

PRIVACY NOTICE FOR THE HARTWELLS PENSION PLAN (1971)
(the “Plan”)

The Trustees hold and process personal data about Plan members and beneficiaries in order to run the Plan. In doing so, we need to comply with relevant data protection legislation.

As you may be aware the Trustees of the Plan are currently Christopher Webb, Anthony Goddard, Craig Gibbin, Kevin Godfrey and Vidett Trust Corporation Limited.

What we do with your data

As a data controller, the Trustees collect and process your personal data for the purposes of complying with their legal duties to administer the Plan, which include: the calculation, administration and payment of benefits under the Plan before or after your death, processing ill-health retirement claims, carrying out actuarial valuations, or dealing with any queries or complaints regarding benefit entitlements. The legal basis for doing so is in order for the Trustees to comply with their legal obligations, and other legitimate interests, such as the efficient management of the Plan. The Trustees also process personal data for other legitimate purposes relating to the operation of the Plan, for example this could include de-risking exercises or purchasing insurance policies in respect of member’s benefits.

Whilst much of the data we hold has been provided by members themselves, we also hold and process data provided by the Plan’s Principal Employer, Hartwell plc, and other Plan participating employers: Hartwell Finance Ltd, and Ebbon-Dacs Ltd (together the “**Companies**”), as well as former participating employers. We also hold and process data provided from: other pension schemes from which members have transferred, HMRC, the DWP, regulatory bodies and tracing organisations. We also receive information from members about their proposed beneficiaries, who may be eligible to receive benefits on the member's death (that information includes the full name, title, and address of potential beneficiaries). We assume that you have the consent of those individuals to provide us with this information and that you will share this privacy notice with them. We will not provide a copy of this notice to those individuals as to do so is likely to seriously impair our ability to properly pay the benefits due under the Plan

The data we hold is to assist the Trustees in calculating and paying the benefits the members of the Plan are entitled to and this may include your name, address, salary, gender, date of birth, years of service with the Plan/ Companies, date of birth, NI number, passport numbers, contact details (including telephone number, mobile number and/or email address), details of any pension sharing orders made on divorce, financial information, such as bank account details, and pension entitlement, marital status and marriage certificate details, employment/ retirement status, death certificate details, and start date and leave date of membership with the Plan.

We also hold some special categories or “sensitive” data about individuals for the purposes of administering the Plan (for example in relation to ill-health or death benefits). We will in most circumstances process this data in the performance of our legal obligations in connection with employment, social security and social protection (as allowed by legislation). We may also, typically when considering claims under the Plan’s Internal Dispute Resolution Procedure, process any sensitive data for the purposes of establishing, exercising or defending legal claims. If there are any occasions where we seek your explicit consent to process sensitive data then you can withdraw it at any time.

Who else processes your data?

We share your personal data with certain third parties involved in running the Plan, for example, : MUFG Retirement Solutions Pension Administration (HS) Limited. (“MUFG”), as the Plan’s Administrator, David Gardiner of Aon Solutions Limited as he is currently the Plan’s Actuary, CMS as the Trustees’ legal advisers, the Secretary to the Trustees, the Plan’s Auditors, insurance companies and reinsurance companies additional voluntary contribution providers, the Trustees’ consultant, tracing organisations, printing companies, storage companies and disposal companies the Trustees’ bank account providers, and other regulatory bodies, , for example, HMRC, the Pensions Ombudsman, the Pensions Regulator and the Pensions Advisory Service. We may also share your data with the Companies’ adviser, Isio, where the Trustees and the Companies are working on joint Plan projects and where Isio is appointed as a Trustee adviser. We may share personal information with providers of pensions dashboards services (including the Money and Pensions Service, the Pensions Dashboards Programme, dashboards providers themselves, and any service providers appointed by us or by the Schemes' administrators) to facilitate your ability to access information regarding your benefits under the Scheme via pensions dashboards. Your personal data is also shared with

In some circumstances we are joint controllers with third parties such as the Plan Actuary, the Trustees’ legal advisers (who may process your data to comply with their professional duties as advisers to the Trustees) and the Companies. The Companies hold your data to comply with their legal obligations as the sponsoring employers of the Plan. The Companies have a legitimate interest in the Plan being run efficiently and may have an interest in offering certain options to members The Trustees may share information with the Companies, and their auditors and other third party advisers for this purpose.

The Companies, MUFG and other advisers may from time to time transfer data to other countries, including outside the European Economic Area. Where such transfers are made, the parties involved will ensure adequate safeguards are in place. If we (or our service providers) process personal data outside of the UK and the EEA, we will take appropriate measures to ensure that your personal data is adequately protected in a manner that is consistent with this privacy notice, and in accordance with applicable laws. Those measures include entering into European Commission approved standard contractual arrangements with them.

Storage of your personal data

Pension benefits are paid over a long period and your right to benefits under the Plan is based on information which may go back many years. The Trustees will retain information relating to you whilst you are a member and we will store this information for as long as we need it.

Once your membership ends, we may decide to delete some of the data held in relation to you after 6 years. However, information may be held for longer where we consider it appropriate, which may include in order to ensure the Plan pays the correct benefits and to deal with any queries relating to your benefits (or those of your dependants) which may arise after that time.

MUFG will hold your personal data as the Plan administrator for so long as they are the Trustees’ appointed data processor, and may continue to hold on to your personal data after the expiry of their contract with the Trustees in order to defend any subsequent legal claims.

Your rights

You have the right to access your personal data and, require that we rectify any errors in the data that we hold, or request that we erase your personal data. In some circumstances you can also require that we restrict the way we process your personal data, object to its processing or request a copy of your personal data for the purposes of transmitting elsewhere. The Trustees are obliged to permit portability in circumstances where they have obtained consent or they are relying on a contractual obligation only. You can exercise your rights by contacting the Plan’s Administrator on:

Email: Hartwells@rs.mpms.mufg.com Telephone: 0151 448 5576.

Where we have requested and obtained your consent to process particular information, you may withdraw that consent at any time. However if we do not hold all the data we need to administer your benefits, we may not be able to pay out the benefits you are entitled to.

Contact details

If you have a question about how the Plan uses your data, the contact details for the Trustees and for the other data controllers involved in running the Plan are:

The Trustees of the Hartwells Pension Plan (1971)
care of : MUFG Retirement Solutions Pension Administration (HS) Limited
PO Box 9810
Bournemouth
BH1 9PF

Telephone: 0151 448 5576

Email: Hartwells@rs.mpms.mufg.com

What if you have a complaint?

If you have any concerns about how we use your personal data, you may raise a complaint with us using the contact details set out above. We will investigate and respond in accordance with our complaints handling process.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters at www.ico.org.uk

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone number: 0303 123 1113 or 01625 545 745

The Trustees reserve the right to amend this privacy notice from time to time.

David Gardinerr of Aon Solutions Limited ("Aon") is the current Plan Actuary and as such is a joint data controller with the Trustees. Aon have prepared their own privacy notice and this is provided below.

Aon Solutions UK Limited “QUICK READ” PRIVACY NOTICE

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary - together "Aon") has been appointed to provide pensions advisory and calculation services that relate to your membership of the pension scheme. In doing so Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal information to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon's use of your personal information is set out in our full Privacy Notice. We recommend that you review this notice which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>, or you can request a copy by contacting us, including reference to the scheme name, at: Data Protection Officer, Aon Solutions UK Limited (Wealth Solutions UK), PO Box 730, Redhill, RH1 9FH