



## UNIAC Pension Fund Personal Data Privacy Statement

The purpose of this Privacy Policy is to explain how the Trustees of the Uniac Pension Fund ("the Fund", "we", "us") collect, use, share, and protect your personal information, and to outline the rights you have under UK data protection law.

### 1. Background

The Directors of UNIAC Pension Trust Limited and the Law Debenture Pension Trust Corporation plc ("**the Trustees**") are required to collect and use personal data in order to administer the UNIAC Pension Fund (**the Fund**) effectively and to meet certain employer and member requirements. Such data may relate to Fund members (including active members, deferred members, pensioner members, pension credit members and member beneficiaries) and their relatives, nominated beneficiaries and dependents, Unilever Group companies' employees, suppliers and professional advisers with whom the Trustees conduct business, and the Trustees themselves ("**data subjects**"). The Trustees are the "**data controller**" of personal data which is the subject of this notice, and their contact details are set out in section 10 below.

We are committed to ensuring your personal information is handled in accordance with the "Data Protection Legislation" (meaning the UK Data Protection Act 2018, the UK GDPR (as defined in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019/419), The Data (Use and Access) Act 2025 (DUA), the Privacy and Electronic Communications (EC Directive) Regulations 2003, and all similar or related legislation relating to the processing of personal information and/or privacy applicable to us).

### 2. Types of data processed by the Trustees

The types of personal information held by the Trustees which constitutes personal data include:

- Data subject's full name;
- Home address and other contact details;
- Gender;
- Date of birth;
- Marital (or relationship) status;
- National Insurance number;
- Annual (or pensionable) salary;
- Other forms of remuneration;
- Bank account details;
- Benefit entitlements;
- Death benefit nominees; and
- Information about your employment history.

In some limited circumstances, the Trustees may collect and use special categories of personal

information, but will only do so with your express consent. We will make clear to you when your consent is needed.

The information which we collect and store during normal use of the site and our landing pages is used to monitor and analyse how parts of the site are used. This may result in personal data about the device you are using being collected and stored e.g. IP address.

We may collect and process the following data about you (which may include personal data):

- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our website and landing pages including but not limited to, traffic data, location data, weblogs, the resources that you access and other communication data.
- We may ask you for information when you report a problem with our website or landing pages.

### **3. Purposes of processing**

The personal data processed by the Trustees is used to administer the Fund effectively and to meet certain employer and member requirements, which include paying benefits to you and other beneficiaries in connection with members' employment (or previous employment) with an employer participating in the Fund. The legal basis for this processing is the legitimate interests of the Trustees in administering the Fund and/or (in some cases) that the processing is necessary for compliance with a legal obligation to which the Trustees are subject. Additionally, this may include providing you with access to services that may help you understand your benefits and to help us and the employers participating in the Fund review and manage financial matters relating to the Fund, together with our respective advisers.

If appropriate personal data is not received by the Trustees, they may be unable to provide some or all of the benefits to which a member is otherwise entitled.

Our marketing system collects data on your visits to our website and landing pages including but not limited to, traffic data and location data – you can only be identified on this system, or if you specifically request the Fund administrators or a member of the Pensions Team to record your data on your behalf. We process personal information because:

- It is necessary to comply with our legal obligations as Trustees of the Fund.
- We have a legitimate interest to do so, in order to administer and manage the Fund.
- In limited cases, you have given consent (e.g. for certain health information).

In certain circumstances—including safeguarding vulnerable individuals—we may, pursuant to the Data (Use and Access) Act 2025, rely on "recognised legitimate interests" as our lawful basis for processing personal information without carrying out a full Legitimate Interests Assessment.

### **4. Sources of the personal data processed by the Trustees**

The data processed by the Trustees is provided primarily by the data subjects themselves, as described in section 1 above. Other information may be provided by current and former employers of Fund members, other pension schemes and pension providers, independent

financial advisers, medical practitioners, other advisers with whom the Trustees communicate in relation to the administration of the Fund, and His Majesty's Revenue and Customs (HMRC).

## **5. Persons to whom the personal data may be disclosed**

When the Trustees consider it necessary for the purposes explained in Section 3, The Trustees may disclose personal data to actuarial and other financial advisers where this is required to administer the Fund, and to providers of other professional services, regulatory authorities and healthcare practitioners, insurers, employers of data subjects, HMRC, the Pensions Regulator, other pension schemes, independent financial advisers and any other persons to whom the data subjects have authorised the data to be disclosed. Please know that in certain circumstances these third parties will be the "controller" of that information, so please do familiarise yourself with their privacy policies.

The Trustees may also provide personal data to suppliers of data processing or administration services, to whom certain tasks associated with the administration of the Fund have been outsourced. These entities may transfer personal data to countries outside the UK. We will take appropriate steps to ensure that your personal information continues to be treated securely and in accordance with this statement when it is processed in, or otherwise accessed from, a location outside of the UK.

Under data protection legislation, we can allow your personal information to be transferred outside the UK if:

- The recipient is situated in a country that has been confirmed by the UK Government to provide adequate protection to personal information.
- The recipient has agreed (by way of a written contract or some other form of data transfer mechanism, in each case, approved by the UK Government) to provide all protections to your personal information as are required by data protection legislation.
- We have your explicit consent to do so.

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

## **6. Period for which data is retained**

The Trustees will retain personal data for periods determined in accordance with formal policies adopted from time to time laying down procedures for reviewing whether categories of personal data are still required to be retained for the purposes of effectively administering the Fund, including the provision of benefits under it and to comply with our legal obligations in relation to the administration of the Fund.

## **7. Data subject access requests**

All data subjects have a right:

- Access your personal information;
- Request rectification of inaccurate information;
- Request erasure (in certain circumstances);
- Restrict or object to processing;

- Request the transfer of your data to another organisation;
- Withdraw consent where processing is based on your consent.

Exercising these rights is subject to certain restrictions under the Data Protection Legislation. For further information about these rights, please contact us using the details set out in Section 10.

## **8. Cookies and Similar Technologies**

Our website uses cookies and similar technologies to support site operation and improve services.

- Essential cookies are cookies that are directly required to fulfil an action requested by you, such as logging in.
- Non-essential cookies (e.g. analytics, performance, marketing) are only set with your consent

For further information on our use of cookies, please see our Cookie Policy:

[https://www.uniapensionfund.co.uk/cookie\\_policy/index.html](https://www.uniapensionfund.co.uk/cookie_policy/index.html)

## **9. Complaints**

If you have concerns about how your personal information has been handled, you may:

- Complain to the Trustees first using the contact details below—your complaint will be acknowledged within 30 days and investigated promptly
- Complain to the Information Commissioner’s Office (ICO) at any time ([www.ico.org.uk](http://www.ico.org.uk))

## **10. Contact us**

If you have any questions about how your personal information is used, please feel free to contact us at the following address:

Sunlight House, 22 Eden Street, Kingston-upon-Thames, Surrey, KT1 2BA

Email address:

[ExpertPensions.Team@unilever.com](mailto:ExpertPensions.Team@unilever.com)

**May 2026**