

## **Mercer and the Scheme Actuary's processing activities as data controller**

- (a) Mercer Limited ("Mercer") and the Scheme Actuary (currently John Hemsley) process personal data to provide actuarial calculations and advice requested by the Trustees and to comply with statutory and regulatory obligations and maintain accounts and records. Mercer also uses personal information for data analytics purposes, including to create insights, reports and other analytics to better understand and improve the quality of and market Mercer's advice, products and services. The output of such analytics does not identify particular clients or individuals.
- (b) Mercer and the Scheme Actuary collect and Process the following categories of Personal Data (including special categories of data) as data controllers:

Details such as a member's name, date of birth, gender, address, email address, telephone number, employer name, employment and pensionable service periods, salary, nature and details of current and historic pension arrangements, pension amounts, pension contributions, employee benefits, marital status, beneficiary details, bank details, national insurance number, medical records and/or ill-health status in relation to current, former and potential members of the pension scheme; beneficiaries of current, former and potential members of the pension scheme; and representatives of our client.

- (c) Except where Mercer (and the Scheme Actuary) must rely on its client obtaining Data Subjects' consent to the Processing, the legal grounds Mercer (and the Scheme Actuary) relies on in order to undertake such Processing are the "legitimate interests" ground, "compliance with a legal obligation" ground or "necessary for performance of a contract" ground.
- (d) Mercer and the Scheme Actuary shall retain Personal Data that it Processes in accordance with its document retention and deletion policies and as required by law or in order to defend any actual or possible legal claims.
- (e) Mercer is an affiliate of Marsh & McLennan Companies, Inc. "**MMC**", and "**MMC Group**" shall mean the corporate group of MMC. MMC has adopted processor binding corporate rules in the form of the Processor standard (the "**Standard**") in order to provide adequate safeguards for transfers of Personal Data from certain MMC Group Affiliates to certain non-EEA MMC Group Affiliates. The Standard will be made available at <https://www.uk.mercer.com//data-protection.html>.
- (f) The transfer of Personal Data outside of the EEA or a country recognised by the European Commission as providing an adequate level of protection for personal data, shall be covered by a framework recognised by the relevant authorities or courts as providing an adequate level of protection for Personal Data, including but not limited to binding corporate rules, Standard Contractual Clauses or the EU-US Privacy Shield Framework.
- (g) You can contact Mercer's Data Protection Officer (DPO) at any time if you have any questions about Mercer or its scheme actuaries' privacy practices. The DPO's details are:

Data Protection Officer  
Marsh & McLennan Companies, Inc.  
Tower Place West  
London  
EC3R 5BU