

Monsanto Pension Plan Data Protection Policy

1. Introduction and General Terms

- (a) This data protection policy sets out how the trustee of the Monsanto Pension Plan ('the Plan'), Independent Trustee Services Limited, whose registered office is at 1st Floor Buckhurst House, 42-44 Buckhurst Avenue, Sevenoaks, Kent, TN13 1LZ ("**Trustee**", "**we**", "**us**", "**our**") obtains, uses and protects any personal information that you provide to us, or that is otherwise obtained or generated by us, and which relates to you or to any individual connected with you. The Trustee is the "data controller" in respect of personal data processing for the administration of the Plan.
- (b) This data protection policy explains the following:
- Paragraph 2 - what personal information we may collect about you;
 - Paragraph 3 - how we keep your personal information safe including when we transfer it across borders;
 - Paragraph 4 - what we may use your personal information for;
 - Paragraph 5 - how long we retain your records;
 - Paragraph 6 - who we may share your personal information with;
 - Paragraph 7 - your rights regarding the personal information you provide to us;
 - Paragraph 8 - what if you do not provide us with your personal information;
 - Paragraph 9 and 10 - technical information that we may collect about you and the use of cookies on our website;
 - Paragraph 11 - how we make changes to our data protection policy; and
 - Paragraph 12 - how to contact us.

2. Personal Information we may collect about you

What types of personal information may we collect about you?

- (a) Personal information broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual. This would therefore include any information provided to us in relation to your or another's actual, past or potential membership of the Plan.
- (b) We may hold any or all of the following personal information about you:
- personal details such as your name, gender, age, date of birth, email address, postal address, telephone or mobile number, description of physical or mental health and identifiers such as National Insurance number and your employee number;
 - family, lifestyle and social circumstances such as details about your current marriage, civil partnership or relationship status, marital or relationship history, details of your family, spouse, partner, dependents and potential dependents, and persons who we may contact in the event we are unable to contact you;
 - details of your legal or personal representatives and the executor and beneficiaries of your will;
 - employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, attendance record, health and safety records, security records, job title and job responsibilities;

- financial details such as you or your family members' or dependant's income, salary, assets and investments, bank account details to process pension payments, state benefits, grants and insurance details; and
- technical information and other information about your visits to our website – you can find more information about this in paragraphs 9 and 10, below.

We may also process other information about you which reveals information about your health status and gender status, such as information related to your physical or mental health, including the provision of health care services (“Sensitive Information”). Where we collect these types of information about you, we will take appropriate steps to get your consent to our collection and use of this information.

How do we collect personal information about you?

- (c) We collect your personal information when you, your employer, a member of the Plan or another person contacts us online, by phone, text, email or post. We obtain your personal information where this is provided through any other engagement or correspondence that you, your employer, a member of the Plan or another person may have with us. We may also obtain your personal information through the use of third party tracing services where we believe that we hold inaccurate data for you.

3. Keeping your personal information safe

Password protection

- (a) All members can access the Plan website via an external web link. You need a username and password for this. HM Government's National Cyber Security Programme recommends making your password stronger by using three random words, and numbers/symbols if needed. Please avoid using the same password for multiple online accounts.
- (b) If you are using a computer or terminal in a public location, we recommend that you always log out and close the website browser when you complete an online session for your security.

Transfers of your personal information

- (c) We may transfer, store, or process your personal information at a destination outside the European Economic Area (EEA). Where the countries to which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of the UK, we will take reasonable steps to ensure that your personal information is treated securely and in accordance with this data protection policy. This may include entering into data transfer agreements based on the model clauses approved by the European Commission, to ensure that third parties to whom we transfer personal information in those countries nevertheless commit to ensuring an adequate level of protection for your personal information. Further details of the safeguards used by us in respect of subject transfers outside of the EEA are available on request.
- (d) Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the safety of your personal information transmitted to our website; any transmission is at your own risk. Once we have received your personal information, we will use reasonable procedures and security features to try to prevent unauthorised access.

4. What we may use your personal information for

- (a) The Trustee may use your personal information for the following purposes:
- to administer the Plan including to process data to calculate and pay benefits;
 - to carry out our obligations arising from any agreement that we have with, or concerning, you and to provide you with information, benefits and services;

- in connection with the purchase of Plan investments, including investments such as “buy-in” agreements with insurance companies;
- in relation to any correspondence related to the administration of the Plan (including queries relating to your membership of the Plan, communications with nominated or appointed Trustees and communications when we are unable to contact members of the Plan);
- to notify you about our services and changes to our services;
- for statistical, financial modelling and reference purposes;
- for internal record keeping;
- risk management including credit risk analysis, know-your-client and anti-money laundering checks;
- complying with any present or future law, rule, regulation, guidance or directive, and complying with any industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by local and foreign regulators, governments and law enforcement authorities, and complying with any subpoena or court process, or in connection with any litigation;
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving the Plan;
- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;
- to process Trustee nominations; and
- to analyse and improve the activities, services and information offered by www.mypfizerpension.co.uk (including through the collection and analysis of feedback).

We use your personal information in the ways described above for one or more of the following reasons:

- (b) we need to comply with a legal or contractual obligation to which we are subject, including giving effect to provisions of your contract of employment relating to the provision of benefits from the Plan and for the purposes of giving effect to legal obligations that apply to the Trustee in connection with the Plan; and/or
- (c) it is necessary in our legitimate interests (or those of a third party) to do so, and your interests and fundamental rights do not override those interests. Our legitimate interests include:
 - to provide your benefits under the Plan;
 - so that we can provide any clarification or assistance in response to your communications;
 - to serve you better as a Plan member;
 - to manage matters associated with the provision of your benefits under the Plan, including so that you are aware of your benefits and entitlements;
 - to comply with our legal obligations relating to record retention;
 - so as to ensure that we pay the correct benefits at the correct time;
 - to manage the risks to the Plan so that we can help to make your pension safe;

- to comply with all laws, guidance and codes that apply to us, as well as with data requests from regulators, governments, courts and law enforcement authorities;
 - to manage the Plan (including, without limitation to comply with our legal obligations in connection with the Plan, whether under the Plan’s governing legal documents, legislation, common law, or otherwise);
 - to try to minimise any disruption to the Plan if there is ever a change to our business; and
 - to be able to monitor the way in which our website is used, as this will help us to improve your experience on these websites.
- (d) In most cases, the processing undertaken by the Trustee and other processors on its behalf is both (a) in the legitimate interests of the Trustee as data controller and (b) necessary in order to comply with legal and contractual obligations to which the Trustee is subject.
- (e) The Trustee has the trust-based obligation to administer the Plan in accordance with the Plan’s trust deed and rules in order to discharge the proper purposes of the trust, including the provision of pension and related benefits. Personal data of Plan members, family members and others is required to discharge these trust obligations.
- (f) Where processing is carried out in the legitimate interests of the Trustee, the Trustee understands that it must balance its legitimate interests against the interests, rights and freedoms of data subjects. Personal data is required to provide members with pension and related benefits and the Trustee therefore believes that the processing of data is justified on the basis of its legitimate interests in administering the Plan.
- (g) The Trustee believes that the processing undertaken is necessary for the stated purposes and is targeted and proportionate. The Trustee does not seek to collect unnecessary information and does not use personal data for secondary or unrelated purposes. The Trustee also believes that its data processing is in line with standard industry practice.

5. **How long we retain your records for**

We will hold your personal information (and any personal information collected in respect of any individual connected with you) on our systems for as long as necessary to fulfil the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements. This can be for considerable periods of time even after a member or beneficiary leaves the Plan or dies. The period may depend on the type of data and the purpose for which it is held.

6. **Who we may share your personal information with**

- (a) We may share or disclose your personal information to any of the following recipients:
- the sponsoring employers and the counterparties to the Plan’s investments;
 - in certain circumstances, your data may be passed to service providers and professional advisers: including, the Plan actuary, legal adviser, auditor, covenant adviser, investment counterparties and/or administrator (and, where relevant, any sub-contractors of any of these entities or providers);
 - a member’s independent financial adviser or legal adviser;
 - local or foreign regulators, governments and law enforcement authorities;
 - local and foreign courts, tribunals and arbitrators or other judicial committees;
 - insurance companies and their reinsurers;
 - persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change involving the Plan (including any potential or actual purchaser and their advisors).

- (b) If we share your personal information in this way, we require the transferee to implement appropriate security measures to protect your personal information and to treat it in accordance with the law. Except where the transferee is a data controller in its own right, we only permit the transferee to process your personal information in accordance with our instructions.
- (c) From time to time, our website may contain links to other websites, including of our partner organisations. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these organisations or their activities. Please check these policies before you submit any personal information to these websites.

7. **Your rights regarding the personal information you provide to us**

- (a) The nature and accuracy of the information we hold about you is important to us. You have the right, in accordance with the law:
- to withdraw your consent to the processing of your personal information, to the extent it is processed on the basis of your consent (as set out in paragraph 2 above);
 - to request information regarding the processing of your personal information, including to be provided with a copy of your personal information;
 - to request the correction, completion and/or deletion of your personal information;
 - to restrict the processing of your personal information;
 - in relation to personal information processed on the grounds of (i) being necessary for performance of a task carried out in the public interest or in the exercise of official authority vested in the Trustee or (ii) legitimate interest of the Trustee or third party, or where personal information is processed for direct marketing, object to the processing of your personal information;
 - to request to obtain and reuse your personal information for your own purposes across different services where that personal information is processed by the Trustee by automated means and based on consent; and
 - to complain to your local data protection authority, or to a court of law, if your data protection rights are violated. You may be entitled to claim compensation as a result of unlawful processing of your personal information.
- (b) If you would like to express any of your rights described above, please let us know by emailing us at Pfizerpensions@capita.co.uk or contact us below:

Pfizer UK Pension Arrangements
Capita
PO Box 555
Stead House
Darlington
DL1 9YT
Freephone: 0800 328 4233
Overseas: 0114 229 7631

8. **What if you do not provide us with your personal information**

- (a) We may not be able to perform actions necessary to achieve the purposes set out above and you may not receive pension benefits and other services the Trustee provides if:
- you do not provide us with the personal information that we may need to comply with our statutory or contractual obligations; or

- you refuse, or subsequently withdraw, your consent to your Sensitive Information being processed, transferred or disclosed.

9. **Technical information that we may collect about you**

- (a) When you visit our website, we may collect technical information about your computer, such as your internet protocol address (which is a number that can uniquely identify a specific computer on the internet), browser type and version, browser plug-in types and versions, operating systems and platforms. We may also collect information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.
- (b) You can find more information about the types of technical information that we collect about you, in our Cookies Policy below.

10. **Cookies Policy**

- (a) For full details on the cookies policy please visit:

<https://www.capitaemployeesolutions.co.uk/cookies-privacy/>

- (b) Cookies are small text files sent by websites to your computer, or other access device, that can be used to make a user's experience more efficient. The law states that we can store cookies on your machine if they are essential for us to provide services you have requested on this website, but that for all other cookies we need your permission to do so. We use essential cookies to ensure you get the best experience whilst using this website.

Essential cookies

- (c) We may store information using cookies which we can access when you visit our site in future. The cookies listed below are essential to the functionality of the site. You can access them through some types of browser.
- (d) If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies. You can also block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. Please note, however, that deleting our cookies or disabling future cookies may prevent your access to some or all areas and features of the website.
- (e) To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit aboutcookies.org.

Non-essential cookies

- (f) These cookies are used by Google Analytics to measure site traffic and help enhance the site. We don't allow Google to use or share our analytics data and personal information is not gathered.
- (g) By continuing to browse our website, you are agreeing to our use of cookies.
- (h) Please note that third parties (including, for example providers of external services like Google Analytics web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies, but may include other types of cookies.

11. **Changes to our data protection policy**

From time to time, we may update this privacy notice and the data protection arrangements described above. If we make any substantial changes, we will provide you with a new version of this notice by

posting on this page. Please check back frequently to see any updates or changes to our data protection policy. Any changes to this data protection policy will become effective when we post the revised data protection policy on our website. The date of the most recent revisions will appear on this page. Your use of the website, or continued participation in the Plan following these changes means that you accept the revised data protection policy.

12. **Contact**

If you have any questions, comments or requests regarding any aspect of this data protection policy, please do not hesitate to contact us at:

Pfizerpensions@capita.co.uk

Pfizer UK Pension Arrangements
Capita
PO Box 555
Stead House
Darlington
DL1 9YT

Freephone: 0800 328 4233

Overseas: 0114 229 7631

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