

## Privacy statement Stichting Pensioenfonds Avery Dennison

Stichting Pensioenfonds Avery Dennison processes your personal data with great care. When processing your personal data, we comply with privacy legislation. In this privacy statement, we outline which personal data we process as a data controller and how we handle your personal data.

### What is personal data?

Personal data is any information that can be used to identify someone.

### From whom do we process personal data?

We process the personal data of the following individuals:

- anyone whom we manage pensions for, i.e., anyone who accrues or has accrued a pension with Avery Dennison and anyone who is retired or for whom we provide a survivor's or orphan's pension
- anyone who visits our website
- anyone with whom we have contact with (e.g., service providers, family members, authorised personnel)

### Active participants, sleepers and pension beneficiaries

*(1) Which personal data do we process?*

The following personal data is processed by the Pension Fund:

- Personal details (such as name, date of birth, sex, nationality)
- Contact information (such as bank account, social security and telephone number, postal or e-mail address)
- Government documentation (such as passport (number), identity card (number))
- For foreign employees, also a birth certificate and marriage certificate
- Salary and employment details (such as pensionable salary, start/end of employment, duration of employment, part-time factor)
- Pension data (such as pension entitlement level, any (former) partner or children in relation to survivor's pension, participant number, policy number, authorised representative, marital status)
- Health data (disability and benefit rate)
- Participant portal interaction data (IP address, cookie identifications, operating system, see also our cookie statement)
- Data for calculating pension scenarios (such as living situation, vehicle, life course)

As a general rule, Special Categories of Personal Data – such as health data – cannot be processed unless an exception is applicable. The disability percentage (AO percentage) constitutes as personal data about a participant's health situation. We are entitled to process the AO percentage and benefit percentage, as this is needed for the proper administration of pension schemes.

As outlined in this privacy statement, we only process the data that is necessary to fulfil our objectives.

*(2) Why do we process your personal data (legal basis and objective)?*

We process your personal data in order to fulfil our (legal) obligation to properly manage your pension.

In order to provide effective services, we process your personal data, for example, for the following purposes:

- Carefully and accurately calculating the level of pension entitlements
- Calculating and collecting premiums
- Informing members correctly and in a timely manner
- Processing the correct payment of your pension benefits
- Reporting
- Responding to questions

In relation to the calculation of pension scenarios, we process personal data subject to authorisation.

*(3) From whom do we receive personal data?*

We receive the personal data we need from, amongst others:

- You or your legal representative
- Your employer
- Personal Records Database (*Basisregistratie Personen*)
- Employment Insurance Agency (*Uitvoeringsinstituut Werknemersverzekeringen*)
- Judicial officers and other entitled bodies
- Central Administration Office (*Centraal Administratie Kantoor, CAK*)
- Previous pension providers

*(4) To whom do we provide your personal data to?*

The Pension Fund may provide (some) personal data to the following parties if this is necessary for the fulfilment of the aforementioned objectives:

- Stichting Pensioenregister ([Mijnpensioenoverzicht.nl](http://Mijnpensioenoverzicht.nl))
- Tax Authority, CAK, Central Bureau of Statistics
- Social Insurance Bank (*Sociale Verzekeringsbank Uitvoeringsinstituut*), Employment Insurance Agency
- Insurers, the external auditor, the external actuary, the bank
- Administrators and municipalities
- Judicial officers and other entitled bodies
- Achmea Pension Services
- Third parties that provide services to us, such as communication services and the related distribution thereof.

In the event of cooperation with external parties, which involves the exchange of personal data, the Pension Fund establishes agreements on the requirements to be fulfilled with respect to the data exchange.

In all other instances, personal data will not be provided by the Pension Fund to third parties unless there is a legal obligation or the Pension Fund has received your written consent to do so.

### **Website visitors and other parties**

#### *(1) What personal data do we process?*

The Pension Fund processes the following personal data:

- Personal details (such as name and date of birth)
- Contact information (such as telephone number, address or e-mail address)
- Interaction data (IP address, cookie identifications, operating system, see also our cookie statement)

#### *(2) Why do we process your personal data (legal basis and objective)?*

In order to provide effective services, we process your personal data for the following purposes on the basis of our legitimate interest:

- Responding to questions from parties other than participants
- Maintaining our cooperation with third parties
- Operating our website

#### *(3) From whom do we receive personal data?*

We receive the aforementioned personal data from you.

#### *(4) To whom do we provide your personal data to?*

The Pension Fund may provide personal data to:

- Third parties that provide services to us, such as administration and website hosting.

In the event of cooperation with external parties, which involves the exchange of personal data, the Pension Fund establishes agreements on the requirements to be fulfilled with respect to the data exchange.

### **What rights do you have in relation to your personal data?**

You have the right to ask the Pension Fund what data has been collected about you. You will then receive an overview of this data. Do you notice incorrect data? Or is information missing? Then, you have the right to ask for a correction or addition. Furthermore, you can request that the Pension Fund delete your data if you believe that the data is (still) incorrectly included in the administration. You can refuse to have (some of) your personal data processed. You can also ask the Pension Fund to transfer your personal data. The Pension Fund will inform you within four weeks of receiving such a request as to whether it has complied with the request, stating the reasons for any (partial) rejection. You can find the contact details at the bottom of this privacy statement under

**Contact.**

### **Retention of your personal data**

Your personal data will not be retained for any period longer than is necessary for the purpose for which it was collected or for which it is processed. We may retain some data for a longer period of time if legally required or if, for example, your partner and/or children receive a survivor's pension from us.

### **Protection of personal data**

The Pension Fund protects personal data appropriately against theft, loss or other unlawful use. All necessary measures are in place to prevent personal data from being lost, stolen or accessed by persons outside of the Pension Fund.

For example, we have established agreements with Achmea Pension Services regarding the protection of your personal data. This is because Achmea Pension Services processes your personal data on behalf of the Pension Fund. We also have an agreement on how Achmea Pension Service should perform its activities for our Pension Fund. These agreements are outlined in a contract.

### **We use cookies on our website**

A cookie is a file on your computer that remembers your activity on our website. We use these cookies, for example, to operate and improve the functioning of our website. You can read more about this in our [cookie statement](#).

### **You can file a complaint if you disagree with us**

You have the right to file a complaint regarding the processing of your personal data with us or directly with the Data Protection Authority (*Autoriteit Persoonsgegevens*). To do so, please visit [autoriteitpersoonsgegevens.nl](http://autoriteitpersoonsgegevens.nl).

### **Changes to this privacy statement**

We may amend this privacy statement. Therefore, we advise you to check this page periodically. This privacy statement was last updated on 11 July 2022.

### **Contact**

We are happy to help. Please contact us:

- if you have questions about this privacy statement
- if you have questions about how we process your personal data
- if you wish to exercise your rights in relation to your personal data

You can contact us via e-mail at [pensioenfondsaveverydennison@achmea.nl](mailto:pensioenfondsaveverydennison@achmea.nl) or via telephone at 013-4621232.

Mailing address: Postbus 90170, 5000 LM Tilburg

You can also contact our Privacy Officer, Ms Marion van der Zwaan via e-mail at [marion.van.der.zwaan@eu.averydennison.com](mailto:marion.van.der.zwaan@eu.averydennison.com).