

The P & B Metal Components Limited Section of the Pensions Master Plan¹ (“the Scheme”)

Privacy Notice from the Scheme Trustee

The Trustee needs personal information about you in order to run the Scheme and pay benefits.

In legal terms the Trustee is the ‘data controller’ and is required to tell you some things about the personal information it has about you, how it is used and what your rights are in relation to it.

In this Privacy Notice, when we refer to the “employer” we are referring to P & B Metal Components Limited or the company you worked for at the time you were accruing benefits in the Scheme and its predecessor (including whilst your benefits in the Scheme or its predecessor are or were linked to your pay during employment).

Collection of your information

The Trustee collects and processes the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone numbers, email addresses, marital status, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;
- records of the Trustee’s communications with you, including any complaints; and
- in some cases, special categories of personal data such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

Where applicable, information is also collected about your nominated beneficiaries, dependants or next of kin. Before providing the Trustee with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, the above information may also be collected from other sources:

- Your employer;
- the third party administrator for the Scheme (currently Isio Pensions Limited);
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP;
- Publicly accessible sources (e.g. the electoral roll) if the Trustee has lost touch with you and is trying to find you.

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

¹ Currently in the process of being re-named from the P & B Metal Components Limited Section of the Deloitte Pensions Master Plan

How the Trustee uses your information

Your information is used for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;
- b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations and calculations; for reviews the Trustee or its administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing should the Trustee happen to lose contact with you) or to prevent fraud;
- c) for meeting on-going regulatory, legal and compliance obligations, and investigating or preventing crime;
- d) to improve its processes and use of technology, including testing and upgrading of systems, and to learn about other processes which can be used to improve the administration of the Scheme; and
- e) when the Trustee undertakes or agrees to activities from time to time to help it manage the liabilities of the Scheme, such as longevity modelling and hedging, insurance, bulk transfers, pension increase exchanges and transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

The Trustee's use of your information as described above is permitted by applicable data protection law because it is:

- (i) required to meet our legal or regulatory responsibilities, including when the Trustee makes the disclosures to authorities, regulators or government bodies referred to below;
- (ii) necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain;
- (iii) in limited circumstances, processed with your consent which the Trustee obtains from you from time to time, such as when you ask the Trustee to make disclosures or direct it on benefit payments or where the Scheme Rules require you to provide information which cannot otherwise be processed without your consent;
- (iv) necessary for the Trustee's legitimate interests: in pursuing the purposes set out in (a) to (e) above; in establishing, exercising or defending legal claims; and (when the Trustee makes the disclosures to your employer for the audit and corporate transaction purposes referred to below) necessary for their legitimate interests, such interests in each case not being overridden by your privacy interests; and
- (v) necessary for your legitimate interests in having your benefits administered correctly.

Where the personal data we collect from you is needed to meet its legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if the Trustee cannot collect this personal data it may be unable to record, calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

The Trustee may share your information with the following recipients:

- its suppliers, including your employer and other providers of services to it, such as administrators, Banks and Deposit takers, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Scheme actuary (for actuarial
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calculations), and printing, communication, IT and hosting, marketing, and tracing providers (and when information is shared with these recipients the Trustee takes steps to ensure they meet its data security standards, so that your personal data remains secure);

- your employer for audit purposes or in relation to corporate transactions initiated by them;
- insurance and reinsurance companies, such as when the Trustee carries out the activities referred to in (e) above;
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- others persons from time to time when the disclosure is needed to exercise or protect legal rights, including the Trustee's own and those of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

Isio Pensions Limited, who provide actuarial and administration services to the Scheme, maintains its own privacy notice, which can be viewed here:

<https://www.isio.com/privacy>

Crowe UK LLP, the Scheme Auditor, maintains its own privacy notice, which can be viewed here:

www.crowe.com/uk/privacy-policy

Gunnercooke LLP, who provide legal advice to the Scheme, maintains its own privacy notice, which can be viewed here:

<https://gunnercooke.com/privacy-policy/>

Transfers of your information abroad

The Trustee may transfer, store or process the personal information it collects about you to or in a country outside the European Economic Area ("EEA").

Where there is an adequacy decision by the European Commission in respect of that country this means that the country to which data is transferred is deemed to provide an adequate level of protection for any personal information held.

Where there is not an adequacy decision by the European Commission in respect of that country the Trustee will endeavour to ensure that information is treated securely and in accordance with this Privacy Notice and the EU and UK laws on data protection.

Retention of your information

The Trustee will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To do this, the Trustee will keep your information for the longer of the period required in order to meet its legal or regulatory responsibilities, and the period envisaged within its retention management policy documentation. The Trustee determines the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests.

Please note, the Scheme's Independent Trustee (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the

Scheme. Information about PAN's approach in this situation to data security as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>

Your rights

You have rights under data protection law of access to and rectification or erasure of your personal data and to restrict its processing, and (in some circumstances) to require certain of your information to be transferred to you or a third party.

You also have rights under data protection law to object to the processing of your information on grounds which the Trustee has said are necessary for its legitimate interests (see above), or for marketing purposes (see above).

If you have any questions or wish to exercise any of the above rights, you can contact the Trustee as detailed below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent.

You can also lodge a complaint about the Trustee's processing of your personal information with the office of the Information Commissioner (www.ico.org.uk).

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. The Trustee will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was updated in September 2023. It is non-contractual. The Trustee reserves the right to amend it from time to time but will notify you where it does this.

Issued on behalf of

PAN Trustees UK LLP, the Trustee of the P & B Metal Components Limited Section of the Pensions Master Plan

Contact details:

The Trustee of the P & B Metal Components Limited Section of the Pensions Master Plan
c/o Isio
PO Box 4916
Interface Business Park
SN4 4RX

e-mail contact: PandBmetal@isio.com

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