PRIVACY NOTICE

Data protection regulation is extremely important to ensure that personal information is kept securely and used only for the right purpose. The Trustees and their advisers have been complying with Data Protection Laws since they were first introduced in 1998.

The Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, further tightens the protection of personal data. The 2018 Act doesn't just apply to pension schemes; the Act enforces the EU's general data protection regulation standards with which every company and organisation in Europe that has access to personal data must comply.

As Trustees of the Schneider Group of the ESPS we are required to write formally to all Scheme members to explain how your personal information will be used, who will have access to it and what rights you have.

The personal data that we and our advisers hold on our behalf is never sold to other organisations and is never used so that other organisations can sell you their products or services.

Why are the Trustees writing to me?

Under the regulations the Trustees are "Data Controllers". This means that we decide how and why your data is used and it is therefore the Trustees who need to write to you. As Data Controllers, the Trustees collect and process your personal data for the purposes of complying with their legal obligations to administer the Scheme and for the other legitimate interests relating to the operation of the Scheme. **This Notice is for information purposes only; you do not need to take any action in response to this Notice.**

What is personal data?

This is information that could be used to identify you as an individual. So things like National Insurance Number, date of birth, gender, marital status, employment dates, home address and bank details are all examples of personal data. We may also hold information about your relatives or dependants who may be considered as beneficiaries in the event of your death.

If you have used a pensions dashboard, this information could also be an electronic pensions identifier and personal data which was supplied by you to enable your Scheme pension to be located and information about it to be viewed on the dashboard.

Who has access to my data?

Where considered necessary in carrying out the administration and management of the Scheme your personal data may be shared with third party advisers and service providers appointed by the Trustees.

Personal data is looked after by the administration service provider appointed by the Trustees and is used to calculate your Scheme benefits. The Scheme Actuary needs access to some of that data in order to assess how well funded the Scheme is and sometimes to assist in calculating benefits and to provide other actuarial advice to the Trustees. The Scheme Actuary is Shelley Jeffery *FIA* of XPS Group, Phoenix House, 1 Station Hill, Reading, Berkshire, RG1 1NB.

The Scheme Actuary and XPS Group when providing defined benefits actuarial consulting services, are Data Controllers in common with the Trustees and so we share your personal information with XPS in order for them to provide these services. The XPS Privacy Information is available at https://www.xpsgroup.com/legal-regulatory/your-privacy. The relevant notice for you is labelled *"Combined Scheme Actuary & Actuarial Consulting services to pension schemes"*.

XPS may make changes from time to time so you should periodically check for the latest version of this Privacy Information at the link shown above.

We take your privacy very seriously and we ask that you read XPS's Privacy Information carefully as it contains important information on:

- The personal information we share with XPS in relation to the services provided;
- What XPS does with your information;
- Who XPS may share your information with; and
- What rights you have regarding XPS's holding of your information.

The Scheme Actuary may change. If you wish to know who the current Scheme Actuary is, please refer to the most recent Trustee Report and Financial Statements, or contact the Trustees.

From time to time, other organisations will also need access to your data, for example the Scheme Auditor will see limited amounts of personal data in order to ensure that the Scheme's finances are in order and the correct benefits are being paid out. The Scheme's legal advisor may need to be consulted on individual cases. If you are a pensioner we have to provide information to His Majesty's Revenue and Customs (HMRC) so that they know what tax has been deducted from your pension. We may also need to share your data with the Scheme's insurers and annuity providers (and other insurers or brokers for the purpose of obtaining quotations relating to the Scheme or its benefits). Additionally, a qualifying pensions dashboards provider, the Money and Pensions Service, or a third party integrated service provider (which facilitates the Scheme's connection to the pensions dashboard ecosystem) may need access to your data.

The Company also holds your data to comply with its legal obligations as the sponsoring employer of the Scheme. It also has a legitimate interest in the financial and general management of the Scheme and in the Scheme being run in a cost-effective way and may use personal data in connection with this, for example to offer members additional options to modify or transfer their benefits.

All of the organisations that need access to your personal data are required to comply with the data protection regulations. The Trustees and their advisers will also check to make sure that they are confident that your data will be secure. A full list of the organisations that we share your data with is available on request from the address shown at the end of this notice. Where any of these organisations are data controllers a copy of their privacy notice is available on request.

Where we have information in relation to proposed beneficiaries, who may become eligible to a benefit on a member's death, we will advise the individual of their data protection rights if a benefit becomes payable from the Scheme.

What will you do with my personal data and how long will you keep it?

The reason we hold individual member records (that contain personal data) is so that the correct benefits can be calculated and paid to members and other persons who qualify as beneficiaries of the Scheme. The Trustees' advisers and administration service providers require access to that information to ensure that members and their beneficiaries receive the correct benefits. We also hold personal data to comply with our duties in relation to pensions dashboards and data protection.

We will need to hold personal data for as long as is reasonably necessary to determine members' entitlements under the Scheme and to comply with our legal obligations in relation to the administration and management of the Scheme. This could be for many years, probably until long after your own death and until any dependant's pension ceases. In practical terms, there are often occasions when a review of historical member information is necessary. One of the most recent examples of this is HMRC's decision to cease the practice of contracting

out of the State Pension Scheme. In this case the Scheme Scheme administrators are looking back at records held up to 40 years ago to make sure that every members contracted out record is correct and in line with that held by HMRC.

The data that we collect from you will usually be stored inside the UK. However, if you live or work outside of the UK, we may need to transfer your personal data outside of the UK to respond to any queries that you may have. Data may also be transferred outside the UK where the Scheme's service providers host data outside the UK. 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.

These transfers will be governed by the Data Protection Laws. We may transfer your data outside the UK to a country which the UK government ensures a level of protection that is not materially lower than UK standards. This would include countries within the European Economic Area (EEA). If the transfer is not approved by the UK government, we may only transfer your data if appropriate safeguards are in place and we consider that the level of protection provided for data subjects is not materially lower than UK standards. You can contact us if you would like more information about these safeguards.

What rights do I have?

You already have the right to see your personal data held by the Scheme (this is known as a Subject Access Request) and you can require that we rectify any errors in data that we hold about you, but in addition, you will (under certain circumstances) have the right to be forgotten or have your personal information deleted. However, as far as the Scheme is concerned, without your personal information the administrator would not be able to calculate your Scheme benefits.

For pension schemes there are legal and valid reasons why your data is kept and used for all the purposes associated with managing the pension scheme. If you are asked to provide consent (to agree that another organisation can have access to your data, or for us to use especially sensitive information such as information about your health) then you have a right to withdraw that consent at any time. **However, if we do not hold all of the data required to administer your benefits, we may not be able to pay out the benefits you are (or may be) entitled to.**

If you are unhappy with the way your data has been used, or you believe your data protection rights have been infringed, you have the right to raise a complaint with us using the contact details below. We aim to resolve complaints as quickly as possible and within a reasonable timeframe, taking into account the nature and complexity of your complaint.

For data protection complaints, you can also complain to the Information Commissioner's office (ICO) using the following contact details: telephone 0303 123 1113 or via its website at https://ico.org.uk/make-a-complaint/data-protection-complaints/.

If any significant changes are made to the Scheme or any projects are carried out that require us to use your personal data we will explain in more detail why it is being used and whether you need to consent to that particular use of your data.

Contact details

Your benefits are not affected and you do not need to take any action as a result of receiving this communication. If however you have any questions, the Trustees can be contacted via:

Schneider Group of the ESPS C/o Broadstone Administration Unit 2 Rye Hill Office Park Birmingham Road Coventry CV5 9AB	Tel: 02476 422 842 Email: schneider@broadstone.com

This notice is subject to review and updating from time to time.

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