

Unilever Pension Plan OFF

Privacy Notice - GDPR

Background

The Directors of the Unilever Pension Plan OFF (UPP) are required to collect and use personal data in order to administer the plan effectively. In this document, the Directors of the UPP are referenced as the “UPP”. The UPP is the ‘Data Controller’ within the meaning of GDPR (the European General Data Protection Regulation) and decide which personal data is processed, the reason for the processing and the way in which the personal data will be processed.

Purpose of processing personal data

The UPP uses the personal data of plan members and beneficiaries, including spouses/partners and children where applicable (‘Data Subjects’). In addition, the UPP can process the personal data of any person that the UPP conducts business with such as suppliers and professional advisers.

The personal data processed by the UPP is used to administer the plan effectively, in order to calculate and pay benefits due to its members and beneficiaries. The legal grounds for the processing of the personal data, is the performance of an agreement to which the data subject is a party and the legal and contractual obligation to carry out the processing. This includes but is not limited to pension agreements. If appropriate personal data is not received by the UPP, the plan may be unable to provide some or all of the benefits to which a member is entitled.

In addition, the UPP uses the personal data for:

- maintaining or being able to maintain contacts with those involved;
- informing data subjects about their personal situation, including information about the pension scheme(s) applicable to them, the amount of pension accrual/benefit and the consequences of changes in work or private situation;
- the management of the UPP;
- internal analyses;
- compliance with legal obligations to which the data subject and/or the pension fund are subject.

Personal data used

The personal data on ‘Data Subjects’ that the UPP uses to administer the plan includes:

Data	Obtained from
Name	Employer
Address and other contact details	Employer/Employee
Date of birth	Employer/Employee
Gender	Employer/Employee
National Register number (if any)	Employer/Employee
Language	Employer/Employee
Marital (or relationship) status	Employer/Employee
Date when marriage/partnership commenced	Employer/ Data subject



Date of any ending of the marriage/partnership	Employer/Employee
Name partner + date of birth (if any)	Employer/Employee
Name children + date of birth (if any)	Employer/Employee
Salary and/or salary scale	Employer
Part-time percentage	Employer
Operating company	Employer
Date when joined company	Employer
Date when left company	Employer
Personnel employee ID number	Employer
Bank account details	Employee/ Data subject
Any copies of the proof of identity	Employee/Data subject
Any life certificates	Pension beneficiary
Court orders	Data subject
Benefit Entitlements	The plan

In addition, the UPP processes the following personal data:

- Amount of pension and pension rights;
- Any amount of capital;
- Any amounts relating to incoming and outgoing transfers of pension rights;
- Any data relating to pension deductions.

Special personal data

In certain, limited cases, the UPP uses so-called 'special personal data' and these are:

Data	Obtained from
Data relating to degree of incapacity for work	Employer/Participant
Effective and end date of incapacity for work	Employer/Participant

The UPP collects only adequate, relevant and necessary personal data that is needed for the effective administration of the plan. All personal data that the UPP collects, records or uses in any way will be the subject of appropriate safeguards to ensure that the UPP complies with data protection laws. The UPP will ensure that any third parties, who carry out activities on its behalf, have implemented adequate safeguards for the protection of the personal data that the UPP is responsible for.

The UPP records:

- the third parties to whom personal data has been provided;
- the personal data that has been provided to these third parties.

All personal data will be treated confidentially and handled with care. The systems and data bases are protected in order to prevent unauthorised parties from gaining access to the “Data Subjects” personal data. All individuals processing personal data are obliged to keep this data confidential.

Sources of personal data

The data processed by the UPP is provided primarily by the “Data Subjects” themselves. Information may also be provided by employers of plan members, other pension schemes and



pension providers, independent financial advisers, local government agencies and any other advisers with whom the UPP communicate in relation to the administration of the plan.

Persons to whom the personal data may be disclosed

The UPP may disclose personal data to third party providers, where required, in order to administer the plan, and to regulatory authorities, insurers and employers of the “Data Subjects”. These third parties may transfer personal data outside the European Economic Area. The UPP has contracts with all third parties confirming that the service providers agree to comply with certain obligations under the data protections laws, primarily in relation to security measures surrounding the data that they process for the UPP.

Retention period

Personal data will be retained as long as the “Data Subjects” can assert any rights with respect to the UPP. In practice, this means that personal data is retained for a period of time in accordance with local legislation for the purpose of administering the plan.

“Data Subjects” rights

All “Data Subjects” have the right to inspect his or her personal data and is entitled to have his or her personal data corrected or deleted. If a “Data Subject” wants to exercise this right or wish to contact the UPP about their personal data, they should submit a written application to the UPP Plan Secretary. This application should be addressed to:

UPP Plan Secretary:
Unilever Pension Plan OFP
Boulevard Industriel 9, 1070 Brussels, Belgium
Email: GPT@unilever.com

The UPP is obliged to provide the requested data, within one month of receipt of the request, and will do so free of charge. This period may be extended by two further months where necessary, but the UPP will inform the “Data Subject” of any such extension within one month of receipt of the request, together with the reasons for the delay.

If it turns out that the stakeholder’s personal data is incorrect, incomplete or irrelevant then he or she is entitled to submit an additional request to have his or her data amended, added to or to have deleted any data that is considered not to be relevant. The UPP will grant this request as soon as possible, if and in so far as checks have shown, that the request is well-founded.

If the “Data Subject” does not agree with the way in which the Directors of the UPP are fulfilling their obligations under the privacy legislation then the “Data Subject” can submit a complaint to the Data Protection Officer (DPO) of the UPP.

Mr. Yves Van Hecke
DPO – Unilever Pension Plan
Sint-Michielskaai 9
2000 Antwerp
Belgium
yvanhecke@me.com or DPO-Pensions.Belgium@unilever.com



If the “Data Subject” does not agree with the opinion of the Data Protection Officer of the UPP, the “Data Subject” can submit a complaint to:

Data Protection Authority
Drukpersstraat 35
1000 BRUSSELS
Belgium
contact@apd-gba.be
Tel.: (+32) (0)2 274 48 00

Changes to privacy notice

The UPP reserves the right to amend the privacy notice in the light of changes in legislation or regulations or as the result of case law.

Adopted by the Board on 21 September 2023