

Lafarge UK Pension Plan (*the Plan*)

Privacy Notice

The purpose of this notice is to help you understand how we collect and use your personal information, and what your rights are in respect of that information.

Who we are

We Lafarge UK Pension Trustees Ltd (*we or the Trustee*), as the Trustee of the Plan, hold certain personal information (known as “personal data”) about scheme members and, where applicable, their dependants and beneficiaries. Most of the personal data held and processed by the Trustee in running the Plan will be personal data (in other words, it is information from which you as an individual can be identified). Personal data is subject to certain protections.

The Trustee is the “data controller”, as we decide the purposes for and the means by which the personal data we hold is processed.

What information do we collect about you?

Depending on the circumstances and the stage of your membership, we may hold some or all of the following information about you:

- your name and date of birth;
- your gender and marital status;
- your postal address, email address, telephone or mobile number;
- your National Insurance number;
- information about your benefits under the Plan, including pensions and death benefits.
- Relevant employment information, such as current and past salary information, pensionable pay, employment dates, and career history (where relevant);
- details of your bank account to pay pension or lump sum benefits;
- details about your dependants and/or beneficiaries so that we can pay benefits following your death;
- information about your physical or mental health (where it is required for the purposes of the Plan);
- Identify Verification documentation, e.g. passport details, birth, marriage and death certificates.

How do we gather your personal information?

Your personal information will generally be collected directly from you or from your employer. However, we may also receive personal data from other parties such as HM Revenue & Customs, the Pensions Ombudsman, from public databases or someone acting on your behalf, such as an independent financial adviser.

We may use a tracing organisation or online identity verification tool to verify your identity or the identity of any potential beneficiaries or trace contact details if these are out of date and we need to get in touch. Please note that, although any such identity verification may then appear on a credit record, it will only be as an electronic ‘soft footprint’. This means that it will not in any way affect your or your potential beneficiaries’ credit rating.

If you are receiving a dependant’s benefit from the Plan, or a benefit resulting from divorce or the dissolution of a civil partnership, we may have been given your personal information by the member or through enquiries undertaken by us on a member’s death.

How do we use that information?

The Trustee has a legitimate interest in holding and processing information about you as it is needed for

us to properly administer the Plan and to calculate and pay benefits. We also keep the above information in order to allow us to comply with our obligations towards members under the Plan's governing documents, as well as under relevant legislation. We will not collect any personal data from you that we do not need.

Personal data relating to the Plan is held on paper and on computer systems. As the "data controller", the Trustee must process this information fairly and lawfully.

As part of running the Plan, we may also need to hold and process particularly sensitive information about you and/or your dependants and beneficiaries. This is known as "special categories of personal data" and it includes information that relates to health. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent.

Who do we share it with?

We are not allowed to share personal data about you with other organisations and people, unless the law allows us to or you have given your consent. As we need to share information with others in order to properly administer the Plan and provide you with benefits, there is a legitimate interest in the Trustee sharing this information. We may also need to share it in order to meet contractual and other legal obligations.

We share personal data with the following:

- the third parties who are responsible for the day-to-day administration of the Plan on behalf of the Trustee and their properly appointed service providers (such as banking providers if benefits are being paid overseas);
- your current, past or future employer (i.e. the company that employs or employed you while you were a member) and other companies in the group;
- the Plan's professional advisers, including the Plan actuary, auditor, medical advisers, investment advisers and lawyers;
- HM Revenue & Customs and other statutory bodies (such as the Pensions Ombudsman and the Pensions Regulator) or other third parties as required by law – the Trustee can be fined and subject to other action if it fails to provide certain information to these authorities;
- the advisers and printers who help us prepare various communications we send to you;
- providers of secure archiving services who help us to store historic data relating to the Plan and its members;
- tracing agencies who assist the Trustee with updating scheme data from time to time;
- Aon plc ("Aon") appointed by the sponsors of the Plan, to assist the sponsors in complying with their legal responsibilities in relation to their sponsorship of the Plan and other providers who assist the sponsors with their reviews of its pension offering from time to time;
- our appointed insurance companies for the purposes of providing additional voluntary contributions;
- insurers or re-insurers providing services to secure benefits or de-risking mechanisms in accordance with the Plan rules;
- third parties who will help the Trustee to comply with their duty to carry out anti-money laundering checks;
- with your consent, independent financial advisers, such as Origen, who provide advice to individual members of the Plan on options that may be made available by the Trustee or sponsors from time to time.

Any such disclosure of your personal information will usually be to third parties in the UK or the European Economic Area (the EEA). However, in connection with the purposes set out above, we may from time to time need to transfer your personal data outside the UK or the EEA (for example to a service provider, or to companies within the corporate group of the principal employer of the Plan). Such transfers shall be carried out in accordance with applicable data protection law including, where necessary, the use of appropriate transfer mechanisms to ensure that third parties provide an adequate level of protection for your personal information.

How long do 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. But, given the nature of pension schemes, the Trustee may be required to keep some of your personal information for the rest of your life, and beyond, so that we have the information we need in order to pay benefits and to answer queries relating to your benefits.

We review the personal data held in relation to the Plan on a regular basis in accordance with our data protection policy. If we conclude that certain personal data is no longer needed, that personal data will be destroyed.

Lane Clark & Peacock (LCP) – The Plan Actuary

LCP, in providing actuarial services to the Plan, is also a Data Controller. This is because, in relation to those actuarial services, the Plan Actuary decides on their own account what Plan Personal Data is passed to it and why, as well as what it is used for / is acting alongside the Trustee in making decisions about what Plan Personal Data is collected and why, and what it is used for.

The link that follows provides sight of LCP's Privacy Notice available at:

<https://www.lcp.com/third-party-privacy-notice>

Your rights

- You have the right to request information about the processing of your personal data, 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 machine readable (namely, digital) format;
- If at any point you believe that the personal data we hold about you is inaccurate or wrong, you can ask to have it corrected;
- You can require the Trustee to restrict/limit the processing of your personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved;
- As we are relying on legitimate interests as a reason for processing, you can object to your personal data being processed, although the Trustee can override this objection in certain circumstances;
- Where you have given us your consent to processing your personal data, you can withdraw that consent at any time by notifying us (see "Who to contact" below). However, withdrawing your consent will not affect the processing of any personal data which took place beforehand and it may be possible for the Trustee to continue processing your personal data where this is justified;
- You can request that your personal data is deleted altogether, although the Trustee can override this request in certain circumstances.
- You have the right to complain to the Information Commissioner's Office or to bring an action before the court, if your personal data rights are not complied with (see further below).

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Plan and our ability to answer questions relating to your benefits.

Information will generally be provided to you free of charge, although the Trustee can charge a reasonable fee in certain circumstances.

Who to contact about your personal data

If you wish to:

- see your personal data or to exercise any of the rights mentioned above;
- request a hard copy of this notice; or
- make a complaint about how we have handled your personal data

please contact;

The Trustee Secretary, Lafarge UK Pension Trustees Limited, c/o Muse Advisory, KD Tower, Suite 10, The Cotterells, Hemel Hempstead, HP1 1FW

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 which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: **0303 123 1113**.

Updates to this notice

This notice is the latest version as at 29 May 2024. This notice will be updated from time to time and you can see the current version at any time on the Trustee's website at <https://www.isio.com/scheme-documents/the-lafarge-uk-pension-plan/>. Alternatively if you would prefer to receive a hard copy of this notice, please let us know (see "Who to contact" above).