

January 2021



ICI Data Protection

The Trustee (ICI Pensions Trustee Limited), whose registered office is at 5th Floor, 36-38 Botolph Lane, London EC3R 8DE, is the “data controller” in respect of personal data processing for the administration of the Fund.

In processing your personal data, the Trustee may:

- process your sensitive personal data such as information regarding your health records;
- pass on personal data to third parties which may include the Fund’s sponsoring employer, professional advisers, administrator, insurance companies, counterparties to Fund investments, as may be necessary or desirable for the operation of the Fund;
- transfer your personal data outside the UK or the European Economic Area (EEA) to a jurisdiction that may not offer an adequate, or equivalent, level of protection according to the laws of your home jurisdiction. However, in the event that your personal data is sent outside the EEA, the Trustee will still process your personal data in accordance with the applicable data protection laws, and will take reasonable steps to ensure that your personal data is handled securely; and
- retain your personal data for legitimate business reasons or to comply with applicable laws.

In certain circumstances, your personal data may be passed to the Fund actuary and Willis Towers Watson and, where this is the case, the Fund actuary and/or Willis Towers Watson may also be data controllers of your data.

You can find more information about the Fund actuary’s and Willis Towers Watson’s use of data in their data protection policy at www.willistowerswatson.com/personal-data.

You can find out more about how the Trustee uses your personal data and your rights with respect to that personal data in our data protection policy at www.icipensionfund.org.uk.
