

## Who we are

We are **ConocoPhillips Pension Plan Trustees Limited** (referred to as the 'Trustee', 'we', 'us' or 'our' in this notice). We are the trustee of the ConocoPhillips Pension Plan (the 'Plan'). As the Trustee of the Plan, we hold certain personal data about (i) you, as a Plan member or beneficiary, and (ii) where applicable, your dependants and beneficiaries. Personal data is information from which you, as an individual, can be identified. Most of the information held about you and processed by or for us in running the Plan is personal data.

Personal data is subject to certain protections under UK data protection law. Under that law, we are the 'data controller' in respect of the personal data that we, or our service providers, process. This means we decide the purposes for and how the personal data we hold about you and other Plan members and beneficiaries is processed.

## What information we collect about you and how we collect it

We may collect and process some of or all the following categories of personal data about you:

- Name
- date of birth and age
- gender
- relationship status (including marital and civil partnership status)
- address and other contact details
- birth/adoption/guardianship certificate or details
- tax information (including national insurance number, PAYE details and contracting out record)
- details of your bank or building society account (to pay benefits)
- relevant employment and remuneration information
- identification information (including passport/ID card number)
- details about your Plan membership and benefits payable to or in respect of you
- medical and other details about your health
- details about your dependants and beneficiaries
- the recording of any telephone call that you participate in that is received by or made by the Plan's administration team
- other personal information that is relevant for the purposes of administering the Plan

We often receive this information because you share personal data with us. Other sources of this information may include your spouse, civil partner, partner or other relatives, your employer, former employer, our advisers, government agencies, any former pension scheme trustee or manager and our service providers including those providing tracing, existence checking and data cleansing services.

As we will likely receive data about your dependants and your partner, spouse or civil partner, you should ensure that any such adult individual is aware that we may hold some personal data in respect of them and share this privacy notice with them or direct them to it.

It is important that the personal data we hold about you is accurate and current. **Please keep us informed if your personal data changes during your relationship with us.**

## How we use that information

As Trustee, we have a number of legal bases and purposes for processing your personal data including:

- our legitimate interest in ensuring the proper administration and management of the Plan, including (but not limited to) using personal data for the following purposes:
  - ascertaining, calculating and pay benefits to you and/or your applicable beneficiaries.
  - dealing with requests, queries or disputes, regulatory investigations and/or legal proceedings from you or third parties in respect of you.
  - managing the Plan's liabilities (including but not limited to taking steps to reduce risks affecting the security of members' benefits).
  - investing Plan assets or making investment decisions
- compliance with our legal obligations under common law, statute, regulation and/or the Plan's governing provisions.

As part of running the Plan, we may also need to hold and process sensitive information about you and your dependants and beneficiaries (known as "sensitive" or "special category" personal data). Under law, details relating to health, racial or ethnic origin, religious or other similar beliefs, sexual orientation and political affiliations are regarded as sensitive personal data. Except where the legislation allows it, this information cannot be processed or passed to a third party without your express consent.

We may hold and process sensitive personal data for the purposes of:

- administering the Plan (including, without limitation, administering death benefits and ill-health benefits and considering and making decisions in relation to the funding, investment and de-risking of the Plan)
- meeting our trust law duties and responsibilities and/or legislative and regulatory requirements affecting pension schemes

In most circumstances we will process this data as necessary for the lawful reasons of: (i) establishment, exercise or defence of legal claims to benefits; and/or (ii) in the performance of our legal obligations in connection with employment, social security and social protection. If we cannot lawfully process your special category data for the above reasons or another lawful reason, we will obtain your consent before carrying out any such processing.

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

We are committed to protecting your personal data. We take all reasonable precautions to safeguard the confidentiality of your personal data. These include procedures and security features to prevent unauthorised access of your personal data, both internally and with any data processor we engage.

## Who we share it with?

We share or may share your personal data with the following categories of recipients in connection with the processing purposes set out under "How we use that information" above:

- ConocoPhillips (U.K.) Holdings as the sponsoring employer of the Plan and other entities in the ConocoPhillips group of companies. Where this is the case, ConocoPhillips shall protect your data in line with its comprehensive global compliance framework which implements appropriate measures and safeguards to guarantee an adequate level of data protection throughout the ConocoPhillips group.
- the administrator who is responsible for the day-to-day administration of the Plan on our behalf.
- other pension schemes or insurers that receive assets in respect of members on an individual basis or as part of a bulk transfer.
- your personal advisers and other third parties that are authorised by you.
- providers of AVC investment policies.
- insurance companies, reinsurance companies and insurance brokers for the purposes of liability and risk management services.
- payroll administrators and providers for the purpose of making benefit payments and payment service providers.
  
- our banking service providers.
- the Plan's professional advisers including but not limited to the scheme actuary, auditor, and lawyers.
- any government bodies (such as HMRC), statutory bodies, public authorities, regulators (such as The Pensions Regulator) and judicial bodies.
- data cleansing, which includes tracing and existence checking to help us to maintain data quality through verifying and updating it.
- identity verification service providers to verify your identity, to protect against fraud e.g. when you first draw benefits from the Plan. Such services may include electronic checks against public records and credit bureaus that leave a "soft footprint" on your credit record. Such checks are only visible to you and do not affect your credit score.
- other third parties and the subcontractors of those parties whose services we may require from time to time including those providing pension consultancy, communication, printers, shredding and/or cybersecurity services.
- other third parties where disclosure of information is required by law, such as a spouse or their solicitor (in relation to divorce proceedings), police authority, court, the Pensions Regulator or Pensions Ombudsman, or where it is necessary for the purposes of our legitimate interests relating to the administration 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. However, given the long-term nature of pensions, we may keep your personal information for longer than this.

We retain all call recordings made to and from our administration team for a minimum period of 2 years. In limited circumstances, and where warranted by one or more of the Trustee's legitimate purposes, we may retain a call recording for longer than this.

## Your rights

Depending on why the Trustee is processing your personal data, you will have certain rights in relation to that data. The type of rights you may have include:

- **access** – you have the right to see personal data that is held about you and a right to have a copy provided to you, or someone else on your behalf, in a digital format. Your data will generally be provided to you free of charge. However, we may charge a reasonable fee in certain circumstances.
- **rectification** – you have the right to ask that we correct any personal data we hold about you that you consider to be inaccurate or wrong.
- **restrict processing** – you can require us to limit the processing of your personal data in certain circumstances, for example, while a complaint about its accuracy is being resolved.
- **object to processing** – as we are relying on legitimate interests as a reason for processing you can object to your personal data being processed, although we can override this objection in certain circumstances.
- **withdraw consent** – where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us. However, withdrawing your consent will not affect the processing of any personal data which took place before withdrawal, and it may be possible for us to continue processing your personal data where your consent is not required.
- **erasure** – you can request that your personal data is deleted altogether, although we can override this request in certain circumstances.

If you wish to exercise any of these rights, please contact us using the details set out in the next section. You should be aware that exercising some of these rights could affect the payment of your benefits, your participation in the Plan and our ability to answer questions about your benefits.

## Who to contact about your personal data

If you wish to:

- exercise any of the rights mentioned above, or
- make a complaint about how we have handled your data

please write to: ConocoPhillips Pension Plan Trustees Limited, 20<sup>th</sup> Floor, 1 Angel Court, London, EC2R 7HJ or [Contact us](#).

## Making a complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way that is inconsistent with the law, you can complain to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. You can also contact the Information Commissioner's Office on 0303 123 1113 or via a contact form at [www.ico.org.uk](http://www.ico.org.uk).

## Updates to this notice

This notice was produced on 21 November 2023. It may be updated from time to time, and you can see the latest version at any time at [www.conocophillips.co.uk/pensions-updates/](http://www.conocophillips.co.uk/pensions-updates/). Alternatively, please let us know if you would prefer to receive a hard copy (see 'Who to contact...' above).