

PERSTORP PENSION PLAN



Privacy Notice

Personal information and what we do with it

The Trustees of the Plan need personal information about you to run the Plan and pay benefits. Similarly, other parties involved in running the Plan will sometimes need to make decisions jointly with the Trustees about how your personal information will be used for those purposes. These other parties (our 'Trustee Adviser') include the Plan Actuary (currently Andrew Mandley of Willis Towers Watson).

In legal terms, the Trustees and the Trustee Adviser are 'joint controllers' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what the Trustees do with your personal information, and also what the Trustee Adviser does with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, 'we' means both the Trustees and the Trustee Adviser where they are acting as joint controllers in relation to your personal information (as described above).

What personal information we have

We normally hold some or all of the following types of personal information:

- Your name, date of birth, national insurance number and bank account information (where benefits are in payment).
- Your sex/gender (we use this to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. 'Mr., Mrs., Ms.')
- Contact details (including your address, phone number and email address).
- If your benefits from the Plan derive from your employment, details of your employer when you were building up benefits in the Plan, how long you worked for them and your salary from time to time.
- Whether you are married or in a civil partnership and other information we might need to pay any benefits due on your death.
- Any information you have provided about who you would like to receive any benefits due on your death.
- If your benefits from the Plan form part of a divorce settlement, details of that settlement.
- Details of any contributions paid by you or on your behalf to the Plan, including additional voluntary contributions (AVCs.)
- Details of any benefits earned in a previous pension arrangement, if you have transferred these into the Plan.
- Correspondence that we may have received about you from your appointed independent financial adviser.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Plan, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Plan benefits.

We also have a legal obligation to carry out due diligence checks in the event of a pension transfer request, which may mean that we are obliged to ask you for additional information. For instance:

- If you wish to transfer to an occupational pension scheme, we have to request evidence that demonstrates an "employment link". This could include a letter from your employer confirming your employment, a schedule of contributions, payslips and bank statements (the bank account detail on your payslip might be different from the bank details we hold for you).
- If you request a transfer to an overseas pension scheme, we are legally obliged to check that you are resident in the same country as that scheme. This evidence might include utility bills, TV subscriptions, insurance documents relating to your overseas home, address, bank account and credit card statements, evidence of local tax being paid and registration of address with local doctors.

Where we get personal information from

Some of the information the Trustees have comes directly from you. In addition, Formica Limited, who administers the Plan on behalf of the Trustees, may have obtained information from you and passed it to the Trustees. The Trustees may then in turn pass information about you to the Trustee Adviser or may instruct the administrator to do so. The Trustees are the source of the personal information which the Trustee Adviser has about you.

Sometimes the Trustees get information from other sources: for example, from your Plan employer (for information such as your salary and length of service); from another plan if you have transferred benefits from that plan; from government departments such as HMRC and DWP; and from publicly accessible sources (e.g. the electoral roll) if the Trustees have lost touch with you and are trying to find you. The Trustees may in turn pass this to the Trustee Adviser (as above).

If the Trustees ask you for other information in the future (for example, about your health), they will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Why we hold personal information and how we share it

The Trustees must by law provide benefits in accordance with the Plan's governing documentation and must also meet other legal requirements in relation to the running of the Plan.

The Trustees will use your personal information to comply with these legal obligations, to establish and defend their legal rights, and to prevent and detect crimes such as fraud. The Trustees may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

The Trustees also have a legitimate interest in properly administering the Plan. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of Plan governance are met (including standards set out in Pensions Regulator guidance). The Trustees make sure that your own interests are not outweighed or prejudiced by their legitimate interests.

In order to achieve this, the Trustees may share your personal information with various people as necessary, including: any new trustees; the Plan employers; the Plan administrator; the Trustee Adviser (if relevant); the Trustees' other professional advisers; auditors; insurers; HMRC; the Pensions Ombudsman; the Pensions Regulator; the Information Commissioner; and IT and data storage providers and other service providers, such as tracking and tracing services. If your benefits are transferred to another plan, the Trustees will also need to provide the administrators of that plan with information about you.

When the Trustees need to use information about your health, they may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustees to use information about your health (or other very personal information, such as details about personal relationships relevant to who should receive benefits on your death) without consent, and they will do so where that is necessary to run the Plan in a sensible way. You can withdraw your consent at any time by contacting the Trustees using the contact details given below. This may affect what the Trustees can do for you, unless they have another lawful reason for using your information. For example, if you apply for ill health early retirement and consent to the Trustees processing your health data for that, but then you withdraw that consent, the Trustees will usually be unable to consider your application. If you withdraw consent after the Trustee's processing, this will not retrospectively affect the processing that has already happened.

Sometimes the Trustees need to use your personal data, including special categories of personal data, in order to establish, exercise or defend legal claims.

The Trustees may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Plan.

The Plan's employers may also have a legitimate interest in contacting you about your benefits under the Plan, and any additional options which may be available to you in relation to those benefits. In such circumstances, the Trustees may share your personal information with the employers so that they can contact you for that purpose.

The Trustees may need to share personal data with insurers in relation to the purchase and pricing of insurance contracts called 'annuities'. Insurers will use that data to verify the assets and liabilities of the Plan.

The Trustees will share your personal data when we purchase the annuity and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). The Trustees will write to members to explain about the particular annuity and who the insurer is. In this way you can know who holds your personal data and how to exercise your rights against them. The following categories of personal data would typically be shared with insurers: Plan membership ID number; marital status and details about spouse/partner; date of birth; information about annual pensions increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

Plan Actuary

The Plan Actuary is appointed by the Trustees to value the Plan benefits and carry out other calculations in relation to your Plan benefits. He will use your personal information for this purpose and has a legitimate interest in doing so. The Plan Actuary will also use your personal information to comply with his own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. He may also share it with his own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustees and the Plan Actuary for statistical research, but only in a form that no longer identifies you. In some circumstances the Plan Actuary may also be able to fulfil the purpose mentioned above using information which the Trustees have anonymised before sharing with him.

You can see more about what the Plan Actuary does with your data at www.wtwco.com/en-GB/Notices/how-willis-towers-watson-uses-personal-data-for-actuarial-services-to-uk-pension-scheme-trustees.

How to contact the other people we give your personal information to

Some of the people mentioned above just use your personal information in the way we tell them. However, others (including the Trustee Adviser) may make their own decisions about the way they use this information to provide their services, perform their functions, or comply with their regulatory requirements. In such a case, they have responsibilities as controllers in their own right. This means that they are subject to the same legal obligations as us in relation to your information, and the rights you have in relation to your information apply to them, too.

If you want any more information from the Trustee Adviser or from any other people who receive your personal information from us, or to exercise any rights in relation to the information they hold, please contact the Trustees and they will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Plan and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of 15 years from the end of the Plan year in which the last payment from the Plan is made to or in respect of you.

However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries from you or your beneficiaries or other persons who might ask us if they are entitled to payments, complaints (from you or them), and our legal obligations mentioned above.

The Trustee Adviser will retain personal information for as long as they provide services to the Trustees. When they have ceased providing services, it will retain personal information for a period of time that reasonably allows it to comply with its regulatory and legal obligations.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

To exercise these rights, please use the Plan administrator's contact details, which are set out below. The Plan administrator can also supply more information about these rights to you, on request.

The Trustees have agreed with the Trustee Adviser that the Trustees will be responsible for dealing with requests from you in respect of your rights if those requests relate to the joint use of your personal information described in this notice. This means if you wish to exercise rights against the Trustees and the Trustee Adviser for what they do jointly with your personal information, you should contact the Trustees (via the Plan administrator) using the details below.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, the Trustees can be contacted via the Plan administrator at: Formica Limited, Coast Road, North Shields NE29 8RE, telephone 0191 622 0106 option 2, or email formica.pensions@formica.com.

The Plan administrator can be contacted at: Joanne McGregor, Formica Limited, Coast Road North Shields, NE29 8RE, telephone 0191 259 3150 or 07827 893 447, email jo.mcgregor@formica.com.

If you have concerns about the way we handle your personal information, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.

16 December 2022