

ESSENTRA PENSION PLAN (THE "PLAN")

Personal information and what we do with it

As the Trustee of the Plan, we need personal information about you to run the Plan and pay benefits.

Similarly, other parties involved in running the Plan will sometimes need to make decisions jointly with the Trustees about how your personal information will be used for those purposes. These other parties (our **'Trustee Advisers'**) include our actuaries, Punter Southall Limited, including our individual Scheme Actuary, Craig Wootton and also Bridge Trustees Limited, as one of the trustee directors.

In legal terms, the Trustee and the Trustee Advisers are 'joint data controllers' in respect of this information. This means that we need to tell you some things about the personal information we have about you and what your rights are in relation to it.

In this notice, you will see information about what the Trustee does with your personal information, and also what the Trustee Advisers do with it. We describe who to contact if you wish to exercise your rights under data protection laws in relation to the joint use we make of your information.

Except where stated otherwise, 'we' means both the Trustee and the Trustee Advisers where they are acting as joint data controllers in relation to your personal information (as described above).

What personal information we have

We hold some or all of the following types of personal information about you:

- Your name, any evidence of name change, date of birth, gender, national insurance number, bank account information and lifetime allowance protections.
- Contact details (including your address, phone number and email address).
- If your benefits from the Plan derive from your employment, details of your employer when you were building up benefits in the Plan, how long you worked for them, employment dates and your salary from time to time, including PAYE details, contribution history, pension membership dates and contracting out dates.
- Whether you are married or in a civil partnership and other information we might need to pay any death benefits due in relation to you.
- If your benefits from the Plan form part of a divorce settlement, details of that settlement.

We may sometimes use other information about you. This could include information about your health where it is relevant to, for example, early payment of benefits from the Plan, or details about personal relationships to determine who should receive benefits on your death. We might also, very rarely, have information about criminal convictions and offences where it is relevant to your entitlements under the Plan.

Where we get personal information from

Some of the information we have comes directly from you. We may also get information (such as your salary and length of service) directly from your employer. In addition, Barnett Waddingham, who administer the Plan on our behalf, may have obtained information from you and passed it to us.

Sometimes we get information from other sources: for example, another pension scheme if you have transferred benefits from that scheme; government departments such as HMRC and DWP; the Company and publicly accessible sources (eg the electoral roll, agencies etc) if we have lost touch with you and we are trying to find you.

If we ask you for other information in the future (for example, about your health), we will explain whether you have a choice about providing it and the consequences for you if you do not do so.

Our legal basis for using your personal information, including how we share it

The Trustee must by law provide benefits in accordance with the Plan's governing documentation and must also meet other legal requirements in relation to the running of the Plan.

We will use your personal information to comply with these legal obligations, to establish and defend our legal rights, and to prevent and detect crimes such as fraud. We may need to share your personal information with other people for this reason, such as courts and law enforcement agencies.

We also have a legitimate interest in properly administering the Plan. This includes: paying benefits as they fall due; purchasing insurance contracts; communicating with you; and ensuring that correct levels of contributions are paid, benefits are correctly calculated and the expected standards of scheme governance are met (including standards set out in Pensions Regulator guidance).

In order to achieve this, we may share your personal information with various people, including: any new trustee directors; employers; the Plan administrator; the Plan actuary; our professional advisers; the Secretary to the Trustee; auditors; insurers; HMRC; the Pensions Ombudsman; and IT and data storage providers and other service providers. If your benefits are transferred to another Plan, we will also need to provide the administrators of that Plan with information about you.

When we need to use information about your health (or other very personal information), we may ask for your consent. However, sometimes there may be reasons of public interest or law which enable us to use this information without consent, and we will do so where that is necessary for us to run the Plan in a sensible way. You can withdraw your consent at any time by contacting us using the contact details given below. This may affect what we can do for you, unless we have another lawful reason for using your information.

We may also share your personal information with someone else where you have given your consent – for example, where you transfer your benefits out of the Plan.

How to contact the other people we give your personal information to

Some of the people we mention above just use your personal information in the way we tell them. However, others may make their own decisions about the way they use this information to perform their services or functions, or to comply with regulatory responsibilities as controllers in their own right. In this case, they are subject to the same legal obligations as us in relation to this information, and the rights you have in relation to your information apply to them too.

If you want any more information from any of these recipients or to exercise any rights in relation to the information they hold, please contact us and we will put you in touch with them.

How long we keep your personal information for

We need to keep some of your personal information long enough to make sure that we can satisfy our legal obligations in relation to the Plan and pay any benefits due to or in respect of you.

We keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the majority of the personal information that we hold will be kept for a period of 15 years from the end of the Plan year in which the last payment from the Plan is made to or in respect of you or, in respect of a transfer out, 50 years from the end of the Plan year in which the transfer out was made.

However, some information may be kept for a longer or shorter period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), and our legal obligations mentioned above.

Your rights in relation to your personal information

You have rights in relation to the personal information we have about you. You have the right to:

- make a request to have your personal information corrected if it is inaccurate, and completed if it is incomplete;
- in particular circumstances, restrict the processing of your information;
- in particular circumstances, ask to have your information erased;
- request access to your information and to obtain information about how we process it;
- in particular circumstances, move, copy or transfer your information;
- in particular circumstances, object to us processing your information;
- not be subject to automated decision-making including profiling where it produces legal or other significant effects on you.

You can exercise all of these rights free of charge except in some very limited circumstances, and we will explain these to you where they are relevant.

Our contact details for exercising these rights are set out below and we can supply more information about these rights to you on request.

Keeping your information safe

When we pass your information to a third party, we seek to ensure that they have appropriate security measures in place to keep your information safe and to comply with general principles in relation to data protection.

Some of the people we share your information with may process it overseas. This means that your personal information may on occasion be transferred outside the UK and the European Economic Area. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it.

You can contact us for more information about the safeguards we use to ensure that your personal information is adequately protected in these circumstances (including how to obtain copies of this information).

Queries and further information

If you want more information about what we do with your information and what your rights are, the Trustee can be contacted at:

**Jacky Perkins
Secretary to the Trustee
Essentra Pension Plan
C/o Avebury House
201 -249 Avebury Boulevard
Milton Keynes
MK9 1AU**

**Tel: 07507 388685
Email: jackyperkins@jardan-prs.co.uk**

In respect of our actuaries, Punter Southall Limited, including our individual Scheme Actuary, who, as we have said are classed as joint data controllers with the Trustee when providing certain actuarial and consulting services. Punter Southall Limited has an appointed Data Protection Officer tasked with ensuring its compliance with data protection legislation. Your point of contact for Punter Southall Limited or the Scheme Actuary is Punter Southall Limited's Data Protection Officer, whose address is 11 Strand, London WC2M 5HR.

If you have concerns about the way we handle your personal data, you can contact the Information Commissioner's Office or raise a complaint at www.ico.org.uk/concerns, or call its helpline on 0303 123 1113.