

## **Privacy and Cookies Notice for the Phillips 66 UK Pension Plan Website**

### **1. Who are we**

- 1.1 We are Buck Consultants (Administration & Investment) Limited, a limited liability company registered in England and Wales under number 01034719 with its registered office at 160 Queen Victoria Street, London, EC4V 4AN ("Buck Consultants", "our", "us" or "we"). In this Privacy and Cookies Notice, references to "our Group" are to the group of companies of which Buck Consultants is a member.
- 1.2 For the purpose of UK data protection legislation, we are the data controller of any personal information collected from you in connection with your visit to this website. We are registered with the Information Commissioner's Office under registration number Z6047827.
- 1.3 We are providing this website on behalf of the Trustees of the Phillips 66 UK Pension Plan ("Trustees").

### **2. This Privacy and Cookies Notice**

- 2.1 This Privacy and Cookies Notice explains:
  - 2.1.1 how we collect, use and store information about your visits to this website and about your computer, tablet, mobile or other device through which you access this website;
  - 2.1.2 how we collect, use and store any personal information you provide to us if you contact us in connection with this website or Privacy and Cookies Notice; and
  - 2.1.3 the cookies that this website uses.
- 2.2 By accessing and using this website, you signify your agreement to this Privacy and Cookies Notice. If you do not agree with this Privacy and Cookies Notice, please do not use this website.
- 2.3 Questions, comments and requests regarding this Privacy and Cookies Notice (including requests to exercise any of your rights described in this Privacy and Cookies Notice) are welcomed and should be addressed to the Compliance Officer at Buck Consultants, 160 Queen Victoria Street, London EC4V 4AN or by email to [HRS-UKCompliance@buck.com](mailto:HRS-UKCompliance@buck.com).

### **3. The information that we collect from or about you**

- 3.1 On this website we may collect:
  - 3.1.1 information about your visits to this website and about your computer, tablet, mobile or other device through which you access this website. This may include the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location, the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), pages you viewed and searched for, page response times, download errors, and length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), and website navigation and search terms used; and
  - 3.1.2 any personal information you provide to us if you contact us in connection with this website or this Privacy and Cookies Notice.

### **4. Where we store your personal data**

- 4.1 The data that we collect from or about you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating

outside the EEA who work for us or for one of our or our Group member's suppliers or subcontractors (for example, the third party supplier which hosts this website on our behalf).

- 4.2 Where personal data is transferred to and stored in a country not determined by the European Commission as providing adequate levels of protection for personal data, we take steps to provide appropriate safeguards to protect your personal data, including entering into standard contractual clauses approved by the European Commission, obliging recipients to protect your personal data. If you would like further information on the specific mechanism used by us when transferring your personal data outside of the EEA, please contact us using the details set out at the end of this Privacy and Cookies Notice.

## **5. Uses made of your personal information**

- 5.1 We use your personal information to provide this website to you and other website users, in accordance with the website's Terms of Use. We also use your information:

5.1.1 to ensure that content from this website is presented in the most effective manner for you and for your computer;

5.1.2 to help us improve our products and services and for quality control, security, internal record keeping and other business needs; and

5.1.3 to administer this website to create statistical data.

Our legal basis for processing your personal information in this way is that it is necessary for our legitimate interests of: (a) assisting the Trustees to comply with their legal obligations (b) keeping this website updated and relevant (c) running our business, (d) providing administration and IT services, (e) network security, and preventing fraud and (f) in the context of a business reorganisation or group restructuring exercise

## **6. Disclosure of your personal information**

- 6.1 We may disclose your personal information to:

6.1.1 the Trustees;

6.1.2 any member of our Group;

6.1.3 suppliers we or our Group engage to process data or provide services to us;

6.1.4 any business partner of our Group; and/or

6.1.5 auditors or contractors or other advisers auditing any of our business processes,

in accordance with the purposes for which the data was originally collected or to which you have subsequently consented.

- 6.2 We may also disclose your personal information to third parties:

6.2.1 in the event that we sell or buy any business or assets, in which case we may disclose your information and personal data to the prospective seller or buyer of such business or assets provided that such disclosure will be conditioned on the basis that any use of your personal data will be in accordance with this Privacy and Cookies Notice;

6.2.2 if we or substantially all of our assets are acquired by a third party, in which case information and personal data held by us about our customers will be one of the transferred assets provided that disclosure of your personal data will be conditioned on the basis that any use of such data will be in accordance with this Privacy and Cookies Notice; and/or

6.2.3 if we are under a duty to disclose or share your information and personal data in order to comply with any legal or regulatory obligation, or in order to enforce or

apply this website's Terms of Use or our separate terms and conditions of supply or other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction or law enforcement or the administration of justice. We may disclose your information and personal data to government institutions or authorities if required by law or when requested to by regulatory bodies or law enforcement organisations.

## **7. How long do we keep your information?**

- 7.1 Personal information received by us will only be retained for as long as necessary to fulfil the purposes described in this Privacy and Cookies Notice or for the maximum period of time as required by law, after which time it will be destroyed in a secure manner.

## **8. Cookies**

- 8.1 A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your "device") from our website and is stored on your device's browser or hard drive.

- 8.2 The cookies we use on our website won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

- 8.3 By continuing to browse the website, you are agreeing to our use of cookies.

- 8.4 If you don't want us to use cookies when you use our website, you can set your internet browser not to accept cookies. However, if you block cookies some of the features on the website may not function as a result.

- 8.5 You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org). This website will also explain how you can delete cookies which are already stored on your device.

- 8.6 We only use "Google Analytics" on this website. This cookie provides us with a visitor count and an understanding of how visitors move around and use the website. We can then use this information to improve navigability and the website generally.

- 8.7 All cookies will expire after 12 months.

## **9. Your rights**

- 9.1 You have the right to access the information which we hold about you ("data subject access request").

- 9.2 You have the right to receive your personal information in a structured and commonly used format so that it can be transferred to another data controller ("data portability").

- 9.3 We want to make sure that your personal information is accurate and up to date. You may request at any time that we correct or remove any information we hold about you which you think is inaccurate. Please keep us informed if your personal information changes during your relationship with us.

- 9.4 You have the right to object at any time to our processing of your personal information for direct marketing purposes.

- 9.5 You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

9.6 In certain circumstances you have the right to:

9.6.1 request the erasure of your personal information erasure ("right to be forgotten");

9.6.2 restrict the processing of your personal information to processing in certain circumstances.

The above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under applicable laws apply.

9.7 There is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

## **10. Complaints**

10.1 If you have concerns about our use of your personal data, please send an email with the details of your complaint to [HRS-UKCompliance@buck.com](mailto:HRS-UKCompliance@buck.com). You also have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/>).

## **11. Changes to our Privacy and Cookies Notice**

11.1 We reserve the right to amend or modify this Privacy and Cookies Notice at any time. If you do not agree to these changes, please do not continue to use this website.

This Privacy and Cookies Notice was last updated on 17 April 2019.