

Jardine Motors Group UK Pension Scheme (“the Scheme”)

Privacy Notice – April 2024

The Trustee needs personal information about you in order to run the Scheme and pay benefits.

In legal terms we are ‘data controllers’ and 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.

Please note, the Scheme's Independent Trustee Director (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 Director 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/>

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.

We will not share your personal data with third parties for marketing purposes.

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

- Jardine Motors Group;
- PWC who provide Consulting services to the Scheme
- Mercer, who provide Actuarial services to the Scheme
- Aptia UK Limited, the current third party administrator for the Scheme;
- Other schemes (if you have transferred benefits from them);
- Government departments such as HM Revenue & Customs (HMRC) and the Department for Work and Pensions (DWP);
- 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) then 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 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 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.

Our use of your information as described above is permitted by applicable data protection law 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 Jardine Motors Group 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.

Disclosures of your information

The Trustee may share your information with the following recipients:

- **our suppliers**, including Jardine Motors Group 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 (and when we share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure);
- **Jardine Motors Group** for audit purposes or in relation to corporate transactions initiated by them or where necessary for our legitimate interests in pursuing the purpose set out in (e) above;
- **insurance and reinsurance companies**, such as when we carry 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 our 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.
- At regular intervals, **an actuary** works out what the liabilities of the Scheme are worth and the assets and contributions that are required to meet them. To do this, the actuary needs information to work out what benefits are likely to be paid by the Scheme, and when. This means that the actuary needs the personal data the Trustee holds. However, they do not always need names and addresses to carry out their analysis and so, where possible, information is supplied to them on an anonymised basis.

We may require the services of an actuarial firm at other times where necessary to help us work out if we can reasonably agree to proposals from the employer and other strategic issues, or to determine the cost of particular benefits. This may also require the processing of Member and Beneficiary data.

The Scheme Actuary is a controller of personal data in their own right. The Scheme Actuary's privacy notice is available on request. The contact details at the foot of this notice can be used for this purpose.

Transfers of your information abroad

We permit our processors to transfer personal data outside of the EEA. The Trustee will require any Processor who transfers personal data outside the EEA to put in place appropriate safeguards (*) before doing so, such as use of model clause agreements that have been approved by relevant regulators.

(*) Including but not restricted to –

- not transferring personal data outside of the EEA until appropriate checks have been made; and
- ensuring administrators have processes in place to consider data protection whenever a Scheme member or beneficiary requests an overseas transfer.

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, which will be for the life of the Scheme plus 15 years.

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.

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 we have said are necessary for our 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 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.

You can also lodge a complaint about our 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. We will notify you when your information is required for this purpose.

Status of this privacy notice

This privacy notice was updated in April 2024. It is non-contractual.

We reserve the right to amend it from time to time, but will notify you where we do this.

The Trustee of the Jardine Motors Group UK Pension Scheme

Contact details:

Trustee of the Jardine Motors Group UK Pension Scheme
C/o Aptia UK Limited
Post handling Centre, Maclaren House, Talbot Road, Stretford, Manchester, M32 0FP