

THE HELLMANN INTERNATIONAL FORWARDERS PENSION SCHEME (“the Scheme”)

Privacy Notice from the Scheme Trustee

The Trustee (PAN Trustees UK LLP) needs personal information about you in order to run the Scheme and pay benefits.

In legal terms the Trustee is the ‘data controller’ and is required to tell you some things about the personal information it has about you, how it is used and what your rights are in relation to it.

Collection of your information

The Trustee collects and processes 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 employer;
- Deloitte Total Reward and Benefits Limited, the third party administrator for the Scheme;
- Other schemes (if you have transferred benefits from them);
- Government departments such as HMRC and DWP;
- Publicly accessible sources (e.g. the electoral roll) if we have lost touch with you and we are 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 the Trustee uses your information

The Trustee uses 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;
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- 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 the Trustee 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 the Trustee undertakes or agrees to activities from time to time to help it 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 advice providers to allow you to obtain financial advice.

The Trustee's use of your information as described above is permitted by applicable data protection law because it is:

- (i) required to meet its legal or regulatory responsibilities, including when the Trustee makes 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 the Trustee to make disclosures or direct it on benefit payments or where the Scheme Rules require you to provide information which we cannot otherwise process without your consent;
- (iv) necessary for the Trustee's legitimate interests: in pursuing the purposes set out in (a) to (e) above; in establishing, exercising or defending legal claims; and (when the Trustee makes 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 the Trustee collects from you is needed to meet its legal or regulatory obligations or to calculate or pay benefits to you or your nominated beneficiaries, if the Trustee cannot collect this personal data it may be unable to record, calculate or pay your or your beneficiaries' benefits.

Disclosures of your information

The Trustee may share your information with the following recipients:

- its suppliers, including your employer and other providers of services to it 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 (and when information is shared with these recipients the Trustee takes steps to ensure they meet its data security standards, so that your personal data remains secure);
 - your employer for audit purposes or in relation to corporate transactions initiated by them;
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- insurance and reinsurance companies, such as when the Trustee carries out the activities referred to in (e) above;
- 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
- others 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.

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 the Trustee if you want further information on the specific mechanism used by it 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 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 the period envisaged within its retention management policy documentation.

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.

Details of retention periods for different aspects of your personal data are available in the Trustee retention policy which you can request by contacting the Trustee.

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 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 (see above), 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.

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).

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.

Status of this privacy notice

This privacy notice was updated in March 2023. It is non-contractual. The Trustee reserves the right to amend it from time to time, but will notify you where it does this.

Issued on behalf of

The Trustee of The Hellmann International Forwarders Pension Scheme

Contact details:

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Nottingham
NG1 6EE

March 2023
