

Rentokil Initial 2015 Pension Scheme

Privacy notice for General Data Protection Regulation (GDPR)

This notice sets out how we use personal information about members of the Scheme (“you”), and your dependants and nominated beneficiaries. Please see the section ‘*Collection of your information*’ for the type of information we hold about you, and ‘*How we use your information*’ for the reasons for which we use your information.

We are the trustee of the Rentokil Initial 2015 Pension Scheme, Rentokil Initial Pension Trustee Limited. We are committed to protecting your information and acting in accordance with your rights under data protection law.

Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- records of communications with you (including any complaints); and
- in some cases, special categories of personal data such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Whilst much of the information we hold has been provided by members themselves, we also obtain information from your employer, other pension schemes which you may have transferred from, from HMRC, the Department for Work and Pensions and regulatory bodies, our medical advisors, and from tracing organisations.

Where applicable, we also collect information about your dependents or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

How we use your information

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits or valuations for divorce, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;
- b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud;
- c) for meeting our on-going regulatory and compliance obligations, and investigating or preventing crime;

- d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme;
- e) when we undertake activities from time to time to help us manage the liabilities of the Scheme, such as obtaining life insurance, longevity hedging, scheme mergers, bulk transfers, pension increase exchanges and enhanced transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) necessary for our legitimate interests in pursuing the purposes set out in (a) to (e) above, and (when we make the disclosures to Rentokil Initial plc and its subsidiaries for the audit and corporate transaction purposes referred to below) necessary for Rentokil Initial plc and its subsidiaries' legitimate interests in prudential management and meeting accountability and regulatory requirements, such interests in each case not being overridden by your privacy interests;
- (ii) required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- (iii) necessary for the performance of a task carried out in the public interest;
- (iv) when we use special categories of personal information, necessary for making a determination in connection with eligibility for, or benefits payable under, the Scheme (where authorised under local or EU law), for preventing fraud or other unlawful acts, for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain; and
- (v) processed with your consent which we obtain from you from time to time, such as when we consider requests by you to access your benefits on the grounds of ill-health (which may require us to consider information – with your consent – about your medical condition), when you ask us to make disclosures or allocate benefits or where the Scheme rules require you to provide information which we cannot otherwise process without your consent.

Where the personal information we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal information we may be unable to record or pay your or your beneficiaries' benefits. We will identify any such "required" data to you when we seek to collect it.

Disclosures of your information

We share information with the following recipients:

- our suppliers, including Rentokil Initial plc and its subsidiaries and other providers of services to us and them, such as administrators (Capita), financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the scheme actuary (Aon Hewitt) (for actuarial calculations), and printing, communication, IT and hosting, marketing, and tracing providers (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);

- Rentokil Initial plc and its subsidiaries, who will use the information for audit purposes, in relation to corporate transactions initiated by Rentokil Initial plc and its subsidiaries, and to allow you to flex your benefits including your pensions options; insurance and reinsurance companies, when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- others persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Transfers of your information abroad

The use and disclosure of your information, including for the purpose referred to in (e) above, may involve transferring your information outside of the European Economic Area. In those cases, except where the relevant country has been determined by the relevant public authority to ensure an adequate level of data protection, we will ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the European Commission or (where applicable) relevant authority in the United Kingdom. Further details of these transfers including copies of any data transfer agreements we use are available from us on request.

Retention of your information

We keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our record retentions policy. We determine the period for keeping your information with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests.

We hold information in accordance with our data retention policy. Generally we retain your information for a period of 7 years following termination of our relationship with you. In certain circumstances, we will be required to keep your information for longer than this period. The circumstances in which we may keep your information for longer include (amongst others) where there are benefit queries, refunds of contributions, ongoing litigation or statutory retention periods.

Your rights

You have rights under data protection law of access to, and rectification or erasure of, your personal data and to restrict its processing, and (in some circumstances) to require certain of your information to be transferred to you or a third party.

You also have the right to object to the processing of your information in some circumstances, and to tell us that you do not wish to receive marketing information.

You can exercise any of these rights by contacting us at the details set out below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent. You can notify us of your withdrawal of consent by contacting us at the details set out below.

You can also lodge a complaint about our processing of your personal information with a supervisory authority in the Member State where you habitually reside or work, or where a breach

has taken place. Details for the office of the Information Commissioner in the UK are available at www.ico.org.uk.

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, for example to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was updated in May 2018. It is non-contractual. We reserve the right to amend it from time to time, and will take appropriate steps to bring any such amendments to your attention.

Rentokil Initial Pension Trustee Limited
Compass House
Manor Royal
Crawley RH10 9PY

Contact: **Debra Hayes, Group Reward, Pension & Benefits Director**
Email pensions@rentokil-initial.com

Aon Hewitt Limited Privacy Notice

Aon Hewitt Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme.

In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting us, including reference to the scheme name, at: Data Protection Officer, Aon Hewitt Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH