

Looking after your data

The Trustee holds and process personal data about Plan members and beneficiaries in order to run the Plan. In doing so, we comply with relevant data protection legislation. Most of the data has been provided by members themselves, we also hold and process data provided by BMS, from other schemes, HMRC, pension dashboard providers, the DWP and regulatory bodies and from tracing organisations. The use of this data is regulated by data protection legislation, which places certain responsibilities on people who have control over the data (known as ‘data controllers’).

As a data controller, the Trustee collects and processes your personal data: (a) for the purposes of complying with its legal duties to administer the Plan; (b) for other legitimate purposes relating to the operation of the Plan; and (c) in some cases, where necessary for specific legitimate interests that are recognised in law. These recognised legitimate interests include: public task disclosure requests; national security, public security and defence; detecting, investigating and preventing crime; and/or safeguarding vulnerable individuals. We may share your personal data with certain third parties involved in running the Plan. This includes Willis Towers Watson (the Plan’s Administrator), Vidett (the Plan’s secretary), the Plan auditors, our legal, actuarial, investment and risk transfer advisers, insurance and reinsurance companies (including Rothesay Life PLC).

A copy of Rothesay PLC’s fair processing notice can be found at:

<https://www.rothesay.com/media/aaadtreu/privacy-information-oct-2020.pdf>.

In some circumstances we are joint controllers of your personal data with the Scheme Actuary, the Trustee’s legal advisers or the Trustee’s risk transfer advisers (Mercer Limited), who may process your data to comply with their professional duties as advisers to the Trustee. The Trustee may also share information with BMS and its auditors and advisers to ensure the Plan is being run in a cost-effective way and to offer certain options to members.

We also may share your personal data with the pensions dashboards ecosystem in accordance with our legal duties. This involves securely transferring your identity and pension value data to the Money and Pensions Service (MaPS) and any other authorised dashboard provider so you can view information about your pensions in one place. WTW uses an integrated service provider – Equisoft – to connect to the dashboards ecosystem.

We also hold some special categories or ‘sensitive’ data about members for the purposes of administering the Plan (for example in relation to ill-health or death benefits). We typically only do so with your explicit consent. Where you provide special categories of information about other people (e.g. your dependants), we will assume that you have the consent of that person. Where we do not have explicit consent, we will in most circumstances process this data as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation).

BMS, Willis Towers Watson and other advisers will from time to time transfer data to other countries. Where such transfers are made, the parties involved will ensure that either adequacy regulations are in place in respect of the recipient country and/or that adequate safeguards are in place to protect your personal data, including the use of Standard Contractual Clauses and/or Binding Corporate Rules. We may also rely on a legal exemption to transfer your personal data outside the EEA.

The Trustee’s policy is to retain information relating to you until your membership of the Plan ends. Once your membership ends, we may decide to delete some of the data held in relation to you after six years. However, information may be held for longer where we consider it appropriate in order to deal with any queries relating to your benefits which come up in the future.

Your rights

You have the right to access your personal data, require that we rectify any errors in the data that we hold, or request that we erase your personal data. You can also require that we restrict the way we process your personal data or object to its processing. You have a right to request a copy of your personal data, for the purposes of transmitting elsewhere (known as data portability). Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. You have the right to complain about how we process your personal data.

What if you have a complaint?

If you have any questions about the use of your data, or your rights relating to your data, you can contact the Trustee and Plan Actuary through the Plan administrator using the following contact details:

Bristol-Myers Squibb Pension Plan
PO Box 545
Redhill
Surrey
RH1 1YX

bmspensionplan@willistowerswatson.com

01737 788112

The contact details for the other relevant data controllers are:

Bristol-Myers Squibb Pharmaceuticals Limited

Uxbridge Business Park
Sanderson Road
Uxbridge
UB8 1DH

BMS Plan legal advisers:

CMS Cameron McKenna Nabarro Olswang LLP
Cannon Place
78 Cannon Street
London
EC4N 6AF

BMS Plan risk transfer advisers

Mercer Limited
1 Whitehall Quay
Leeds
LS1 4HR

Rothesay PLC

The Post Building
100 Museum St
London
WC1A 1PB

You have the right to complain to the Trustee about our processing of your personal data, if you consider that there has been a breach of UK GDPR.

The Trustee will acknowledge your complaint within 30 days and investigate the complaint in accordance with our legal obligations.

If you're not satisfied with the response to your concern or believe the processing of your information does not comply with data protection law, you can make a complaint to the UK data protection regulator (currently the Information Commissioner's Office) in writing:

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

or through its website: **ico.org.uk**, or by phone on: **0303 123 1113**.

June 2026