

George Fischer Pension Scheme (the 'Scheme')

Privacy Notice ("Notice")

This notice explains how the Trustees of the Scheme, uses and protects the personal information that it holds about members and other beneficiaries of the Scheme.

The General Data Protection Regulation ("GDPR") came into force in the UK on 25 May 2018 and will apply broadly, to all persons holding personal and sensitive data. Its purpose is to give you more control over your data and how it is used.

The Trustees are a "controller" for the purposes of the data protection laws. Previously, the data protection laws are set out in the Data Protection Act 1998. These were replaced by new data protection laws with effect from 25 May 2018. We refer to both the current and the new data protection laws as the "GDPR" in this privacy notice.

In some circumstances the Scheme Actuary and Gallagher Benefit Services ('Gallagher') will also be data controllers in relation to the personal data you provide. The Scheme Actuary and Gallagher (where applicable) will process your personal data in accordance with this Notice. In these circumstances, the Trustees, Scheme Actuary and Gallagher will each be a 'data controller'.

You should share this notice with your family and dependants where you have provided us with personal information about them.

If you have any queries related to this Notice please contact:

The Trustees of the George Fischer Pension Scheme
Paradise Way
Coventry
CV2 2ST
Email: ukpensionsinfo@georgfischer.com

1 About this document

In order to administer the Scheme we will process personal data (which may be held on paper, electronically, or otherwise) about the Scheme's members and we recognise the need to treat it in an appropriate and lawful manner, in accordance with GDPR. The purpose of this notice is to make you aware of how we will handle your personal data.

This privacy notice is current as at 1 January 2025.

We keep our privacy notice under regular review, and may change it at any time. We will tell you about any significant changes.

'personal data' means information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you.

'processing' means doing anything with the data, such as accessing, storing, disclosing, transferring, destroying or using the data in any way.

2 How we use your personal data

We process the following types of personal data:

- personal details such as your name, gender, age, date of birth, contact details (e.g. your address and postcode, email, telephone and mobile numbers), and identifiers such as your National Insurance number, pension or member reference number and employee number (where applicable);
- details of your family, lifestyle and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants;
- financial details such as that about income, other pension arrangements, bank account details (e.g. to process pension payments) and tax code; and
- employment details such as your earnings, length of service, employment and career history, recruitment and termination details, absence record, job title and job responsibilities.

We may process sensitive personal data relating to you including, as appropriate:

- information about your physical or mental health or condition (where there is a legal basis for the processing of such data under applicable law).

We will process data about:

- members and beneficiaries;
- service providers and advisers;
- trustees; and
- employers.

We process the above personal data:

- for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example: to calculate and pay benefits. This includes providing you with

details of your benefits and options under the Scheme and dealing with any queries that you have about these;

- to carry out our obligations arising from any agreement that we have with, or concerning, you to provide you with the information, benefits and services that you request from us;
- to notify you about services provided to members of the Scheme and any changes to those services or to enable you to access those services;
- for statistical, financial modelling, accounting and reference purposes;
- for internal record keeping;
- for risk management purposes, including the insurance or management of longevity risks and related demographic risks or of the Scheme's benefits;
- complying with our legal obligations, any relevant industry or professional rules and regulations or any applicable voluntary codes;
- complying with demands or requests made by any relevant regulators, government departments and law enforcement or tax authorities or in connection with any disputes or litigation; and
- in connection with any sale, merger, acquisition, disposal, reorganisation or similar change of business relating to the sponsoring employer or its associated companies.

3 Fair, lawful and transparent processing

We will only process your personal data for the specific purpose or purposes notified to you, purposes which are compatible with those original purposes or for any other purposes specifically permitted by GDPR. As a "data controller", we must process this information fairly and lawfully.

We need to hold and process information about you for us to administer the Scheme, and to calculate and pay benefits. Under the legislation, this means that we have a legitimate interest in processing the information. We will not collect any personal data from you that we do not need.

We may also need to hold and process some sensitive information about you and/or your dependants and beneficiaries. Except where the legislation allows it, this information cannot be processed or passed to a third party without your explicit consent. We will only collect any sensitive personal data from you when it is needed, for example, information about your health if you apply to receive your benefits on the grounds of ill health.

4 Data retention

We recognise that personal data should only be retained for so long as necessary. However, as a general principle the Trustees believes that it is necessary to retain personal data indefinitely. Retaining personal data for this length of time is in line with our obligations, our legitimate interests and is in the interests of members of the Scheme. This is because it is important to be able to demonstrate that any payments have been made correctly, that our liabilities have been discharged and so that we will be able to respond to any queries raised in the future.

The Scheme administrators, Gallagher, (subsequently referred to in this document as the "**Scheme Administrator**"), have advised that they will:

- hold information for as long as is necessary for the purposes of administering the Scheme and they may continue to process information if/when the Scheme winds up or if we changed to a different provider of scheme administration services;
- hold data to reflect statute of limitations periods and in some cases given the length of the applicable limitation period they may keep personal data indefinitely;
- operate procedures from 25 May 2018 to check that unnecessary data is not received and stored;
- destroy any special categories of personal data held in respect of data subjects if we or you instruct them to do so where they are required to do so to comply with their GDPR obligations; and
- hold personal data where they consider it is necessary in order to exercise or defend a legal claim, whether actual or potential.

5 Data security

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if that third party agrees to comply with those procedures and policies, or if they put in place adequate measures themselves.

Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

6 Providing information to third parties/data sharing

We sometimes need to share the personal information we process with other organisations. Where this is necessary, we are required to comply with all aspects of GDPR.

We share information with the Scheme administrator. We would also highlight that:

- the Scheme Administrator, acts as a data processor and processes member data in order to provide the administration services to the Scheme, on behalf of the Trustees.
- the Scheme Administrator also provides actuarial and consultancy advice to the Trustees of the Scheme, including through the Scheme Actuary. When providing actuarial services, the Scheme Actuary acts as a data controller jointly with the Trustees.

We also share information with:

- the Scheme's other professional adviser, including legal advisers Eversheds Sutherland LLP and auditors RSM UK Audit LLP. These organisations use the information when advising the Trustees and carrying out their respective professional obligations;
- the Scheme's insurers (and other insurers for the purpose of obtaining quotations relating to the Scheme or its benefits), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the Trustees or sponsoring employer to advise you about your options under the Scheme or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Scheme;
- any other person who is authorised to act on your behalf;
- companies within the sponsoring employer's group and their professional advisers;
- regulators, government departments, law enforcement authorities, tax authorities and insurance companies;
- any relevant ombudsman, dispute resolution body or the courts;
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in business relating to the sponsoring employers or its associated companies;
- pension schemes with which the person whose data we are Processing has an association;
- healthcare, social and welfare organisations; and
- current, past or prospective employers.

7 International

The Scheme Actuary is appointed by the Trustees to value the Scheme benefits and, together with Buck Consultants Limited, carry out other calculations in relation to your Scheme benefits. They will use your personal information for this purpose and have a legitimate interest in doing so. They will

also use your personal information to comply with their own legal obligations, and may need to share your details with other people for legal reasons, such as courts and law enforcement agencies. They may also share it with their own professional advisers, auditors and insurers, IT and data storage providers and other service providers.

Sometimes, your information may be used by the Trustees and the Scheme Actuary/Buck Consultants Limited for statistical research, but only in a form that no longer identifies you. In some circumstances the Scheme Actuary and Buck may also be able to fulfil the purpose mentioned above using information which the Trustees has anonymised before sharing with them.

8 International

We do not hold data internationally. However, it may sometimes be necessary to transfer personal information overseas. When this is needed information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of GDPR.

9 Your rights

Access to your information – You have the right to request a copy of the personal information about you that we hold.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask us to delete personal information about you where:

- you consider that we no longer require the information for the purposes for which it was obtained;
- we are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below;
- you have validly objected to our use of your personal information – see *Objecting to how we may use your information* below; and
- our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – You can object to your personal data being processed, although we can override this objection in certain circumstances.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you

have made to our use of your information. The right might also apply if we no longer have a basis for using your personal information but you don't want us to delete the data.

Withdrawing consent using your information – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

You should be aware that taking any of the above steps could impact on the payment of your benefits and our ability to answer questions relating to your benefits.

10 Complaints

If you are not happy with the way in which your personal information is held or processed, please contact Buck using the details below. You also have the right to complain about data protection matters to the Information Commissioner's Office (ICO).

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113.

The Trustees wish to ensure that all personal data they hold is correct and up-to-date. They can only achieve this with your help. If you notice any of the personal data the Trustees hold in relation to you is incorrect (such as incorrect name or address information), or if you change your personal circumstances, please advise the Scheme's administration team in the first instance. They can be reached as follows:

Phone: 0330 678 2719

Email: Georgefischer@ajg.com

Post: Gallagher
PO BOX 321
Mitcheldean
GL14 9BG

Yours faithfully,

David Outhwaite
Chair of the Trustees, for and on behalf of the Trustees of the George Fischer Pension Scheme