

FRAMLINGTON GROUP PENSION PLAN ('the Plan')

Privacy notice from the Plan Trustees

The Trustees of the Plan (the "Trustees", "we" or "us") are committed to protecting your information and acting in accordance with your rights under data protection law.

This privacy notice contains information on what information the Trustees collect, what we do with that information, the lawful basis on which your information is processed, and what rights you have.

Please read this notice carefully. If you have any questions or comments, please contact us using the contact information at the end of this document.

Collection of your information

We collect and process the following information about you:

- **your personal details** such as your name, gender, date of birth, home address (including postcode), telephone number, e-mail address, national insurance number, bank account details (in some cases), marital status, dependants and country of residence;
- **information relating to your benefits**, including your member identifying number (which is assigned to you by the Plan), the date you joined or left the Plan, your membership status (active, deferred, pensioner), your earnings and pensionable earnings, the category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, and any relevant matters impacting your benefits such as pension sharing orders, tax protections, or other adjustments that may occur when you join, leave or retirement from the Plan, or in the event of your death;
- **records of our 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 it is necessary to run the Plan and pay benefits, we also collect information about **your nominated beneficiaries, dependants (including dependent children), next of kin or individuals who hold power of attorney for you**. Before providing us 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 (as opposed to being obtained from you):

- AXA Investment Managers Limited
 - Mercer, who currently administers the Plan on a day to day basis on our behalf
 - Your legal personal representatives
 - Other pension schemes (if you have transferred benefits from them)
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- Government departments such as Her Majesty's Revenue & Customs (HMRC) and the Department for Work and Pensions (DWP)
- Publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and we are trying to find you.

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

How we use your information

We use your information for the following purposes:

- 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, or the request of your duly authorised advisers, such as in relation to transfers to other schemes;
- for general administration and management of the Plan and its assets**, including: to record and pay benefits; for actuarial valuations and calculations; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (such as member tracing should we happen to lose contact with you) or to prevent fraud;
- for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime**; for instance, by making disclosures to tax or social security authorities, and regulators, or performing anti-money laundering checks;
- testing and upgrading of systems** (where anonymised data cannot be used), to improve our processes and our use of technology, and to learn about other processes we can use to improve the administration of the Plan; and
- when we undertake or agree to activities from time to time to help us manage the liabilities of the Plan**, such as longevity modelling and hedging (to manage risk relating to how long pensions are paid), insurance, bulk transfers, and member option 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.

Our use of your information as described above is permitted by applicable data protection law because it is:

- necessary for our legitimate interests, without unduly affecting your interests or fundamental rights or freedoms. Examples of our legitimate interests include pursuing certain of the purposes in (a) to (e) above (in each case provided such interests are not overridden by your privacy interests)
 - required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
 - in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal data, necessary for establishing,
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exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain; and

- (iv) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or direct us on benefit payments or where the Plan Rules require you to provide information which we cannot otherwise process without your consent.

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

Disclosures of your information

To run the Plan and pay benefits, we may share your information with the following recipients:

- our suppliers, including AXA Investment Managers Limited and other providers of services to us and them, such as administrators (including Mercer, the administrator of the Plan), banks and deposit takers, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Plan actuary (for actuarial calculations), and printing, communication, IT and hosting, marketing, and tracing providers;
- AXA Investment Managers Limited where necessary for our legitimate interests in pursuing the purpose set out in (e) above;
- insurance and reinsurance companies, such as when we carry out the activities referred to in (e) above;
- public authorities, regulators or government bodies (such as HMRC and the Pensions Regulator), 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 those of the Trustees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

We have measures in place to protect the security of your personal information and keep it safe. We review these measures regularly to make sure they remain appropriate. Also, when we share information we take steps, where possible, to ensure recipients meet our data security standards, so that your personal data remains secure.

Transfers of your information abroad

The data that we collect from you will be processed inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to respond to any queries that you may have. Where this

applies, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

If data is transferred outside the UK or the EEA in other circumstances, we will ensure that the transfer is to a country covered by a decision of the Commission of the European Union or is otherwise made in circumstances where appropriate safeguards are in place to protect your data in accordance with the data protection laws.

Retention of your information

We 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, we will keep your information for the longer of (i) the period required in order to meet our legal or regulatory responsibilities, and (ii) the period envisaged within our retention management policy documentation.

We determine the period envisaged within such documentation with reference to the Plan'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 Plan, and responding to legal claims or regulatory requests.

The Trustee will never process or hold on to data for longer than the life of the Plan plus 15 years.

Please note, the Plan'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 Plan.

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 or object to its processing, to tell us that you do not wish to receive marketing information, and (in some circumstances) to require certain of your information to be transferred to you or a third party. If you have any questions or wish to exercise any of the above rights, you can contact us 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 our processing of your personal information with the office of the Information Commissioner (www.ico.org.uk).

More information about your rights is provided in the Appendix to this notice.

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. We will notify you when your information is required for this purpose.

Changes to personal data

We are committed to keeping your information accurate and up to date. Therefore, if your personal data changes, please inform us of the change as soon as possible.

Status of this privacy notice

This privacy notice was updated in January 2023. It is a notice explaining what the Plan does, rather than a document that binds us contractually.

We reserve the right to amend the notice from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, taking into account how we normally communicate with you.

The Trustees of the Framlington Group Pension Plan

c/o The Secretary to the Trustees
Mercer
Tower Place West
London
EC3R 5BU

Other Controllers

Other parties that also need personal information about you in order to support the running of the Plan are:

- The appointed Scheme Actuary, employed by Mercer.

In legal terms they are also 'data controllers' and are required to tell you some things about the personal information they have about you, how they use it and what your rights are in relation to it.

They have produced their own information statement around this, which you can obtain on request by emailing <https://contact.mercer.com/>

APPENDIX

YOUR RIGHTS

Your rights under data protection laws include:

- a) The right of access to personal data relating to you (known as 'Subject Access Requests')
- b) The right to correct any mistakes in your information
- c) Rights in relation to automated decision taking
- d) The right to restrict or prevent your personal data being processed
- e) The right to erasure

These rights are described in more details below.

Your right to access personal data relating to you (known as 'Subject Access Request')

You may ask to see what personal data we hold about you and be provided with:

- A copy of your data
- Details of the purpose for which it is being or is to be processed
- Details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers
- The period for which it is held (or the criteria we use to determine how long it is held)
- Any information available about the source of that data.

To help us find the information easily, please give us as much information as possible about the type of information you would like to see.

Your right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold. If you would like to do this, please let us know the information that is incorrect and what it should be replaced with.

Your rights in relation to automated decision-making

You have the right to ask us to manually review any automated decisions we make about you.

Your right to prevent processing of personal data

You may request that we stop processing your personal data temporarily in the event of any of the following:

- You do not think that your data is accurate. In this case we will start processing again once we have checked whether or not it is accurate
 - We no longer need the personal data for our processing, but need the data to establish, exercise or defend legal claims
 - You have objected to processing because you believe that your interests should override our legitimate interests.
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Your right to erasure

You can ask us to erase your personal data where:

- You do not believe that we need your data in order to process it for the purposes set out in this privacy notice
 - You had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data
 - You object to our processing and we do not have any legitimate interests that mean we can continue to process your data.
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