

# PRIVACY NOTICE

## Curtiss-Wright UK Pension Plan - DB Members

Updated: 24 October 2019

### Background

The Trustees of the Curtiss-Wright UK Pension Plan (the “Plan”) recognises that your privacy is important and we take our responsibility for safeguarding your personal data very seriously. We are also committed to being transparent about how we collect and use your data and to meeting our data protection obligations.

### Purpose

This privacy notice describes how the Trustees, as Data Controller, collects, uses and protects your personal data and your associated individual rights and obligations.

References to “Data Protection Laws” are to the EU General Data Protection Regulation (2016/679), the EU Privacy and Electronic Communications Directive 2002/58/EC as implemented in the UK, and any amending or replacement legislation.

We may need to update this privacy notice periodically. This version was last updated on the date stated in document header.

### Why We Process Your Personal Data

We will process your personal data and the personal data of other people (such as your dependants) provided by you, for the purpose of the governance and administration of the Plan, including in particular the calculation, funding, securing and payment of benefits.

We will normally rely upon **Legitimate Interests** as the legal basis for processing your personal data. This means that we will process personal data for the purpose of legitimate interests that we as Trustee (or a third party to whom we disclose the data in accordance with this statement) are pursuing – namely the governance and administration of the Plan. The legislation permits this, if the interests or fundamental rights and freedom of Plan members are not overridden by our legitimate interests.

### What Personal Data Is Processed

The Trustees collect and process a range of personal data about you. This includes:

- Your name, address and contact details, including email address and telephone number, date of birth and gender;
- Details of your bank accounts;
- Information about your marital status, spouse or partners, dependants, beneficiary information and emergency contacts;
- Information about your nationality including national identification numbers, place and country of birth;

## Special Category Data

To the extent that we need to collect, hold or otherwise process any special categories of data about you, we will ensure we have a lawful basis for such processing under Article 6 of the GDPR and that we also meet a separate condition for processing special category data under Article 9 of the GDPR.

## How We Collect Your Personal Data

We may collect and process personal data that you provide to us in connection with the Plan. This may include your contact details; information as to your date of birth, gender, and marital status; information as to your contributions to and options exercised under the Plan; information as to your family members and dependants; and (where benefits are payable to you) your bank details.

We may collect and process personal data about you from third parties. This may include information relating to your employment, salary and benefit rights, to the extent relevant for the purpose of the Plan. On certain occasions, we may collect personal data relating to you from third parties such as HM Revenue & Customs and other regulatory authorities.

## Principles for Processing Personal Data

As the data controller, we are accountable to you and to the supervisory authorities for how we process your personal data. We will observe and be able to demonstrate compliance with, the key principles of processing. Personal data will be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not processed further in ways incompatible with those purposes;
- Adequate, relevant to and limited to what is necessary. For example, we will not hold more information than is required for the specific purpose;
- Accurate and where necessary, kept up-to-date. Every reasonable step will be taken to ensure the personal data we hold is correct and not misleading as to any matter of fact;
- Not kept for longer than we need it. We comply with standard data retention periods that wherever possible, comply with documentation requirements;
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage;
- Processed in consideration of the requirements of accountability and the above mentioned principles of data processing, using appropriate technical or organisational measures.

## Sharing Your Personal Data

In connection with the administration of the Plan, we will engage or transact with pensions administrators, actuaries, accountants, lawyers, investment advisers, insurers (e.g. with a view to securing Plan benefits via insurance), investment providers and other similar external advisers, service providers and actual or proposed counterparties.

### Prime third party processors

- Aon PLC are the administrators for the Curtiss-Wright UK Pension Plan and they collect and process your personal information to deliver that service. If you would like further information about Aon PLC privacy and information handling practices, you can contact them directly at: The Data Protection Officer, The Aon Centre, The Leadenhall Building, 122 Leadenhall Street, London, EC3V 4AN or by email: [privacy@aon.com](mailto:privacy@aon.com). Aon PLC Privacy Notice is available via the following link: <https://www.aon.com/unitedkingdom/privacy.jsp>

We will disclose your personal data to these and other third parties in connection with the services which the third parties provide to us or otherwise for the purpose of the relevant transaction. We will ensure that personal data is processed in accordance with our instructions and in circumstances that require the recipient to observe industry standard security measures in respect of the personal data. We may be obliged to disclose your personal data to a third party in order to comply with a legal obligation.

We will not disclose personal data to third parties for the purposes of marketing and we do not envisage that any marketing decisions will be taken about you using automated means.

## Protecting Your Personal Data

The Trustees take the security of your personal data seriously and has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by the trustees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, we do so on the basis of contractually binding instructions. All third parties are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of your personal data.

The personal data that we collect about you may be transferred to, and stored at, or processed in one or more countries outside the European Economic Area (EEA) which have not yet been deemed by the European Commission to offer adequate data protection.

Personal data may be processed by staff operating outside the EEA who work for us, or for our third parties. In such cases, we will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under the GDPR. We will supply details of any such steps on request.

## Storing Your Information

Your personal information will be stored on secure servers or systems both within and outside the European Economic Area (EEA). Where your information is stored in countries outside the EEA or a country approved by the EU we will ensure it is protected by encryption during transmission.

## Record Retention

The Trustees will retain your personal data in accordance with legal and regulatory requirements. We will hold personal data of for as long as may be necessary in order to administer benefits and to maintain a record of steps we have taken. This means that we may retain personal data for very long periods, including after entitlement to receive benefits has ceased.

## Your Individual Rights

EU/UK data protection law governs the processing of personal data, so you have certain rights in relation to your personal data. You have the right to:

- Be informed about the collection and use of your personal data. You have received this information within this privacy notice;
- Access your personal data;
- Have inaccurate personal data rectified, or completed if it is incomplete;
- Have personal data deleted or destroyed in certain circumstances, for example if (i) it is no longer necessary for us to process your personal information for the purposes for which it was originally collected or (ii) you withdraw your consent to our processing, where consent is the only legal basis on which we rely to process your personal information or (iii) your personal information has been unlawfully processed or (iv) it is necessary for us to erase your personal information for compliance with applicable law;
- Request the restriction or suppression of the processing of your personal data;
- Data portability that allows you to obtain and reuse your personal data for your own purposes across different I.T. services;
- Object to processing that is likely to cause, or is causing you, damage or distress. You have an absolute right to stop your data being used for direct marketing purposes;
- Understand whether we are conducting automated decision-making or profiling and the logic involved in any such decision-making or profiling.

You should be aware that not all your data subjects' rights are absolute and will apply in certain circumstances only. For example, we are obliged to maintain certain records for legal reasons and in this scenario, you would be unable to have data deleted or destroyed.

## How you can access your information

To exercise your rights you will need to make a Data Subject Access Request (DSAR) verbally or in writing to the DPO (details below). We will respond to a request without undue delay and at the latest within one month from the date it is received.

Once satisfied the request is genuine, a process that may include identity verification of the requestor, we will provide the data subject with an electronic copy of the personal data requested.

We reserve the right to extend the time to respond to a DSAR by a further two months if the DSAR is complex or the data subject has submitted a number of requests. In the event an extension is deemed necessary, we will inform the data subject within one month of receiving the DSAR and explain why the extension is necessary.

If a DSAR is manifestly unfounded or excessive, we are not obliged to comply with it. Alternatively, we can agree to respond but will charge a fee, which will be based on the administrative cost of responding to the request. A DSAR is likely to be manifestly unfounded or excessive where it repeats a request to which we have already responded. If an individual submits a request that is unfounded or excessive, we will notify the data subject that this is the case and if it will receive a response.

If you have concerns with how we are using your information or how we have responded to your request, you may register such concern with the DPO using the details below. Alternatively, you have the right to complain to the supervisory authority that protects the personal data in the country where you are resident.

## Obligations to Supervisory Authorities

We will respond diligently and appropriately to requests from supervisory authorities about this privacy notice or any query or investigation concerning our compliance with applicable data protection laws.

## Data Privacy Support

Should you need local and general data privacy guidance, you can visit the website of the supervisory authority that protects the personal data in the country where you are resident. However, if you need specific data privacy advice or you have questions about this policy notice or any other aspect of data privacy, please contact the DPO:

- By Post                      Data Protection Officer  
   The Trustees of the Curtiss-Wright UK Pension Plan  
   15 Enterprise Way, Aviation Park West, Christchurch, BH23 6HH, UK.
- By Email                      [dpo@curtisswright.com](mailto:dpo@curtisswright.com)
- By Telephone                +44 (0) 1202 034000