EVERSHEDS SUTHERLAND

The Pensions Master Plan

Master Plan Trustees Ltd

Personal information and what we do with it

The Pensions Master Plan is a defined benefit master trust pension scheme for non-associated employers. Each Section of the Master Plan has its own Section Rules and its own Section Trustees. Master Plan Trustees Ltd (the "**Trustee**") is the trustee of the Master Plan as a whole. For most purposes, personal information is held at Section level and not by the Trustee. The Section Trustees are responsible for complying with the law in relation to data protection for their respective Sections. However, the Trustee does need a limited amount of personal information about a small number of individuals to run the Master Plan. Similarly, other parties involved in running the Master Plan will sometimes need to make decisions jointly with the Trustee about how your personal information will be used for those purposes. These other parties (our '**Trustee Advisers**') include our Administrators (Isio Pensions Limited).

In legal terms, we are 'joint data controllers' or 'controller' 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 Trustee does with your personal information, and also what the Trustee Advisers do 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 Trustee and the Trustee Advisers where they are acting as joint data controllers in relation to your personal information (as described above).

What personal information we have

The Trustee holds some or all of the following types of personal information:

- Your name, date of birth, national insurance number and salary information (where relevant).
- Contact details (including your address, phone number and email address).
- Your gender. We only use this, if you provide it as part of your addressee details if we write to you, e.g. 'Mr, Mrs, Ms'.
- If your benefits from a Section of the Master Plan derive from your employment, details of your employer when you were building up benefits in the Master Plan, how long you worked for them and your salary from time to time.
- Section Trustee signature (if signing e.g. a deed).

Where we get personal information from

Some of the information the Trustee has comes directly from you. In addition, Isio Pensions Limited may have obtained information from you and passed it to the Trustee. The Trustee may then in turn pass information about you to the Trustee Advisers or may instruct the administrator to do so. If the Trustee asks you for other information in the future, 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 Trustee must by law provide benefits in accordance with the Master Plan's governing documentation and must also meet other legal requirements in relation to the running of the Master Plan.

The Trustee 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 Trustee may need to share your personal information with other people for this reason, such as courts and law

enforcement agencies. We may need to share it with the Pensions Regulator and the Information Commissioner's Office to answer questions in the usual way or report things to them.

The Trustee also has a legitimate interest in properly administering the Master Plan and ensuring that the expected standards of Master Plan governance are met (including standards set out in Pensions Regulator guidance).

In order to achieve this, the Trustee may share your personal information with various people, including: any new trustees (whether at Master Plan or Section level); the Master Plan Provider (currently Isio Pensions Limited); Section Employers; the Master Plan administrator; the Trustee's other professional advisers; auditors; insurers (more on this below); independent financial advisers; HMRC; the Pensions Ombudsman; IT and data storage providers and other service providers such as tracing agencies who we use to try to trace you if you are not at the address we have on your record and also mailing companies who print and post letters and documents to you on our behalf. If your benefits are transferred to another scheme, the Trustee may also need to provide the administrators of that scheme with information about you.

When the Trustee needs to use information about your health (or other very personal information), they may ask for your consent. However, sometimes there may be reasons of public interest or law which enable the Trustee to use this information without consent, and they will do so where that is necessary to run the Master Plan in a sensible way. You can withdraw your consent at any time by contacting the Trustee using the contact details given below. This may affect what the Trustee can do for you, unless they have another lawful reason for using your information. The Trustee 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 Master Plan.

The Master Plan's Provider and employers may also have a legitimate interest in contacting you about your benefits under the Master Plan, and any additional options which may be available to you in relation to those benefits, which tend to be called employer led 'exercises'. In such circumstances, the Trustee may share your personal information with those parties so that they can contact you for that purpose. The Trustee would assess whether the sharing with the Master Plan's employers is justified by what is called 'legitimate interests'. For this the Trustee would generally assess whether your own interests, rights and freedoms under data protection laws are looked after when also considering the legitimate interest of the employer in wanting to carry out the exercise. In this way the Trustee can protect your own rights under data protection laws.

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 Advisers) 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 data 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 Advisers 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 Trustee and they will put you in touch with them.

How long we keep your personal information for

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

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 personal information that we hold will be kept for a maximum period of 25 years from the date of completion of the winding up of the Master Plan.

Please note, Master Plan Trustees Ltd's Independent Trustee Director (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as Trustee even when it is no longer a Trustee Director of the Master Plan. Information about PAN's approach in this situation to data protection compliance as a firm can be found at https://www.pantrustees.co.uk/Scheme-GDPR/.

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

If your request to access your personal information is complex (for instance, because of the volume and other factors) trustees can by law take up to 2 more months to respond to it (in addition to the 1 month usual statutory deadline) if that is necessary. We will explain this at the time of a request to make sure you are aware of this then too.

The Trustee has agreed with each of the Trustee Advisers that the Trustee 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 Trustee and the Trustee Advisers for what they do jointly with your personal information, you should contact the Trustee using the details below.

In addition to the above rights, under the Data (Use and Access) Act 2025 individuals have the right to complain directly to the Data Controller in the event of a data breach or concern in relation to the processing of personal data. For more information in relation to this, please use the Master Plan administrator's contact details below to request a copy of the Master Plan Trustee Data Complaints Process.

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 under what is called a 'restricted transfer'. This means a transfer to a country or territory which needs a mechanism to be lawful under data protection laws. Mechanisms include things like 'standard contractual clauses' - these are contracts for transfers of personal information to countries and territories which do not have appropriate data protection laws as compared with the data protection laws applicable in 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 safeguards).

Queries and further information

If you want more information about what we do with your information and what your rights are, please contact the Trustee via the Master Plan administrator at:

Paul Yates
Isio Pensions Limited
4th floor, LDN:W,
3 Noble Street,
London,
EC2V 7EE

Telephone: 020 8154 5008
Email: paul.yates@isio.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.