

Fluid Transfer Retirement Benefits Scheme

Privacy Notice 2025

This privacy notice is being issued to you on behalf of the Trustees. Please read it carefully as it contains important information.

This privacy notice describes what personal data we collect about you and other people whose personal data may be provided to us in connection with your Scheme membership, for example, your spouse, civil partner, partner or dependants.

Personal data is any information that could be used to identify a living individual.

This privacy notice also describes how we process (i.e. handle) your personal data, the basis upon which we process it, with whom it is shared, how it is stored and certain other important information relating to the protection of your personal data.

What personal data do we collect about you and how?

We collect personal data from you in a number of different ways:

- you may share information with us (for example, when you join the Scheme or when you apply for benefits);
- we may collect certain personal data from third parties (for example, your current or former employer);
- we may also generate certain personal data in our running of the Scheme (for example, information relating to your contributions and benefits).

We collect personal data from the following third parties:

- your current or former employer;
- providers of services that allow us to verify the accuracy of your personal data (for example, to trace your current address or to verify your continuing existence); and
- government agencies (for example, HM Revenue and Customs (HMRC) or the National Insurance Contributions Offices (NICO)).

We may collect and use the type of data set out below.

In certain circumstances, we may ask you for information relating to your health; for example, if you cannot work any longer due to incapacity and you want to take your pension benefits early. We will only ask for as much health information as we

need. We will explain to you at the time why we need that information and how we intend to use it.

We will only process 'sensitive' or 'special categories' of personal data (e.g. information about your health) where you have explicitly consented to this or where there is an alternative legal basis for processing this information. This may mean that you will be asked to sign consent forms in the future.

How do we use your personal data?

We primarily use your personal data for the purposes of operating the Scheme; for example, to process any application to join the Scheme, to calculate and pay your benefits, to communicate with you and to make decisions about you and your entitlements (as well as about the Scheme more generally).

We may also use your personal data for the purposes of complying with any laws, procedures and regulations that apply to us and to establish, exercise or defend our legal rights.

We may occasionally use your personal data for the purposes of statistical analysis or to respond to government surveys (for example, questionnaires sent to us by the Pensions Regulator or the Office for National Statistics) but this is usually completed on an anonymous basis.

If we wish to use your personal data for any other purpose, we will update this privacy notice.

What is our lawful basis or ground for using your personal data?

Under laws that are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.

As Trustees, we have certain duties and powers, which are conferred on us by law or by the Scheme's governing documents. In most cases, our processing of your personal data is necessary for the performance of those duties and exercise of those powers.

Certain uses of your personal data, or other processing activities, may not be strictly necessary to perform our legal duties, or to exercise our powers; however, they may be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests.

When we say "legitimate interests", we mean ours (or a third party's) interests in operating the Scheme as efficiently and securely as possible. For example, we may choose to use a third party to store your personal data; we may do this in part because our use of that service means that your personal data is more secure. Such a third party would, in this situation, have a legitimate interest in processing your personal data, but would do so subject to terms agreed with us.

If we are processing personal data in a certain way because it is in our (or a third party's) legitimate interests (not, for example, because it is necessary for the performance of our legal duties), you have the right to object to this processing.

In certain circumstances, we may need your consent to collect and use your personal data; this is most likely where we are collecting information relating to your health in relation to an application for an early retirement pension or where we obtain information that may reveal your racial or ethnic origin, religious or similar beliefs, sex life or sexual orientation for the payment of death benefits. If we have asked for your consent, you may withdraw your consent at any time.

You may withdraw your consent, or object to our processing of your personal data in a certain way (where you have the right to do so), by contacting the Trustees using the details shown at the end of this notice.

In what circumstances do we share your personal data?

We may share your personal data with the following categories of third parties:

- your current or former employer;
- our administrators – we delegate some of our duties as Trustees to administrators; they are effectively responsible for the day-to-day running of the Scheme;
- the Scheme actuary – this is an actuary that is personally appointed to the Scheme to provide us with advice on the funding of the Scheme;
- our benefit consultants – they provide advice on all aspects of running the Scheme including the level and form of benefits to be provided to members of the Scheme, investment, member communication and strategies for managing and mitigating the risks associated with the Scheme;
- insurers – they provide insurance cover for the payment of death benefits and / or provide annuity policies securing the Scheme benefits;

- our investment managers – they invest the Scheme assets on our behalf;
- our auditors – they prepare or review the Scheme's annual accounts and audit them for us;
- our lawyers – they advise us on all legal issues affecting the Scheme;
- our covenant advisers – they advise us on the financial support that your current or former employer may be able to provide to the Scheme;
- other companies that provide services to us (or to our administrators), such as suppliers of data cleansing, verification and tracing services and information technology systems suppliers and support, including providers of data storage, email archiving, back-up and disaster recovery and cyber security services.

Details of all of the third parties with whom we share your personal data are available in the Scheme's annual report and accounts, which are available on request from the Trustees using the contact details shown at the end of this notice.

Some of these third parties may process your personal data in countries that are outside of the UK. Please see below.

We will also disclose your personal data to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or any lawful request from any legal or regulatory authority; or
- to respond to any claims, and to establish, exercise or defend our legal rights.

Most third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for the specific purposes identified by us.

Certain third parties (most notably, the Scheme actuary and other professional advisers) are themselves subject to certain legal or regulatory obligations (including professional codes of practice). They will be responsible for their own processing of personal data to the extent that processing is subject to, or relates to, those obligations. Such third parties will have their own privacy notice; please use the contact details below to request details of where these privacy notices may be accessed.

We will always ensure that any third parties with whom we share your personal data are subject to privacy and security obligations consistent with this privacy notice and applicable laws.

Do we transfer your personal data outside the UK?

In certain circumstances, your personal data may be processed outside of the UK; for example, third party service providers may store certain personal data in a country outside the UK.

If we (or our service providers) process personal data outside of the UK, we will take appropriate measures to ensure that your personal data is adequately protected in a manner that is consistent with this privacy notice, and in accordance with applicable laws. Those measures include:

- in the case of US based service providers, entering into approved standard contractual arrangements with them, or ensuring they have signed up to any protocols in place between the UK/EU and the US, such as the EU-US Data Privacy Framework ; or
- in the case of service providers based in other countries outside the UK, ensuring that they are based in countries that have been deemed, by the Information Commissioner's Office, to be adequate, or entering into approved standard contractual arrangements with them.

Further details on the steps we take to protect your personal data in these cases are available from us on request by contacting us using the details at the end of this notice.

How long do we retain your personal data?

We keep your personal data for no longer than we need to for the purposes for which we use it as set out above.

We will need to keep most of your personal data for as long as you are a member of the Scheme. If you die, we will continue to hold your personal data because we may need to pay benefits to your spouse, civil partner, partner or dependants. If your spouse or dependants subsequently die or you transfer out of the Scheme during your lifetime, we may also keep your personal data for a period of at least six years for the purposes of defending any future claims or establishing, exercising or defending our legal rights.

What are your rights in relation to your personal data?

You have certain rights in relation to your personal data; those rights will not necessarily apply in all cases or to all personal data that is processed by us. For example, certain rights will not apply where we need to process personal data to comply with our legal duties as Trustees.

You have the right to request that we:

- provide you with a copy of any personal data that we hold about you;
- update any of your personal data that is out of date or incorrect;
- delete any personal data that we hold about you, although in these circumstances it may be difficult to provide you with continued Scheme membership/benefits;
- restrict the way that we process your personal data;
- consider any valid objections that you have to our use of your personal data; or
- provide your personal data to a third party provider of services.

We will consider all such requests (including whether they apply in a particular case) and provide our response within the time period state by applicable laws.

When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

How do we keep your personal data secure?

We are committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access and destruction and take all reasonable precautions to safeguard the security of personal data.

Although we make every effort to protect the personal data that you provide to us once it is in our possession or control, the transmission of information over the internet is not completely secure. We cannot guarantee the security of personal data transmitted to us over the internet, and any such transmission is at your own risk.

Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access (and take steps to ensure that any third parties with whom we share your personal data do the same).

Where we have given you (or where you have chosen) a password that enables you to access an account relating to your membership of the Scheme, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Changes to this privacy notice

We may amend this privacy policy from time to time. Any changes we make to our privacy policy in the future will be notified to you in the next communication from us to you such as the regular summary funding statement, your regular deferred benefit statement (if sent), member newsletter, popular report and accounts or an updated version of the Scheme explanatory booklet.

Further questions or making a complaint

If you have any queries or complaints about our collection, use or other processing of your personal data, or if you wish to exercise any of your rights in relation to your personal data, please contact the Trustees using the details opposite. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal data

You may also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection regulator.

Personal data we process

We may collect and use the following types of personal data about you and, in some circumstances, your spouse, civil partner, partner or dependants:

- name(s);
- gender;
- national insurance number;
- data of birth
- home address and telephone number;
- personal e-mail address;
- marital status;
- your current or former employer;
- dates on which you joined and left pensionable service;
- your salary information;
- your status as a member of the Scheme;
- information relating to your contributions to and benefits under the Scheme;
- information relating to benefits under other pension arrangements of which you may be (or may have been) a member;

- tax information including your income tax band and any protections that you may have in relation to your pension benefits;
- your bank account details.

Defined terms

In this privacy notice, the following terms have the following meanings:

Scheme means the Fluid Transfer Retirement Benefits Scheme

Trustees, us, we or our means the trustees of the Scheme being such individuals or companies who act as trustees from time to time.

The Trustees may be contacted via:

The Trustees of the Fluid Transfer Retirement Benefits Scheme
c/o Broadstone Corporate Benefits Ltd
Broadstone House
23-25 St George's Road
Bristol
BS1 5UU

Tel: 0117 937 8700

Email: fluid-transfer@broadstone.co.uk

This privacy policy was last reviewed and updated in May 2025