

PRIVACY NOTICE FOR THE J BARBOUR & SONS LIMITED 2015 PENSION SCHEME  
("the Scheme")

The Trustees of the Scheme hold and process personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

What we do with your data

As data controllers, the Trustees collect and process your personal data for the purposes of complying with their legal duties to administer the Scheme, and for other legitimate purposes relating to the operation of the Scheme. This includes processing to calculate benefits, to assess Scheme funding and to help us to make decisions related to the Scheme's investments and risks.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by J Barbour & Sons Ltd ("the Company"), J Barbour & Sons (Manufacturing) Limited, other schemes from which members have transferred, HMRC, the Department for Work and Pensions (DWP), regulatory bodies and tracing organisations. We also share information with other organisations, and have included more information on this below.

We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so may affect our ability to properly pay the benefits due under the Scheme.

The data we hold includes (but is not limited to) your name, address, salary, dates of service with the Scheme and employment with the Company, date of birth, NI number and contact details.

We also hold some special categories of, or "sensitive", data about members for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will typically only hold these types of data in cases where it has been provided by you for the purpose of administering your benefits in the Scheme. Where we are relying on your consent to allow us to process your sensitive data, you can withdraw it at any time. Where it is not possible or practical to get consent (for example in serious ill health cases) then we will only hold your personal data where it is necessary for us to do so in order to properly preform our duties as Trustees.

Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, Isio Group Limited (the Scheme Administrator and advisors to the Trustees), Joseph Jackson of Isio Group Limited (the Scheme Actuary), DLA Piper UK LLP (the Scheme's lawyer), and Cowgill Holloway LLP (the Scheme's Auditor). From time-to-time, it may also be necessary for us to share your personal data with other third parties involved in running the Scheme. These third parties may change over time.

In some circumstances we are joint 'data controllers' with the Scheme Actuary, the Scheme's lawyer and the Scheme's auditor (who may process your data to comply with their professional duties as part of their roles) and the Company. The Company does not hold your full Scheme membership record, however the Company does hold some of your data, for example within its historic 'human resources' records. The Company holds this data in order to comply with its legal obligations as the sponsoring employer of the Scheme. It has a legitimate interest in the Scheme being run in an accurate and cost effective way and may have an interest in offering certain options to members. The Trustees may share information with the Company and its auditors and advisers for this purpose.

The Company, the Scheme Administrator, and the Scheme's other advisers may from time to time transfer data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place.

#### Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you after your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information may be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Isio Group Limited will hold on to your personal data for 75 years after the termination of the contract with us. This is to protect themselves against any subsequent legal claims."

#### Your rights

You have the right to access your personal data, require us to rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances, you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. You can do this by contacting the Scheme Administrator using the contact details below. If you do this, please be aware that if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

#### Contact details

If you have any questions about this please send your request to the Scheme Administrator, who will be able to pass your request on to the data controllers listed above. To do this, please use the following contact details:

The Administrators of the J Barbour & Sons Limited 2015 Pension Scheme, Isio Group Limited, by telephone on 0333 014 5473, by email to [jbarbour&sons@isio.com](mailto:jbarbour&sons@isio.com) or by writing to J Barbour & Sons Limited 2015 Pension Scheme, Isio Group, PO Box 163, Blyth, NE24 9GS

Please refer clearly to the J Barbour & Sons Limited 2015 Pension Scheme in your request.

#### What if you have a complaint?

To make a complaint about how we have handled your information, please contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745