

DATA PRIVACY STATEMENT

Alwen Hough Johnson Pension and Assurance Scheme

Trustees' commitment to your privacy

The Trustees are committed to protecting and respecting your privacy and rights. This Privacy Statement ("**Statement**") gives you information about the Trustees, how they will collect and use personal data about you, the circumstances in which they may share or otherwise use the personal data and to whom they may disclose this personal data.

The Trustees are data controllers in respect of the personal data they collect about you for the purposes of data protection legislation, by which we mean:

- a) the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (The "Exit Regulations").
- b) the EU legislation EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. (The EU "General Data Protection Regulation", "EU GDPR").
- c) The EU GDPR as retained in domestic law (The "UK GDPR").
- d) EU Directive 2002/58/EC of 12 July 2002 concerning the processing of personal data and the processing of privacy in the electronic communications sector (the "ePrivacy Directive").

The Trustees' address is 2 Minster Court, Mincing Lane, London, EC3R 7BB.

Information the Trustees may collect from you

The Trustees may collect and process personal data which you provide to them in connection with the Scheme including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it. This may include data about your age, date of birth, gender and marital status. Also included may be your length of employment with the Alwen Hough Johnson group (**the "Employer"**) and details of your dependents and other persons in your household, and your contact details (e.g. residential address, email address and telephone number).

Information the Trustees may collect about you from the Employer or third parties

The Trustees may collect personal data about you from the Employer or third parties. This may include information relating to your employment, your salary and your benefits, to the extent relevant to your pension and related arrangements. Periodically, the Trustees may collect personal data relating to you from third parties such as former employees or regulatory authorities.

Purposes for which and the basis upon which the Trustees will process your personal data

The Trustees will process your personal data and the personal data of other persons (e.g. your dependants) provided by you to us in connection with the administration of benefits of your pension and related benefit entitlements arising as a result of your employment with the Employer.

Generally, the Trustees will rely upon the "legitimate interests" ground as the legal basis for processing your personal data. This means that the Trustees will process personal data for the legitimate interests of themselves or a third party to whom they may disclose personal data in accordance with this Statement. The legitimate interests are the administration of the

Scheme in order to pay each member's benefits (provided always that the legitimate interests are not overridden by the interests or fundamental rights or freedoms of Scheme members (or others) which may require protection of personal data). In certain circumstances the Trustees may also rely upon the lawful basis that the processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.

Where the Trustees are required to process special categories of personal data (which is defined in the data protection legislation and which includes ill-health information), they will approach you or the relevant individuals for specific consent to the processing of such data.

Storage of personal data

The Trustees will hold personal data of Scheme members and their dependants for as long as may be necessary in order to administer benefit entitlements and for the purposes of maintaining records of steps the Trustees have taken to comply with their obligations under the Scheme. Inevitably, this means that personal data may be retained by the Trustees for extremely long periods of time, including after entitlement to receive benefits by an individual and/or their beneficiaries has ceased. The majority of the personal information that we hold will be kept for a period of 75 years from the end of the Scheme year in which the last payment from the Scheme is made to or in respect of you. The Trustees may also retain personal data for a longer period to comply with legal and regulatory obligations.

Disclosure of personal data

In the course of administering the Scheme, the Trustees will engage pensions administration service providers, tracing agencies, a scheme actuary, lawyers and accountants and similar external advisors to assist them. The Trustees may disclose your personal data to these third parties in connection with services provided by the third parties to the Trustees. At all times, the Trustees will ensure that the personal data is processed in accordance with their instructions and in circumstances which require the recipient to observe industry standard security measures in respect of the personal data.

The Trustees may also disclose your personal information to third parties in the following types of situations:

1. in the event that they wish to enter a buy-out/buy-in of any of the benefits under the Schemes, in which case they may disclose your personal data to the prospective counterparty to such a transaction; or
2. if they are under a duty to disclose or share your personal data in order to comply with any legal obligation.

International transfers of personal data

As required by data protection legislation, the Trustees have strict security procedures regarding the storage and disclosure of personal data. The personal data that they collect about you may be transferred to, and stored at, one or more countries outside the UK and the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK, or the EEA who work for the Trustees or for our third parties. In such cases, the Trustees will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under both the UK GDPR and the EU GDPR and as described in this Statement. If the Trustees cannot ensure such an adequate level of data protection, your personal data will only be transferred outside the UK, or the EEA if you have given your prior consent to such transfer.

Your rights under the Data Protection Regulations

You have rights under the Data Protection Regulations, including the right to access the personal data the Trustees hold about you, to rectify or erase such personal data and to ask us to stop processing your personal data. However, if you ask the Trustees to erase or stop processing your personal data, they may be unable to properly administer the Scheme or process any benefits for you, and if they have compelling legal grounds to continue to process your personal data, they may continue to do so. You may address your requests to the Scheme's Administrator, First Actuarial LLP, at Fosse House, 182 High Street, Tonbridge, Kent, TN9 1BE.

Changes to this Statement

The Trustees reserve the right to change this Statement and any other relevant policies or procedures at any time without notice to you. Any changes we may make to this Statement in the future will be notified to you and you are advised to regularly check and review the Statement to ensure you understand how we may be processing your personal data. Any changes the Trustees may make to this Statement (which will, unless otherwise indicated, apply to any personal data already obtained by the Trustees before the changes were made) will be effective from the date on which those changes have been notified to you. Where appropriate, they may also notify you of any changes made by e-mail.

Data Protection

The Trustees will not disclose or transfer personal data to third parties for the purposes of marketing.

Contact

If you have any questions concerning this Statement or the policies or procedures referred to above, please contact the Trustees via the Scheme's Administrator, First Actuarial LLP, at Fosse House, 182 High Street, Tonbridge, Kent, TN9 1BE.

Where you are dissatisfied with any aspect of our handling of your personal data you have a right to lodge a complaint with the Information Commissioner's Office. Their contact details are:

Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 or 01625 545 745
Fax: 01625 524 510
Email: casework@ico.org.uk