to or from.

3.5 These third parties have a legitimate interest or legal obligation to process your personal data.

## **4 Transmission, storage and security of your personal information**

### **Security over the internet**

4.1 The Trustee is aware of the standard of security and appropriate technical and organisational measures required under UK data protection legislative requirements. While no data transmission (including over the Internet or any website) can be guaranteed to be secure from intrusion, the Trustee has considered factors such as the costs of implementation of security, the nature, scope, context and purposes of processing and the risk of the varying likelihood and severity for your rights and freedoms to ensure it maintains appropriate physical, electronic and procedural safeguards to protect your personal information.

4.2 All information you provide to us is stored on our and/or our subcontractors' secure servers and accessed and used subject to our security policies and standards. If we have given you (or where you have chosen) a password which enables you to access certain parts of our and/or our subcontractors websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we or our subcontractors notify you of. We ask you not to share a password with anyone.

4.3 The Trustee is satisfied that at the date of this Privacy Notice, it meets the security of processing requirements set out in UK data protection legislation and shall keep such measures under review/

### **Export outside the UK**

4.4 Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the UK) in which data protection laws may be of a lower standard. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy in the UK to ensure that the person(s) receiving your information have proper security measures in place including appropriate contractual arrangements.

4.5 Please contact us using the details set out in paragraph 5.4 below if you would like to see a copy of the specific safeguards applied to the export of your personal information.

### **Storage limits**

4.6 Pension benefits are payable over a long period. We will retain your personal information for as long as is necessary for the processing purpose(s) for which they were collected and any other permitted linked purpose (usually throughout your membership of the Scheme). Once your membership ends (for example on death or transfer out of the Scheme) we will usually retain personal data up until the later of the death of the beneficiary or dependant (as applicable) plus six years. If information is used for two purposes, we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period one that period expires.

- 4.7 We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs, to make sure the Scheme pays the correct benefits and to deal with any queries about your benefits which may arise. Once your information is no longer needed it is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed.

## **5 Your rights & contacting us**

### **Your rights**

- 5.1 If you have any questions in relation to our use of your personal information, you should first contact us using the details set out at paragraph 5.3 below. Under certain conditions, you may have the right to require us to:
- (a) provide you with further details on the use we make of your information;
  - (b) provide you with a copy of information that we hold about you;
  - (c) update any inaccuracies in the personal information we hold (we will use reasonable endeavours to ensure that your personal information is accurate). In order to assist us with this, you should notify us of any changes to the personal information that you have provided to us by contacting us using the details set out in paragraph 5.4 below);
  - (d) delete any personal information we no longer have a lawful ground to use;
  - (e) where processing is based on consent, to withdraw your consent so that we stop that particular processing;
  - (f) object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
  - (g) restrict how we use your information whilst a complaint is being investigated.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights, we will check your entitlement and respond in most cases within a month.

- 5.2 If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to complain to the Information Commissioner's Office (**ICO**). The ICO can be contacted at:

Information Commissioner's Office (Head Office)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

### **Contacting us**

- 5.3 The "data controller" of your personal information processed by us under this Privacy Notice is the Trustee.
- 5.4 If you have any questions in relation to this Privacy Notice or want to know more about the information the Trustee holds and why, please contact Aptia at:

The Trustee of the Commonwealth Bank of Australia c/o

Aptia UK Limited  
Maclaren House  
Talbot Road  
Stretford  
Manchester  
M32 0FP

Telephone: 0345 074 4084  
Online: <https://www.pensionuk.aptia-group.com/>

## **6 Changes to our Privacy Notice**

- 6.1 The Trustee reserves the right to amend this Privacy Notice from time to time.
- 6.2 This Privacy Notice was adopted on 25 May 2018 and was last updated on 20 July 2024.
- 6.3 Further notices highlighting particular uses we wish to make of your personal information together with the ability to opt in or out may be provided to you when we collect certain personal information from you.

## Appendix 1

### Details of lawful bases for the processing of personal information

There are six lawful bases for the processing of personal information:

<b>Consent:</b> where you have explicitly consented to our use or processing of your information for a specific purpose. You will have been presented with a consent form in relation to any such use.
<b>Contract performance:</b> where your information is necessary to enter into or perform a contract or contractual obligations.
<b>Legal obligation:</b> where we need to use your information to comply with our legal obligations.
<b>Vital interests:</b> where we need to process your information to protect someone's life.
<b>Public task:</b> where your information is necessary to perform a task in the public interest or for an official function.
<b>Legitimate interests:</b> where we use your information in your legitimate interests or the legitimate interests of a third party and our reasons for using your information outweigh any prejudice to your data protection rights.

Where the Trustee needs to collect, hold, process or store your Special Categories Data as referred to in the section 3 of this Privacy Notice, it will do so in connection with the following:

<b>Protection of vital interests of you or another person, where you are unable to consent:</b> Processing is necessary to protect the vital interests of you or of another natural person where you are physically or legally incapable of giving consent.
<b>Legal claims:</b> where your information is necessary for us to establish, defend, prosecute or make a claim against you, us or a third party.
<b>In the substantial public interest:</b> Processing is necessary for reasons of substantial public interest, on the basis of EU or local law.
<b>Explicit consent:</b> You have given your explicit consent to the processing of this personal data for one or more specified purposes. You are free to withdraw your consent by contacting us in accordance with Section 5.4 of this Privacy Notice. If you do so, we may be unable to provide a benefit or service that requires the use of such data.