

Privacy Notice

Currie Motors Retirement Benefits Plan (“the Scheme”) is established by an interim Trust deed on 21 March 1978 and is governed by a definitive Trust Deed and Rules dated 11 July 1984.

For the purposes of the EU General Data Protection Regulation ('**GDPR**') and legislation implementing GDPR in the UK, the Trustee is a data controller. In this Privacy Notice the terms "we", "us" and "our" refer to the Trustee.

We are sending this Privacy Notice to you as a member or beneficiary of the Scheme. We take your privacy seriously, and we are committed to protecting it. This Privacy Notice explains how we will use any personal information that we collect from you or that is provided to us by you or a third party in connection with your membership of the Scheme. Please read this Privacy Notice carefully.

From time to time we may make changes to this Privacy Notice. We will inform you of any such changes.

Information we collect about you

You, and the Company in its capacity as principal employer of the Scheme, have provided us, and may in future provide us, with information relating to your employment with the Company and your membership of the Scheme.

We hold the following information:

- personal details such as your name, date of birth, email and postal address, national insurance number, and, if relevant, details about any ill-health you have suffered or are suffering;
- family details such as whether you are married or in a civil partnership, and details about your children, dependants and other family members;
- employment details such as the pensionable pay you received while in employment, any bonuses you received, and your length of service;
- if you have already started receiving your pension we will hold information such as your bank account details.

We may sometimes use other information about you. For example, we might also, very rarely, have information about criminal convictions and offences, but only where it is relevant to the payment of Scheme benefits.

How we use your information

We use your information to ensure the effective, efficient and accurate management of the Scheme in accordance with the Scheme rules and the law. This includes using your information to enable us to calculate and pay the correct pension benefits during your lifetime and on your death. We may use your information to enable us to communicate with you.

In order to use your personal information we must have a legitimate reason for doing so. Mostly, the reason that we have for using your information is to enable us to carry out the role of trustee of the Scheme (known as 'legitimate interest'). Without using your information, we could not operate the Scheme effectively. In some situations, however, we are required by law to use your information, and in limited

circumstances we can only use your information where we have your consent to do so. If your consent is needed, and has not already been obtained, we will not use your information until we have sought and obtained your agreement.

Where we get personal information from

Some of the information we have comes directly from you. In addition, Mercer, who administers the Scheme on our behalf, may have obtained information from you and passed it to us.

Sometimes we get information from other sources: for example, from your Scheme employer (for information such as your salary and length of service); from another pension arrangement if you have transferred benefits from that pension arrangement; from government departments such as HMRC and DWP; and from publicly accessible sources (eg the electoral roll) if we have lost touch with you and 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.

Who we share your information with

We will not sell your personal information and we will not transfer it outside of the EEA without appropriate safeguards in place. We will only share your personal data with selected recipients and only where it is necessary to do so for the purposes mentioned above in relation to how we use your information. As at the date of this Privacy Notice, we share your information with the following persons for the following reasons:

- The Scheme's Actuary, currently Rebecca Floud. Information is also shared with her employer, Mercer. The Scheme's Actuary and Mercer are classed as data controllers in their own right when providing certain actuarial and related services. For more information on how Mercer as the Scheme's actuarial adviser use your data, please contact them. Their contact details can be found at: www.uk.mercer.com
- Mercer to enable it to provide administration, pension payroll and other consultancy services to the Scheme. Further information can be found at www.uk.mercer.com
- Cartwright provide investment and consultancy services to the Scheme. Further information can be found at: www.cartwright.co.uk
- The Scheme auditor, currently Haines Watt, to enable it to complete the audit of the Scheme's Annual Report and Accounts. More information can be found at: www.hwca.com
- Squires Patton Boggs to provide legal advice to the Scheme. More information can be found at: www.squirepattonboggs.com

We may also seek to share your data with insurance companies for the purposes of securing benefits where appropriate, and your data would be shared on an anonymised data wherever possible. Whenever we share your information with a third party, that party is required to enter into a binding agreement that they will use your information only for the purposes for which it is provided, and that they will not pass it on to any other person.

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

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 Scheme.

The Company may also have a legitimate interest in contacting you about your benefits under the Scheme, and any additional options which may be available to you in relation to those benefits. In such circumstances, we may share your personal information with the employers so that they can contact you for that purpose.

Keeping your information secure

The security of your personal information is important to us. We will take all steps reasonably necessary to ensure that your personal information is kept safe and secure in accordance with GDPR. We will take appropriate measures to protect your personal information against loss, theft, and unauthorised use.

At present data is not transferred outside the EEA but if in the future any of the advisers or the Company do transfer personal data appropriate safeguards will be put in place.

How long we will keep your information

Pension benefits build up and are paid over a long period. We will therefore need to retain your details until at least 6 years after the final benefits are paid in respect of you. If a spouse's or dependant's pension is payable on your death, this may mean that we keep your personal information for some time even after you have died.

We will not keep information longer than it is needed. Once your information is no longer needed, we will take reasonable steps to securely destroy it.

Your rights regarding your information

Under GDPR you have rights in relation to your personal information.

You have the right to access information that we hold about you, and to obtain certain information about how we use your information and who we share it with. In some situations we may be exempted from providing this information, for example if doing so would reveal personal information about another person.

You have the right to have any errors in the information held about you corrected. If you wish to request a correction, please explain in detail why you believe the personal information we hold is inaccurate or incomplete.

You also have certain additional rights, for example to have your personal information permanently deleted, to request that we stop processing your personal information, and to request that we transfer your personal information to another party. If the reason why we are able to process your personal information is because you have given consent for us to do so, you may withdraw that consent at any time.

If you would like to exercise any of these rights, please contact us using the contact details at the end of this Privacy Notice. Please note that we will need to verify your identity before we can respond to your request.

Complaints

You also have a right to make a complaint about how we use your personal information. Please contact us in the first instance and we will do our best to resolve the matter to your satisfaction.

This does not affect your legal right to complain to the Information Commissioner's Office, which is the UK data protection supervisory authority. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113).

Contact us

If you have any questions, comments or requests regarding this Privacy Notice or use of your personal information, please get in touch.

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June 2021