

Vodafone Group Pension Scheme

Personal data privacy statement

Background

The Directors of Vodafone Group Pension Trustee Limited (the Trustee) are required to collect and use personal data in order to administer the Vodafone Group Pension Scheme (the 'Scheme') effectively and to meet certain member requirements.

Such data may relate to the following "Data Subjects"

- Scheme members and their relatives;
- Nominated beneficiaries and dependants;
- Suppliers and professional advisers with whom the Trustee conducts business, and
- the Trustee Directors themselves.

The Trustee is the 'Data Controller' of personal data which is the subject of this notice, and its contact details are set out overleaf. All personal data that the Scheme collects, records or uses in any way, whether held on paper, on computer or other media will be the subject of appropriate safeguards to ensure that the Trustee complies with the applicable legislation.

The purpose of this statement is to provide information that the Trustee is required to make available to Data Subjects.

Types of data processed by the Trustee

The type of personal information held by the Trustee which constitutes personal data include:

- Name;
- Address and other contact details;
- Gender;
- Date of birth;
- Marital (or relationship) status;
- National Insurance number;
- Historical employment data;
- Bank account details;
- Benefit entitlements; and
- Death benefit nominees.

Purposes of processing

The personal data processed by the Trustee is used to administer the Scheme effectively. The legal basis for this processing is the legitimate interests of the Trustee in administering the Scheme and/or (in some cases) that the processing is necessary for compliance with a legal obligation to which the Trustee is subject. If appropriate personal data is not received by the Trustee, it may be unable to provide some or all of the benefits to which a member is otherwise entitled.

Sources of the personal data processed by the Trustee

The data processed by the Trustee may be provided by the Data Subjects themselves, current and former employers of Scheme members, other pension schemes and pension providers, independent financial advisers, medical practitioners, other advisers with whom the Trustee communicate in relation to the administration of the Scheme, and Her Majesty's Revenue and Customs (HMRC).

Persons to whom the personal data may be disclosed

The Trustee may disclose personal data to actuarial and other advisers where this is required in order to administer the Scheme, to providers of other professional services, regulatory authorities and healthcare practitioners, insurers, HMRC, the Pensions Regulator and any other persons to whom the Data Subjects have authorised the data to be disclosed, such as other pension schemes and independent financial advisers.

The Trustee may also provide personal data to suppliers of data processing or administration services, to whom certain tasks associated with the administration of the Scheme have been outsourced. These entities may transfer personal data to countries outside the European Economic Area. The Trustee has contracts with all such third parties, which confirm that the service providers agree to comply with certain obligations under the law, primarily in relation to security measures surrounding the data that they process for the Trustee.

Personal data may also be provided to Vodafone Group companies and potential or actual acquirers of any Vodafone Group company or business, subject to appropriate measures having been taken as regards the confidentiality of the data.

Data Subject access requests

All data subjects have a right to:

- be told about the data that the Trustee holds about them and to receive a copy of the information that constitutes personal data about them, on request;
- request access to and rectification or erasure of personal data, restriction of processing concerning the data subject and the right to data portability (as set out in, and subject to limits imposed by, applicable laws);
- lodge a complaint about processing with the UK data protection supervisory authority (the Information Commissioners Office).

If you wish to exercise this right, or wish to contact the Trustee about your personal data, you should submit a written application to:

Vodafone Group Pension Trustee Ltd
Vodafone House
The Connection
Newbury
Berkshire RG14 2FN