

IHG UK Defined Contribution Pension Plan (“the Plan”)

Personal data privacy statement

As Trustee of the Plan, we hold personal information about members of the Plan and, where applicable, their dependants and beneficiaries. The Trustee is the ‘data controller’ of the Plan’s personal data.

What personal data is held

We hold some, or all, of the following types of personal information about you:

- Your name, date of birth, gender, National Insurance number and bank account information.
- Your home address and other contact details.
- Details of your employment history with IHG including details of your salary.
- Your marital status and marital history, your nominated beneficiaries and other information the Trustee may need to pay any death benefits due in relation to you.
- If your benefits from the Plan form part of a divorce settlement, details of that settlement.
- Your membership details of pension arrangements outside of IHG.

How that information is used and who it is shared with

The Trustee needs to hold and process information about you in order to run the Plan and pay benefits. In legal terms, this means that we have a legitimate interest in holding and processing the above information. Our legitimate interests may include:

- providing any clarification or assistance in response to your communications;
- improving our service to you as a Plan member or beneficiary;
- ensuring that you are aware of your benefits and entitlements;
- complying with our record-keeping duties;
- ensuring that we pay the correct benefits at the correct time;
- managing the risks to the Plan so that we can help to make your pension safe;
- complying with all laws, guidance and codes that apply to the Trustee and/or the Plan, as well as with data requests from regulators, governments, courts and law enforcement authorities;
- minimising disruption to the Plan if there is ever a change to our business; and
- monitoring the way in which our website is used, to help us improve your experience on the website.

We also keep the above information in order to allow us to comply with our obligations to members under the Plan’s governing documents, as well as under relevant legislation. The data is generally collected from you or your employer, however we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman or someone acting on your behalf, such as an independent financial adviser.

We may use your 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 the information, benefits and services;
- in relation to any correspondence related to the administration of the Plan (including queries relating to membership of the Plan);
- to notify you about our services and changes to our services;
- for internal record keeping;
- risk management;

- 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, recognition or similar change involving the Plan;
- to process Trustee nominations; and
- to analyse and improve the activities, services and information offered by the Plan administrator's online administration site.

We will only use your personal information for the purposes for which we collected it, unless we reasonably need to use it for a different reason that is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will explain the legal basis which allows us to do so.

Personal data relating to the Plan is held on paper and on computer systems. As the "data controller", we must process this information fairly and lawfully.

The Trustee is not allowed to share personal data about you with other organisations and people, unless the law allows us to do so or you have given your consent. As we need to share information with others in order to provide you with benefits, there is a legitimate interest in the Trustee sharing this information. Therefore, we may share your personal information with various people, including: any new trustees; employers; the Plan administration team; the Plan's professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; printers; mortality tracing agencies; IT service providers, and other third parties as required by law – for example, local or foreign regulators, governments and law enforcement authorities; local and foreign courts, tribunals and arbitrators or other judicial committees. If your pension is transferred to another scheme, we will also need to provide the administrators of that scheme with information about you.

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.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent, and we will do so where that is necessary to run the Plan in a sensible way. In the event that we ask for consent, you can withdraw your consent at any time by contacting us using the contact details given below. This may affect what we can do for you, unless we have another lawful reason for using your information.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Plan.

How long we keep personal data for

We must keep all personal data safe and only hold it for as long as necessary. To meet the requirements of both UK tax and pensions law, we must keep certain personal data (for example, details about the date a member joins the Plan, their name and address, and details of benefits paid) for a minimum of 6 years. But, given the nature of pension schemes, the Trustee may be required to keep some of your

personal information for the lifetime of the Plan and/or any future replacement pension arrangements so that we have the information we need in order to pay your benefits and to answer queries relating to your benefits.

We review the personal data held in relation to the Plan on a periodic basis in accordance with our data retention policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

Keeping your personal data safe

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also have procedures in place to deal with any suspected data security breach, should one arise.

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 notice. 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 commit to ensuring an adequate level of protection for your personal information.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You should be aware that taking any of the above steps could impact on the payment of your benefits and/or your participation in the Plan.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Queries and further information

If you would like more information about what we do with your personal information and what your rights are, you can contact the IHG Pensions Team:

Email: enquiries.pensions@ihg.com

Post: IHG Pensions Team, No 1 First Avenue, Centrum 100, Burton upon Trent, DE14 2WB

You have the right 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.

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.

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.