

# P&O PRINCESS CRUISES PENSION SCHEME PRIVACY NOTICE

## **Trustee's commitment to your privacy**

Independent Governance Group (the trading name of Ross Trustees Services Limited, an independent professional trustee company) is the professional corporate sole trustee (the "Trustee") of the P&O Princess Cruises Pension Scheme (the "Scheme").

The UK's data protection legislation includes the Data Protection Act 2018, the General Data Protection Regulation 2018 as it was incorporated by the UK following on from Brexit ("UK GDPR" and the Privacy and Electronic Communications 2023 together the "data protection laws") and governs how personal information is used by organisations. The Trustee determines the purposes and means of processing personal data held for the purposes of the Scheme ("Scheme Personal Data") and as such is a controller as defined in the data protection laws ("Data Controller") of Scheme Personal Data for data protection purposes, particularly with regard to Scheme members and their beneficiaries. In this Privacy Notice the terms "we", "us" and "our" refer to the Trustee.

We take your privacy seriously, and we are committed to protecting it. This Privacy Notice explains how we will use any personal information that we collect from you or that is provided to us by you or a third party in connection with your membership of the Scheme, and certain rights and options that you have in this respect.

From time to time we may make changes to this Privacy Notice to reflect any changes to the way in which we process your personal information or changing legal requirements.

## **Information we may collect from you**

The Trustee may collect and process the following types of Personal Data, which you provide to us in connection with the Scheme:

- personal details such as your name, date of birth, email and postal address and national insurance number;
- family details such as whether you are married or in a civil partnership, and details about your children, dependents and other family members;
- employment details such as the pensionable pay you received while in employment, any bonuses you received, and your length of service;
- sensitive personal data, that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life and sexual orientation or details of criminal offences, or genetic or biometric data; and
- if you have already started receiving your pension we will hold information such as your bank account details and other data necessary for processing payments and fraud prevention.

## **Information we may collect about you from Carnival Corporation & plc, Fleet Maritime Services (Bermuda) or your previous employer if not employed by either of these entities during your period of contributory membership**

The Trustee may collect personal data about you from Carnival Corporation & plc / Fleet Maritime Services (Bermuda) or third parties (including your previous employer if not employed by either of these entities during your period of contributory membership) (your “Employer”). The personal data about you collected from your Employer includes the following information relating to your employment, salary and benefits:

- your contact details;
- your financial details;
- salary, annual leave, pension and benefits information; and
- details about your employment contract.

**Information we may collect about you from third-parties**

Periodically, the Trustee may collect personal data relating to you from the following third parties:

- regulatory authorities such as HMRC;
- the Pensions Ombudsman;
- a tracing agency who may use a range of public sources such as the electoral roll;
- your next of kin; and
- a medical practitioner (with your consent).

Some members within the Scheme receive benefits from the Scheme that are dependent on the benefits received in the Merchant Navy Officers Pension Fund. The Trustee will from time to time obtain personal data concerning relevant members from the Merchant Navy Officers Pension Fund.

**The purpose and legal basis for processing your information**

We use your information to ensure the effective, efficient and accurate management of the Scheme in accordance with the Scheme Rules and the law. This includes using your information to enable us to calculate and pay the correct pension benefits during your lifetime and on your death. We may use your information to enable us to communicate with you.

Except as disclosed below the table, the purposes for which we may process all of the above non-sensitive personal data, and the legal basis on which may perform such processing, are:

| Processing purpose  | Legal basis for processing  |
|---|---|
| Determining your eligibility to receive benefits under the Scheme | We have a legitimate interest in determining whether you are eligible for receiving benefits under the Scheme |
| Calculating and paying benefits under the Scheme                  | We have a legitimate interest in calculating and paying benefits to you and to your nominated beneficiaries   |

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| Communicating with you in relation to services that we provide to you  | We have a legitimate interest in communicating with you in relation to the services that we provide you   |
| Communicating and interacting with you via our websites  | We have a legitimate interest in communicating and interacting with you via our websites  |
| Establishing, exercising and defending our legal rights  | We have a legitimate interest in establishing, exercising and defending our legal rights  |
| For audit, compliance, controls and other risk management  | We have a legitimate interest in establishing, exercising and defending our legal rights  |
| Identifying issues with our existing services; planning improvements to existing services; and creating new services | We have a legitimate interest in identifying issues with our existing services; planning improvements to existing services; and creating new services |

We will also process personal data for the purpose of considering any nominees you have selected to receive death benefits under the Scheme. Where you provide us with personal information about others, you should inform the third party that you are doing this and share a copy of this notice with them, so they also understand how their data is processed. In these circumstances, references in this notice to data relating to you or about you should be read as references to data about those third parties which you provided to the Trustee on their behalf in the context of their future eligibility for benefits under the Scheme.

The legal basis for this processing will be our and the beneficiaries' legitimate interest in selecting beneficiaries of your death benefits under the Scheme. The only personal data we will be processing for this purpose will be:

- personal details such as name, address and date of birth;
- financial relationship including any financial interdependency; and
- banking details.

We may process Sensitive Personal Data for the following purposes and under the following legal bases:

| Processing purpose   | Legal basis for processing  |
|--|---|
| Considering your entitlement to an ill health retirement pension under the Scheme        | We have obtained your prior explicit consent to process your health data or we have a legal basis to process this information under employment, social security or social protection law  |
| Considering the entitlement of any named nominees to a lump sum benefit under the Scheme | We have obtained your prior explicit consent to process information about your marital status from which we may infer information about your sexual orientation or we have a legal basis to process this information under employment, social security or social protection law |

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| Detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law | We have a legitimate interest in processing personal data (including Sensitive Personal Data) for the purposes of preventing or detecting an unlawful act |
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If you have provided your specific consent to processing certain types of personal data, you may withdraw your consent at any time. You do not have to provide your consent, but if you choose not to give it (or to withdraw it), this may prevent us from processing and paying out the relevant benefit.

**Disclosure of personal data**

In the course of administering the Scheme, the Trustee may share your personal data with third parties, where this is necessary to administer the Scheme and/or comply with contractual obligations relating to it. We may share your information with the following third parties:

- Carnival Corporation & plc / Fleet Maritime Services (Bermuda) as employers of scheme members
- Isio Group Limited (Isio) who are responsible for the day-to-day administration of the Defined Benefit Section of the Scheme
- Scottish Widows Limited who are responsible for the day-to-day administration of the Defined Contribution Section of the Scheme
- Standard Life who are Additional Voluntary Contribution (AVC) providers to the Scheme
- Independent Transition Management (ITM) Limited who assist with tracing and ensuring our data is correct and up to date

The Trustee may also disclose your personal data to other third parties, for example in the event that the Trustee wish to enter a buy-out/buy-in of any of the benefits under the Scheme, in which case we may disclose your personal data to the prospective counterparty to such a transaction.

The Trustee may disclose your personal data to these third parties in connection with services provided by the third parties to the Trustee. These service providers are required to take appropriate security measures to protect your personal data in line with our policies. The Trustee does not allow service providers to use your personal data for their own purposes. The Trustee only permits the third parties to process your personal data for specified purposes and in accordance with the Trustee’s instructions.

In some contexts, we may disclose the personal data to the following third parties who will be data controllers in their own right, and directly responsible under data protection law for protecting the personal data:

- K. Farnum of Towers Watson Limited (part of the Willis Towers Watson Group), as Scheme Actuary, for the purpose of providing scheme actuarial services to the Trustee. For more information, the Scheme Actuary's privacy notice can be found at <https://www.willistowerswatson.com/en-gb/notices/How-Willis-Towers-Watson-uses-personal-data-for-actuarial-services-to-UK-pension-scheme-trustees>
- Clifford Chance LLP as the Trustee’s legal adviser for the purpose of providing legal advice to the Trustee

- Redington Limited for the purpose of providing investment services to the Trustee
- Cooper Parry Group Limited for the purpose of providing audit services to the Trustee
- The Pensions Regulator, the Pensions Ombudsman and HM Revenue & Customs if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation

In certain circumstances, we may be required to disclose or share your personal information with other third-parties in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, local or foreign regulators or to judicial or administrative authorities), or to protect or defend our rights or protect your rights or those of the public.

Any personal information held by us and any third-party will be treated as confidential. We will not sell your personal information to third parties.

### **International transfers of personal data**

The personal data that the Trustee processes about you may be transferred to one or more countries outside the European Economic Area ("EEA") (including the United States of America, India and Guernsey) and the Trustee will (and will ensure that where relevant each of its providers acting on behalf of the Trustee agree to) protect it from improper use or disclosure and ensure the same levels of protection are in place as are applied with in the UK and the EEA.

Data may be received from your Employer from the United States of America. Data may also be transferred to India to allow Towers Watson Limited to provide actuarial services to the Trustee. The United States of America and India have not yet been deemed by the European Commission to offer adequate data protection, but in line with the above the Trustee will seek assurances from its service providers that an adequate level of data protection is in place in these countries as required under the data protection laws.

### **Automated decision-making**

You have a right not to be subject to a decision based solely on automated processing, including profiling which has legal consequences for you or which significantly affects you. We do not envisage that any decisions will be taken about you using automated means and therefore this right should not arise. In the event that this position changes, we will notify you in writing.

### **Retention of personal data**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any pension scheme requirements and, where required for the Scheme to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. As an example, pension benefits build up and are paid over a long period. We will therefore need to retain your details until at least 6 years after the final benefits are paid in respect of you. If a spouse's or dependant's pension is payable on your death, this may mean that we keep your personal information for some time even after you have died.

We will not keep information longer than it is needed. Once your information is no longer needed, we will take reasonable steps to securely destroy it.

### **Your rights regarding your information**

In certain circumstances, under the data protection laws, you have the right to:

- Request access to your personal data.
- Request rectification of your personal data if it is inaccurate or incomplete.
- Request deletion of your personal data if there is no reason for its continued processing.
- Restrict the processing of your personal data (for example, if you want the Trustee to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data being processed.
- Request the transfer of your personal data to another party.
- Withdraw your consent to processing, in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. Once the Trustee has received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal.

If you want to access, rectify or request deletion of your personal data, object to the processing of your personal data, request that we transfer a copy of your personal data to another party, or withdraw your consent to processing (if applicable), please contact the Trustee in writing at the address given below.

### **Updates to this Notice**

The Trustee reserves the right to update this Notice and any other relevant policies or procedures at any time. Any substantial changes that we may make to this Notice in the future will be provided to you by our normal means of communicating with you which could be by email or by post. The Trustee may also notify you in other ways from time to time about the processing of your personal data.

### **Contact**

If you have any questions regarding your specific data and what is currently held on file for you or how we treat your personal information, or wish to update your personal information, please contact the Scheme Administrator, Isio, via email at [pocruises@isio.com](mailto:pocruises@isio.com)

If you have any questions concerning this Notice or the policies or procedures referred to above, please contact the Scheme Secretary, Simon Pettitt, at P&O Princess Cruises Pension Scheme, Carnival UK, Carnival House, 100 Harbour Parade, Southampton SO15 1ST or email [simon.pettitt@carnivalukgroup.com](mailto:simon.pettitt@carnivalukgroup.com). Simon Pettitt is employed by Carnival UK to act on behalf of the Trustee and will address any concerns you may have, and can provide any supplementary information on the roles and specific data protection policies of any third-parties who will be acting as data controllers or processors.

If you are dissatisfied with any aspect of the Trustee's handling of your personal data, we would be happy to address any concerns you have directly in the first instance. If you believe that we have not complied with applicable data protection laws and you have a need to escalate your concerns, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 or on its website at [www.ico.org.uk](http://www.ico.org.uk).