

PRIVACY NOTICE FOR THE BUSH BOAKE ALLEN PENSION SCHEME
(the “Scheme”)

International Flavours & Fragrances (Pension Trustees) Limited (the “**Trustee**”), as the trustee of the Scheme, holds and processes personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

What we do with your data

The Trustee, as a data controller, 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. This includes:

- calculating, administering and paying your benefits under the Scheme or following your death;
- processing ill-health retirement claims;
- dealing with any queries/complaints/appeals etc. regarding decisions we have made, for example in relation to your or your dependants’ entitlement to benefits under the Scheme;
- funding and de-risking the Scheme, and investing Scheme assets to provide benefits under the Scheme;
- carrying out actuarial valuations and investment of the Scheme’s assets; and/or
- compliance with legal, regulatory and good governance obligations and as otherwise lawfully permitted from time to time.

The legal basis for doing so is in order for the Trustee to comply with its legal obligations.

Whilst much of the data we hold has been provided by you, we also hold and process data provided by third parties such as Bush Boake Allen Limited and International Flavours & Fragrances (Great Britain) Limited as the Scheme’s sponsoring and participating employers (together the “**Companies**”), any other pension schemes or arrangements from which benefits have transferred, HMRC, the DWP and regulatory bodies and by tracing organisations. We also receive information from you about your proposed beneficiaries, who may be eligible to receive benefits on your death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the Scheme. The data we hold is to assist the Trustee in calculating and paying the benefits the members are entitled to.

What data is processed?

The data we hold about you (and your beneficiaries) is to assist the Trustee in calculating, administering and paying benefits and includes (but is not limited to):

- full name, age, gender, date of birth, national insurance number, passport or ID number, and or other governmental identification numbers;
- business and/or personal contact details, including address, telephone numbers and email addresses;
- financial information, including salary, tax information, pension or prospective pension entitlement, bank account details;
- employment details, including years of service, dates of employment, full or part time employment status, job band, salary, compensation, employee claims, bonuses and benefits;
- pension scheme status, including start date and leave date of joining the Scheme;
- your preferences in relation to your pension benefits; and

- marital status and relationship data, including the full name, date of birth, contact details and relationship to your family members, dependants and/or beneficiaries.

We also hold and process 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). We 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 our legal obligations in connection with employment, social security and social protection (as allowed by legislation). If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, the Scheme’s administrator (currently Hymans Robertson LLP (“**Hymans**”)), the Scheme actuary and actuarial team (currently Alec Day and Hymans), the Trustee’s legal advisers (currently CMS Cameron McKenna Nabarro Olswang LLP), the Company’s legal advisers, the Scheme’s auditor, life assurance providers, AVC providers, insurance providers, insurance and reinsurance companies (including Just Group PLC (“**Just**”) and Canada Life Limited (“**Canada Life**”)), investment managers, medical advisers, communications providers, tracing organisations, HMRC, and DWP.

A copy of Just’s fair processing notice can be found at: <https://www.wearejust.co.uk/globalassets/defined-benefits/documents/db-jrl-privacy-notice.pdf>.

A copy of Canada Life’s fair processing notice can be found at: <https://www.canadalife.co.uk/data-protection-notice/>.

In addition, we may make your personal data available to the Companies and any other employers associated with the Companies, or to companies and firms which are considering or have acquired one or both of the Companies or the whole or part of the Companies’ business, or the trustee(s), administrators or professional advisers of any pension scheme to or from which your rights under the Scheme may be, are being or have been transferred, or to any company participating in such a pension scheme.

Your personal data will also be released to other external parties if authorised by you, or as required or permitted by law, or to comply with a judicial proceeding, court order, request from the Pensions Regulator, Pensions Ombudsman or any other regulator or any other legal process served on or involving the Trustee.

In some circumstances we are joint controllers with the Scheme actuary, the Trustee’s legal advisers (who will process personal data to comply with their professional duties as advisors to the Trustee), insurers, auditors, benefit consultants and the Companies. The Companies hold and process your data to comply with their legal obligations as the sponsoring and participating employers of the Scheme. The Companies 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. The Trustee will share information with the Companies and their auditors and advisers for this purpose.

The Trustee, the Companies, Hymans and other advisers will from time-to-time transfer Scheme personal data to other countries, including outside the European Economic Area. Where transfers are made outside the European Economic Area, the parties involved will ensure that adequate safeguards are in place and details of these safeguards can be made available on request.

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. Our policy is therefore to retain information relating to you until your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 7 years. However, information will be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Hymans will hold on to your data for a maximum of up to 6 years after the termination of its contract with us. This is to protect themselves against any subsequent legal claims.

Your rights

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. You can exercise these rights by contacting the Trustee at:

International Flavours & Fragrances (Pension Trustees) Limited
c/o Hymans Robertson LLP
45 Church Street
Birmingham
B3 2RT

Email: BBA@hymans.co.uk

Tel: 0121 210 4333

Please notify us as soon as possible if there has been a change in your details (for example if your personal circumstances such as your nominated beneficiary or home address change).

Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However, if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

Contact details

If you want to know more about the information held by the Trustee, the purposes for which it is held or about the Scheme's data protection arrangements, please contact the Trustee using one of the following options:

International Flavours & Fragrances (Pension Trustees) Limited
c/o Hymans Robertson LLP
45 Church Street
Birmingham
B3 2RT

Email: BBA@hymans.co.uk

Tel: 0121 210 4333.

What if you have a complaint?

To make a complaint about how we have handled your personal data, please contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. This is in addition to and separate from the Scheme's internal dispute resolution policy. Its contact details are:

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

Telephone number: 0303 123 1113 or 01625 545 745

The Trustee reserves the right to amend this privacy notice from time to time.

3 August 2023