



PRIVACY NOTICE FOR THE ATOS UK 2019 PENSION SCHEME (the “Scheme”)

The Trustee, Atos Pension Schemes Limited, holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, the Trustee complies with relevant data protection legislation.

What we do with your data

The Trustee is a data controller. As you are either a member, beneficiary or potential beneficiary of the Scheme, the Trustee may collect and process your personal data for the purposes of complying with its legal duties to administer the Scheme, which include: the calculation, administration and payment of benefits under the Scheme before or after your death, processing ill- health retirement claims, carrying out actuarial valuations, investment of the Scheme’s assets, or dealing with any queries or complaints regarding benefit entitlements.

The legal basis for processing your data is in order for the Trustee to comply with its legal obligations (including processing death benefit claims and/or to calculate benefits), and other legitimate interests, such as the efficient management of the Scheme. The Trustee also processes personal data for other legitimate purposes relating to the operation of the Scheme. For example, this could include changes to benefit design or de-risking exercises, or to comply with the Trustee’s duties in relation to pensions dashboards for Scheme members.

In some cases, it may become necessary for the Trustee to process personal data for specific legitimate interests that are recognised in law. These recognised legitimate interests include: public task disclosure requests; national security, public security and defence; detecting, investigating and preventing crime; and/or safeguarding vulnerable individuals.

What data do we hold?

Whilst much of the data the Trustee holds has been provided by Scheme members, beneficiaries or potential beneficiaries themselves, it also holds and processes data provided by other parties. These include Atos IT Services UK Limited as the Scheme’s principal and sponsoring employer (the “**Employer**”), former employers in the Scheme, previous pension schemes, HMRC, the General Registrar’s Office, the DWP and regulatory bodies and by tracing organisations. Data may also be received from employers about beneficiaries or potential beneficiaries via expression of wish forms they hold, or in the event of death cases involving any sensitive personal data received. The Trustee also receives information directly from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death.

The data the Trustee holds is to assist it to calculate and pay the benefits the members, beneficiaries and potential beneficiaries are entitled to. This includes: your name, email address, postal address, national insurance number, mobile number, landline number, gender, date of birth and financial data (including payment details in order to pay benefits (e.g. bank accounts, name of bank etc.)). For members, this will also include details from your period of employment with the Atos group (e.g. employment history, recruitment and termination details relating to your period of employment with the relevant employer) and membership of the Scheme (e.g. your income and/or benefits, assets, bank account details).

The Trustee also holds some special categories or “sensitive” data about individuals for the purposes of

administering the Scheme (for example in relation to ill-health or death benefits, or biometric data for the confirmation of your identity and address if you are resident outside of the UK). The Trustee will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of its legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where the Trustee seeks your explicit consent to process sensitive data then you can withdraw it at any time.

Who else processes your data?

The Trustee may share your personal data with certain third parties involved in running the Scheme. These include Independent Trustee Services Limited, part of Independent Governance Group, as corporate director of the Trustee, XPS Pensions Consulting Limited as Scheme Secretary, Isio Group Ltd (“Isio”) as Scheme Administrator and any other parties necessary for the administration of the Scheme, Martin Bell of Willis Towers Watson Limited as Scheme Actuary, CMS as the Trustee’s legal advisers, and KPMG as the Scheme’s auditors. It may also include investment advisers, investment managers, communication printers, tracing organisations, AVC providers and administrators, independent financial advisers, the Trustee’s indemnity insurers, the Scheme’s death in service insurer, bank account providers, document sharing services (to facilitate access to documents by the Trustee and its advisers), the Employer, and governmental and regulatory bodies, for example, HMRC, the Pensions Ombudsman, the Pensions Regulator, the Money and Pensions Service, as well as other third parties involved with the provision of pensions dashboard services (including dashboard-specific integrated service providers).

In some circumstances the Trustee is a joint controller with the Scheme Actuary, the legal advisers (who will process personal data to comply with their professional duties as advisers to the Trustee), and the Employer. The Employer holds your data to comply with its legal obligations as the employer and principal employer of the Scheme. They have a legitimate interest in the Scheme being run in a cost effective way and may have an interest in offering certain options to members and beneficiaries. The Trustee will share information with the Employer and its auditors and advisers for this purpose.

The Employer and certain advisers will from time to time transfer data to other countries, including outside the United Kingdom. Where such transfers are made, the parties involved will ensure adequate safeguards are in place. In this regard, the Scheme’s actuarial advisers Willis Towers Watson makes use of overseas service centres to help support the activities undertaken for the Scheme and its members by the UK actuarial team. Contractual arrangements have been put in place including the EC Standard Contractual Clauses and the International Transfer Data Agreement addendum, as permitted by the UK data protection regulator (currently the Information Commissioner’s Office), to regulate the sharing of Scheme personal data with the overseas service centres. Technological and operational measures have also been put in place in line with Willis Towers Watson’s global policies to help protect the security and integrity of Scheme personal data shared with the overseas service centres.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. The Trustee will retain information relating to you whilst you are a Scheme member and will store this information for as long as the Trustee needs it.

Where you are provided with any benefit from the Scheme as a beneficiary, the Trustee’s policy is to keep any information relating to you at least until payment of your benefits ceases, save that if biometric data has been processed for the purposes of verifying your identity and address, this may be held for as long as the Trustee needs it.

Personal data regarding potential beneficiaries may be required to help assist the Trustee’s

consideration of how discretionary benefits should be distributed following the death of a member. Even if no benefit is ultimately awarded to the individual concerned, it is similarly the Trustee's policy to keep any information relating to that individual at least until any benefits have been distributed.

Once your Scheme membership ends, or where any payment of benefits ceases or the benefits have been distributed (whichever applies), the Trustee may decide to delete some of the data held in relation to you after an appropriate period. However, information may be held for longer where the Trustee considers it appropriate in order to ensure the Scheme has paid the correct benefits and/or to deal with any queries relating to your benefits which may arise after that time. For any potential beneficiaries, this also includes any queries relating to the distribution of those benefits that may arise after that time.

Isio will delete or return personal data to the Trustee after the termination of the contract with the Trustee but may continue to hold personal data where it has a lawful basis for doing so.

Your rights

You have the right to access your personal data and require that the Trustee rectifies any errors in the data that it holds, or request that the Trustee erase your personal data. In some circumstances, you

can also require that the Trustee restricts the way the Trustee processes your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where the Trustee has requested and obtained your consent to process particular information, you may withdraw that consent at any time. However if the Trustee does not hold all the data it needs to administer your benefits, it may not be able to pay out the benefits you are entitled to.

You can exercise your rights by using the contact details below.

Contact details

If you require further information, the contact details of the Trustee are:

Address: Atos UK 2019 Pension Scheme, Isio Group Ltd, PO Box 163, Blyth, NE24 9GS

Email: atos@isio.com

Telephone: 0330 024 3694

Please use the above contact details if you would like to contact any other controllers listed in this notice.

What if you have a complaint?

To make a complaint about how the Trustee has handled your information, contact the Trustee as set out above if you consider that we have breached the UK GDPR. We will acknowledge your complaint within 30 days and will investigate your complaint in accordance with our legal obligations. If you are not satisfied with the Trustee's response to your complaint or believe its processing of your information does not comply with data protection law, you can make a complaint to the UK data protection regulator (currently the Information Commissioner's Office). Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745

It will normally expect you to have exhausted the Scheme's internal procedure before making a complaint.

This notice is the latest version as at 19 June 2026.