

**THE ALIAXIS UK DEFINED BENEFIT PENSION SCHEME (the "Scheme"):
PRIVACY NOTICE**

We, Huw Davies, Don Bailey, Joerg Boder, Gavin Young and Steve Emmott, as the trustees of the Scheme (the "**Trustees**"), hold and process personal data about Scheme members and beneficiaries in order to run the Scheme. In doing so, we comply with relevant data protection legislation.

What we do with your data

As a data controller, the Trustees collect and process your personal data for the purposes of complying with its legal duties to administer the Scheme and for other legitimate purposes relating to the operation of the Scheme. This processing includes the calculation, administration and payment of benefits under the Scheme before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, investment of the Scheme's assets, securing Scheme liabilities, dealing with any queries or complaints regarding benefit entitlements.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by Aliaxis Holdings UK Limited, the company that sponsors the Scheme (the "**Company**"), other participating employers in the Scheme, HMRC, the DWP, regulatory bodies and tracing organisations.

We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death. We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the Scheme.

The data we hold is to assist the Trustees to calculate and pay the benefits to which members are entitled, and this includes your name, maiden name (if applicable), address, salary, years of service with the Scheme, date of birth, NI number, contact details (including telephone number, mobile number and/or email address), financial information (such as bank account details and pension entitlement), online identifier (e.g. IP address), gender, marital status, employment/ retirement status and start date and leave dates with the relevant employers and the Scheme.

We also hold some special categories or "sensitive" data about individuals for the purposes of administering the Scheme (for example in relation to ill-health or death benefits). We will in most circumstances process this data in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). We may also, typically when considering claims under the Scheme's Internal Dispute Resolution Procedure, process any sensitive data for the purposes of establishing, exercising or defending legal claims. If there are any occasions where we seek your explicit consent to process your sensitive data, you can withdraw it at any time.

Who else processes your data?

We share your personal data with certain third parties involved in running the Scheme, for example, Capita Employee Benefits Limited ("**Capita**") as the Scheme Administrator, Guy Gregory of Willis Towers Watson as the Scheme's Actuary and Willis Towers Watson as actuarial support, CMS as the Trustees' legal advisers, The Preventative Healthcare Company Limited ("**PHC**") as occupational health advisers, the Company, the Company's advisers, the Scheme's auditor, Just Retirement ("**Just**") as buy-in providers and their reinsurers (a link to the reinsurer's privacy notice can be found at www.rgare.com/privacy-policy), third parties' administrators, additional voluntary contribution providers, printers, the

Scheme's bank account provider, and other regulatory bodies, for example HMRC, the Pensions Ombudsman, the Pensions Regulator and the Pensions Advisory Service

In some circumstances we are joint controllers with the Scheme Actuary, the legal advisers (who will process your data to comply with their professional duties as advisors to the Trustees) and the Company. The Company, and other group companies hold your data to comply with the legal obligations of the sponsoring employers of the Scheme. The Company and other employers have legitimate interest in the Scheme being run properly and effectively. The Trustees will share information with the employers, their auditors and other third party advisers for this purpose.

Just process some members' data as a data controller to take steps necessary for the buy-in insurance policy and to provide data to their reinsurer, administer the buy-in policies and comply with applicable laws and regulations.

The Company, Just and other advisers will from time to time transfer your data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards will be put in place.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Scheme is based on information which may go back many years. Our policy is therefore to retain information relating to you until your membership of the Scheme ends.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information may be held for longer where we consider it appropriate in order to ensure the Scheme pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time.

Capita will hold on to your personal data for 7 years after the termination of their contract with us. This is to protect themselves against any subsequent legal claims.

Where Just holds your personal data, they will retain this for 7 years after the Scheme ends in order to comply with their legal and regulatory obligations and to protect themselves against any subsequent legal claims.

Your rights

You have the right to access your personal data and require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances you can also require that we restrict the way we process your personal data or object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. You can exercise your rights by contacting Capita at Aliaxis@capita.co.uk or by phoning **01227 773910**. Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits to which you are entitled.

Contact details

If you have any questions about this notice, you can contact any of the data controllers listed above via Capita by emailing Aliaxis@capita.co.uk or by phoning **01227 773910**.

What if you have a complaint?

To make a complaint about how we have handled your information, contact us as set out above.

If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office. Its contact details are:

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745