

THE DUNLOP SLAZENGER PENSION SCHEME (“the Scheme”)

Privacy Notice from the Scheme Trustee

The Trustee of the Scheme (currently PAN Trustees UK LLP), the Scheme Actuary (Paul Greenall FIA, Isio Group Limited) and our actuarial advisers (Isio Group Limited) need personal information about you in order to run the Scheme and pay benefits.

In legal terms, the Trustee is the ‘data controller’ of the personal information collected and used by the Scheme.

In addition, the Scheme Actuary and our actuarial advisers act as a joint data controller for the personal data that they use. This privacy notice also covers these joint data controllers.

We are required to tell you some things about the personal information we have about you, how we use it and what your rights are in relation to it.

Collection of your information

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, national insurance number, bank account details (in some cases), and country of residence;
- information relating to your benefits, including your member identifying number (which is assigned to you by the Scheme), the date you joined or left the Scheme, your earnings, the 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;
- records of our communications with you, including any complaints; and
- in some cases, special categories of personal data such as information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or similar reasons determine the benefits paid to you).

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:

- Your current or past employer(s);
- The third party administrator for the Scheme (currently Isio Group Limited);
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP; and
- Publicly accessible sources (e.g. the electoral roll) and data tracing agencies if the Trustee has lost touch with you and is trying to find you.

If the Trustee asks 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; 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 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;
- e) when we undertake or agree to activities from time to time to help us manage the liabilities of the Scheme, such as longevity modelling and hedging, insurance, bulk transfers, pension increase exchanges and transfer value exercises, including (where relevant) disclosures to administrators for calculating offers made to you in relation to these activities and disclosures to advise providers to allow you to obtain financial advice; and
- f) in addition to the processing detailed above, we will also process, disclose or provide your information to the extent required by us according to the Pension Schemes Act 2021 and Pensions Dashboards Regulations 2022. This may involve the provision of information to a qualifying pensions dashboard service or to integrated service providers (ISPs). Your pensions information is shared with third parties to the extent that it is necessary to do so for us to comply with legal obligations to which we are subject, in this instance, in order for us to comply with the various obligations on us in relation to the pensions dashboard service.

Our use of your information as described above is permitted by applicable data protection law because it is:

- (i) required to meet our legal obligations 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 (f) 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.

The Scheme Actuary and Isio Group Limited also hold and use some of your personal data. The lawful reason they hold this data is because they have a legitimate interest in providing actuarial advice and valuations for us. For example, the Scheme Actuary carries out calculations to advise us whether the Scheme has enough money to pay the future benefits promised to its members.

Our Lawful Basis for Processing

We therefore process your personal data on the legal basis that the processing is necessary:

- for the performance of the contract of employment between you and your employer regarding your participation in the Scheme,
- to comply with our legal obligations, and
- for our legitimate interests as the Trustee of the Scheme to effectively operate, administer and audit the Scheme; prevent fraud; keep our records up to date and any other legitimate interests that we may identify, provided always that your interests and fundamental rights do not override those interests.

We process special categories of data, namely your health data, to perform our obligations under employment law and the law relating to social protection. In addition, and in most cases, we shall request your explicit consent in order to process your health data. Where we do so, we process your data on the basis of that consent.

Please note that if you do not provide us with the personal data that we specify is required for administration of the Scheme then we may not be able to administer the benefits provided by it. Likewise, where we or third parties are processing your personal data on the basis of your consent, then you are entitled to withdraw your consent. If you do withdraw your consent, we may be unable to administer your pension, which may result in you and/or your spouse and dependants not receiving the pension and benefits provided by the Scheme.

We may process your personal data for a purpose other than that for which we originally collected it where the new purpose is compatible with the old purpose or we have your specific consent for the new purpose. If the new purpose is unrelated to the original purpose, then we will notify you in writing and explain the legal basis allowing us to continue processing your personal data.

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, 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 and our actuarial advisers (for actuarial calculations), and printing, communication, IT and hosting, marketing, and tracing providers (and when information is shared with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- 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 in (e) above;
- pensions dashboards (for further information about pensions dashboards, please refer to the Money & Pensions Service website (<https://maps.org.uk/en/our-work/pensions>));
- The Pensions Protection Fund, public authorities, regulators or government bodies and law enforcement organisations (including the courts, the Pensions Regulator, the Pensions Ombudsman, and HMRC), 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.

Pensions dashboards

The Trustee may process your personal data in order to meet its legal obligations relating to pensions dashboards. This includes advance processing to prepare for the introduction of pensions dashboards and connecting the Scheme to the pensions dashboards system, as well as ongoing processing once pensions dashboards are made available to the public.

A pensions dashboard is an online tool which will enable individuals to view basic information about their pension savings from multiple pension schemes (excluding pensions already in payment). If an individual submits a request for information via a pensions dashboard, the data within that request will be matched against the personal data that we hold. If we can confirm that the request has been made by a member of the Scheme, and that member's pension has not yet started to be paid, then information about the pension may be made available to the member via the pensions dashboard. If we are uncertain whether the individual is entitled to a pension from the Scheme then we may carry out further data processing to verify whether such an entitlement exists. For further information about pensions dashboards, please refer to the Pensions Dashboards Programme website (<https://www.pensionsdashboardsprogramme.org.uk>).

Transfers of your information abroad

The Trustee may transfer, store or process the personal information it collects about you to or in a country outside the UK.

Whenever the Trustee transfers your personal data out of the UK, the Trustee ensures a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we use specific transfer mechanisms approved for use in the UK which give personal data the same protection it has in the UK. The transfer mechanism may include using (i) binding corporate rules, (ii) the UK international data transfer agreement or (iii) the UK addendum to the EU standard contractual clauses.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Retention of your information

The Trustee will only retain personal data for as long as necessary to fulfil the purpose for which it was collected (identified above and detailed further in the Schedule) or to comply with legal, regulatory or internal policy requirements. To do this, the Trustee will keep your information for the longer of the period required in order to meet its legal or regulatory responsibilities, and for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the Scheme (subject to retaining your personal data for such longer period as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Scheme).

To determine the appropriate retention period for personal data, the Trustee considers the amount, nature and sensitivity of the personal data, the potential harm from unauthorised use or disclosure of your personal data, the purpose for which the Trustee processes your personal data and whether the Trustee can achieve those purposes through other means, the Scheme's operational and applicable legal, tax, accounting or other 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, the Scheme's Independent Trustee (PAN Trustees UK LLP ("PAN")) may continue to hold personal data collected through its role as a Trustee even when it is no longer a Trustee of the Scheme. Information about PAN's approach in this situation to data security as a firm can be found at <https://www.pantrustees.co.uk/Scheme-GDPR/>.

Data security

The Trustee has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, the Trustee limits access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on the Trustee's instructions and they are subject to a duty of confidentiality.

The Trustee has put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where the Trustee is legally required to do so.

Your rights

You have rights under data protection law of access to and rectification or (in certain circumstances) **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.

You also have rights under data protection law to object to the processing of your information on grounds which the Trustee has said are necessary for its legitimate interests (in which case, we must carry out an exercise balancing our legitimate interests with your rights and freedoms as a data subject (if you disagree with the outcome of that balancing exercise you have the right to refer the matter to the Information Commissioner (or the Information Commission, if it has taken over the functions of the Information Commissioner)), or for marketing purposes (see above).

If you have any questions or wish to exercise any of the above rights, you can contact the Trustee 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.

With effect from 19 June 2026, you have the right to **make a complaint to us** (using the Trustee's contact details below) if you consider that, in connection with your personal data, there is an infringement of data protection legislation.

You can also lodge a complaint about the Trustee's processing of your personal information with the office of the Information Commissioner (www.ico.org.uk; tel: 0303 123 1113) (or the Information Commission, if it has taken over the functions of the Information Commissioner) if you consider that, in connection with your personal data, there is an infringement of data protection legislation. You can do this via the Information Commissioner's website or telephone helpline (referred to above).

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. The Trustee will notify you when your information is required for this purpose. If you do not provide the information we request, withdraw your consent to the processing of your personal data (if your consent is required), or ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits, (including the payment of benefits from the Scheme) or consider your applications or complaints concerning the Scheme. In some cases, it could mean the Trustee is unable to put your pension into payment or has to stop your pension (if already in payment).

Keep us informed

It is important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership of the Scheme so that we can continue to pay your benefits when due, and contact you about your membership of the Scheme. In particular, please let us know if you move home, so that we can stay in touch with you.

Status of this privacy notice

This privacy notice was updated in June 2026. It is non-contractual. We reserve the right to amend it from time to time but will notify you where we do this.

Issued on behalf of

The Trustee of the Dunlop Slazenger Pension Scheme**Contact details:**

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