Privacy Notice from the Trustee of the BT (Lynx) Section of the Pensions Master Plan (the “Trustee”)

The Trustee needs to collect, use and maintain personal information about you in order to run the BT (Lynx) Section of the Pensions Master Plan (the “Scheme”) and pay benefits. When it does so, the Trustee is regulated under the UK General Data Protection Regulation (the UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025 (the "DUA Act").

The Trustee is responsible as "controller" of your personal data. In legal terms, the Trustee and the Scheme Actuary, Andrew Oatridge of Isio Group Limited, are both independently ‘data controllers’ and, whilst the Trustee is required to tell you some things about the personal information it has about you, how we use it and what your rights are in relation to it, any other Data Controllers are required to issue their own Privacy Statement under applicable data protection legislation which is available on their website. Accordingly references in this document to ‘we’ or ‘us’ are to the Trustee only.

In this Privacy Notice, when we refer to the “employer”, we are referring to British Telecommunications plc or the company you worked for at the time you were accruing benefits in the Scheme and its predecessor.

Collection of your information

Generally, Personal Data is any information relating to an identified or identifiable individual. We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, home address, telephone numbers, email addresses, marital status, details of your spouse/civil partner, national insurance number, and country of residence;

- information relating to your employment and benefits, including your employment history, salary information, service history, member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, pensionable service information relating to you, your earnings, the history, category and value of contributions and benefits that you receive, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders, tax protections or other adjustments;

- financial details, such as bank account details and tax information;

- records of our communications with you, including any complaints; and

- in some cases, special categories of personal data may be held about you, which carry additional safeguarding requirements under data protection legislation. Examples include information concerning your health or relevant medical information in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you); information about your race or ethnicity, religious beliefs, or sexual orientation for monitoring purposes; information regarding Trade Union membership, where relevant to managing your benefits and knowing who represents your interests.

Where applicable, we also collect information about your nominated beneficiaries, dependants or next of kin. Before providing us with any such information, you should provide a copy of the information in this notice to those individuals.

In some cases, the above information may also be collected from other sources:

- The employer;
- Members of the Scheme (e.g, if you are a nominated beneficiary on that Member’s death), people acting on your behalf or tracing services;

- Isio Pensions Limited (company number 09447994), the current third-party administrator for the Scheme;
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP;
- People acting on your behalf;
- Tracing Services or publicly accessible sources (e.g. the electoral roll) 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.

How we use your information

We use your information for the following purposes:

a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, dealing with complaints, and making disclosures at your request such as in relation to transfers to other schemes;

b) for general administration of the Scheme, including: to record and pay benefits; for actuarial valuations and calculations; for reviews we or our administrators conduct for statistical and reference purposes; in connection with any corporate activity a Scheme employer may be engaged in; and for other checks or administrative activities that may become necessary from time to time (like member tracing should we happen to lose contact with you) or to prevent fraud;

c) for meeting our on-going regulatory, legal and compliance obligations, and investigating or preventing crime;

d) to improve our processes and our use of technology, including testing and upgrading of systems, and to learn about other processes we can use to improve the administration of the Scheme; and

e) when we undertake or agree to activities from time to time to help us to determine and manage Scheme investments and risks, manage the liabilities of the Scheme, such as longevity modelling and hedging, insurance, bulk transfers, pension increase exchanges and transfer value exercises, and buy-in and buy-out transactions, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advice providers to allow you to obtain financial advice.

Our use of your information as described above is permitted by applicable data protection law, including the UK GDPR, the Data Protection Act 2018 and the DUA Act, because it is:

(i) required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;

(ii) necessary for establishing, exercising or defending legal claims or where the processing relates to personal data manifestly in the public domain;

(iii) in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or direct us on benefit payments or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent;

(iv) necessary for our legitimate interests: in pursuing the purposes set out in (a) to (e) above; in establishing, exercising or defending legal claims; and (when we make the disclosures to your employer for the audit and corporate transaction purposes referred to below) necessary for their legitimate interests, such interests in each case not being overridden by your privacy interests; and

(v) necessary for your legitimate interests in having your benefits administered correctly.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data, we may be unable to record, calculate or pay your or your beneficiaries' benefits.

Where we hold special categories of personal data, we will explain to you at the time why we need it and how the information will be used. We will only process special categories of personal data where we need to do so to establish a right to a benefit. In any other circumstances where we need to process special categories of personal data, we will seek your prior consent.

Where we are carrying out processing on the basis if your consent, you have the right to withdraw that consent at any time by contacting us on the details provided. Any withdrawal of consent will not impact the lawfulness of the processing which took place prior to such withdrawal.

We will seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to the information we collect for the purposes for which we collect and process it.

Disclosures of your information

The Trustee may share your information with the following recipients:

- our suppliers, including your employer and other providers of services to us and them, such as administrators, Banks and Deposit takers, financial advisors (to provide you with financial advice), payroll providers (to record and pay benefits), the Scheme actuary (for actuarial calculations), and printing, communication, IT and hosting, marketing, and tracing providers;

- Deloitte Legal – for the provision of legal advice, where required;

- your employer for audit purposes or in relation to corporate transactions initiated by them;

- insurance and reinsurance companies, such as when we carry out the activities referred to above, specifically your data may be shared with Standard Life (operating under Phoenix Life Limited) and The Prudential Insurance Company of America and any of their related service providers due to the investments that the Plan currently holds to enable those entities to perform their obligations under the transaction and reinsurance documents that the Trustee has with them. You can find their privacy notices at https://www.standardlife.co.uk/privacy and https://prudential.scene7.com/is/content/prudential/PICALRTPrivacyNotice ;

- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and

- other persons from time to time when the disclosure is needed to exercise or protect legal rights, including the Trustee's own and those of other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.

This data sharing enables us to administer the Scheme in a compliant manner and ensure that our duties as trustees are discharged lawfully. Any such data sharing will be carried out in accordance with applicable data protection legislation, including the UK GDPR and the DUA Act, and will be subject to appropriate data sharing arrangements.

Isio Pensions Limited, who provide actuarial and administration services to the Scheme, maintains its own privacy notice, which can be viewed here: https://www.isio.com/privacy

We will not share your personal information with any other third party. All third-party service providers are required to protect your personal information in line with our policies and we only permit them access to your personal data in relation to the specified purposes and in accordance with our instructions.

Transfers of your information abroad

The use and disclosure of your information, including for the purposes referred to in (a) to (e) above, may involve transferring your information outside of the United Kingdom. In those cases, except where the relevant country has been determined by the Secretary of State to ensure an adequate level of data protection, we require (through a binding agreement) that the recipients comply with appropriate measures designed to ensure that the transferred information is protected, for example by a data transfer agreement in the appropriate standard form approved for this purpose by the relevant authority in the United Kingdom. Further details of these transfers including copies of any data transfer agreements we use are available from us on request.

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

Retention of your information

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To do this, we will keep your information for the longer of the period required in order to meet our legal or regulatory responsibilities, and the period envisaged within our retention management policy documentation. We determine the period envisaged within such documentation with regard to the Scheme's operational and legal requirements, such as facilitating the payment of benefits to you or your nominated beneficiaries, calculating and managing the liabilities of the Scheme, and responding to legal claims or regulatory requests.

Please note we may continue to hold personal data that we collected through our role as the Trustee of the Scheme, even if we are no longer the Trustee. Information about our approach in this situation to data security as a firm can be found at https://www.pantrustees.co.uk/Scheme-GDPR/.

Your rights

You have rights under data protection law of fair processing and transparency over how we use your personal data. You have a right of access to your personal data (this is known as a Subject Access Request or "SAR"). When responding to a SAR, we will make reasonable and proportionate searches for information held about you, in line with the requirements of the DUA Act. You also have a right to rectification or erasure of your personal data and to restrict its processing, and (in some circumstances) to require certain of your information to be transferred to you or a third party. Where you request it, you may receive the personal information we hold about you, and this must be provided in a clear, and understandable manner. You may transfer this information to a third party in certain situations.

You also have rights under data protection law to object to the processing of your information on grounds which we have said are necessary for our legitimate interests (see above), or for marketing purposes (see above).You may object to decisions being taken by automated means which produce legal affects concerning or significantly affecting you.

If you have any questions or wish to exercise any of the above rights, you can contact us as detailed below.

You also have the right to withdraw your consent to the use of your information, to the extent such use is based on your consent, but this may affect the operation of our service over your benefits and such objection cannot work retrospectively (e.g.: in relation to data already processed).

Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

Keeping your Personal Data Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised manner. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will only do so in an authorised manner and are held to a duty of confidentiality.

We have procedures in place to deal with suspected or actual security breaches. In such unfortunate circumstances we will notify you, and any applicable regulator of the security breach where we are legally required to do so and within applicable time limits.

If you want detailed information from “Get Safe Online” (which is supported by HM Government and leading businesses) on how to seek to protect your information and your computers and devices against fraud, identity theft, viruses or other online problems please visit getsafeonline.org.

How to raise a concern about the use of your data

If you are unhappy with the way in which your personal data has been collected, used, stored, shared or deleted, or if you believe that we have failed to comply with your data subject rights, you should in the first instance raise your concern with the Trustee using the Scheme's Data Complaints Procedure (the "Data Complaints Procedure"). A copy of the Data Complaints Procedure is available on request from the contact details set out at the end of this notice. Where you require assistance in making a data complaint (for example, due to disability, language needs, or other vulnerabilities), reasonable adjustments will be made to facilitate your access to the Procedure.

The Trustee will acknowledge receipt of all data complaints within 30 days following the day of receipt. The Trustee will then investigate your complaint and keep you informed of progress and the outcome. The Trustee is committed to handling personal data responsibly and in full compliance with applicable data protection legislation, including the DUA Act, the UK GDPR, and the Data Protection Act 2018. If you are not satisfied with the outcome of the Scheme's data complaints process, or if the Trustee has failed to respond within the applicable timescale, you have the right to lodge a data complaint with the Information Commissioner's Office (ICO) under Article 77 of the UK GDPR. The ICO's contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Website: www.ico.org.uk | Telephone: 0303 123 1113.

Status of this privacy notice

This privacy notice was updated in May 2026 to reflect, among other things, the Data (Use and Access) Act 2025. The Trustee keeps its data protection practices under review to ensure continuing compliance as the law develops. This notice is non-contractual. We reserve the right to amend it from time to time, but will notify you where we do this. Further privacy notices will be made available to read on the website **members.pensionpal.co.uk/BTlynxMasterPlan** and no further hard copy notices will be sent to you.

Issued on behalf of

The Trustee of the BT (Lynx) Section of the Pensions Master Plan

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