

Personal Data Privacy Statement

The UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 are laws which protect individuals' personal information.

The Trustee of the DHL Group Retirement Plan (the data controller who decides why and how the data is used) holds certain personal data about you, our Plan members and, where we need to, your dependants and beneficiaries. Personal data is information that uniquely identifies you.

The Trustee is committed to respecting your rights under data protection laws and we are providing this notice to help you understand how we collect and use your information. We take the privacy of your personal information very seriously.

How we use this personal information

The Trustee has a legitimate interest in holding and processing information about you in order to properly administer the Plan and to calculate and pay your benefits. The Trustee also holds and processes this information:

- to comply with its obligations under the Trust Deed and Rules of the Plan and government legislation, and
- to the extent required to comply with our duties in relation to individuals using pensions dashboards. This includes "matching", where we use personal data that a user has provided to search our records to check whether that user is a member of the Plan, and where we collect further personal data from that user in the event of a "possible match".

Your personal data is held on paper and on computer systems (for example, the Trustee may hold electronic copies of your ID documentation and/or other documentation containing your personal data).

The Trustee or Towers Watson Limited (WTW) as the Plan's administrators may use your personal information, including your email address, to contact you directly in order to provide relevant information or to deal with your queries.

The Trustee also processes your personal data to allow you to access the Plan website. It may also process your personal data as a result of online ID verification, sanction and credit checks (such checks are only 'soft credit checks' and will not affect your credit record).

The Media Content (defined below) may be used by the Trustee as part of its communications, including posters, banners, emails, videos and presentations for the Plan and on the Plan website ("Specific Media Purposes").

Information we hold about you

We aim only to collect and hold the information about you which is necessary for the running of the Plan. This will include information we have collected in the past as well as new information we obtain. The types of personal information we may collect and hold could include, for example:

- your name and postal address
- date of birth
- gender
- marital status
- telephone number
- National Insurance number
- financial information including salary information relevant to your benefits in the Plan
- bank account details

- email address
- login and password details to log into the Plan's website and website usage data*
- details about your pension benefits
- medical and other details about your health
- if you choose to use an online identity verification service, data that allows us to match images of your face to your chosen ID documents (biometric data)
- if you have used a pensions dashboard, an online platform where you can access information about all of your pension benefits, a "pensions identifier", which is a string of characters used to identify your specific benefits under the Plan

**this personal data is processed by WTW in its capacity as controller. Please see WTW's own privacy notice on the Plan's website.*

and other necessary information collected on joining the Plan or during your membership. Information is generally collected from you or your employer, but may also be collected from other sources if relevant, including, for example, other pension schemes and pension providers, medical practitioners, other advisers with whom the Trustee communicates in relation to the administration of the Plan, HMRC and third parties who provide information about you as part of online ID verification, sanction and credit checks. For certain members who have provided their explicit consent, we may also hold photographs, film, audio or other recordings of such members ("Media Content"). We may also collect and hold details about your family members, dependants or potential beneficiaries (including their names and possibly details of their gender and relationship status) - where you have provided us with such information, please ensure that those individuals are aware of the information contained within this statement.

Some of the data that you disclose to the Trustee may be sensitive data. For example, you may disclose information relating to your health or sexual orientation to allow the Trustee to pay certain benefits. You may also provide us with biometric data for the purposes of verifying your identification online. Except where the law allows it, we are usually required to obtain your consent to collect and hold this type of sensitive data or to pass it to a third party.

Who we share your personal information with

We are not allowed to disclose personal data about you to other parties except:

- When required for contractual or legal reasons or other specifically identified purposes; or
- Where you have given your consent.

However, as the Trustee needs help from various entities to properly administer the Plan, your information may be disclosed for processing to:

- WTW as the Plan's administrator
- The Secretariat team (who are employed by DHL GBS (UK) Limited), and any employer that participates in the Plan (e.g. the HR and Payroll departments)
- The Plan's professional advisers, including the actuary*, auditor, medical advisers, investment adviser, lawyers and other third parties who assist with the day-to-day administration of the Plan, such as annuity broking services, tracing agencies and providers of online ID verification, sanction and credit checking services
- The advisers and printers who help us prepare various communications we send to you, such as benefit statements
- Auditors or contractors or other advisers auditing any of our business processes
- Banks and other payment systems

- Regulators and Government bodies (including HMRC and the Pensions Regulator – the Trustee can be fined and subject to other action if it fails to provide information to these authorities)
- Providers of pension scam identification services, which the Trustee or WTW may choose to instruct in relation to a member’s request to transfer their pension benefits from the Plan to another arrangement.
- Insurance companies for the purposes of life insurance, additional voluntary contributions and investing DC section contributions
- Insurance companies** and other organisations for the purposes of liability and risk management exercises.
- Third parties that form part of the “dashboard ecosystem” that enables pensions dashboards services to work, as well as the Plan’s Integrated Service Provider (ISP), which provides a service allowing pensions information from the Plan to be connected to the dashboard ecosystem.

Some of these entities may transfer data to other countries, including countries outside the United Kingdom (for example, WTW carries out certain administration activities (which include the processing of personal data) in India and the Philippines; and transfers to the Metropolitan Life Insurance Company in the USA may take place in relation to longevity insurance arrangements. Unless the country to which the data is to be transferred ensures an adequate level of protection for personal information (as assessed by the UK authorities), we (or the relevant entity) will put in place safeguards in line with the recommendations of data protection legislation. These include the EU Commission’s standard contractual clauses or, where relevant, the UK international data transfer agreement. You can find a copy of the UK international data transfer agreement [here](#).

As we need help from various providers to fulfil the Specific Media Purposes, the Media Content will be shared with those providers. When we use the Media Content for the Specific Media Purposes described above, we expect to share it with other current and potential Plan members and beneficiaries of the Plan. Members of the general public in the UK and abroad may also view the Media Content.

*WTW and their scheme actuaries will act as a data controller when they provide scheme actuarial services to the Trustee. Their privacy notice is available at www.willistowerswatson.com/personal-data.

**Zurich Assurance Ltd and Metropolitan Tower Life Insurance Company will act as data controllers of personal data of certain members/beneficiaries of the Plan in order to provide insurance services to the Trustee. More information about how these companies process personal data and your rights in respect of that processing can be found on Zurich Assurance Ltd’s privacy notice which is available at www.zurich.co.uk/en/services/privacy/fair-processing-notice#longevity and Metropolitan Tower Life Insurance Company’s privacy notice which is available at www.metlife.com/about-us/privacy-policy/customer-privacy-policy/.

How long we keep your personal information

We must keep all personal information safe and only hold it as long as is necessary. To comply with the law we must keep certain personal data for a minimum of 6 years. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to pensions dashboards, we will comply with that restriction. But, given the nature of pension schemes, the Trustee’s current retention policy is that personal information will be retained for as long as members and other beneficiaries are entitled or may become entitled to benefits under the Plan. In addition, due to the nature of pension schemes, some personal information may need to be held for up to 15 years after the termination of the Plan. We will retain your personal data comprising the Media Content for as long as necessary to fulfil the Specific Media Purposes.

However, we do review what personal data we are holding in relation to the Plan, and how long we need to hold it, in accordance with our data retention policies. In particular, in the limited circumstances that biometric data may be collected for identity verification purposes, our expectation is that it will be appropriate for it to be destroyed immediately after use.

Your rights to your personal information

Part of our role in keeping your information safe is to let you know about your rights in relation to your information. You can write to us at any time to obtain a copy of your information and to have any inaccuracies corrected. Where appropriate, you may have your personal information erased, rectified, transferred, amended or completed, and/or you may object to processing or ask for the processing to be restricted; and where you have given your consent to us processing your data, you can withdraw that consent.

You should be aware that taking any of the above steps could impact on the payment of your benefits, your participation in the Plan, and/or our ability to answer questions relating to your benefits.

Please also note that the Trustee can take steps to override a member's request to object to processing, to withdraw consent or to delete personal data, if this will impact the payment of your benefits. Information will generally be provided to you free of charge, but we may charge a small fee to cover the administration costs involved in providing you with a copy of your information.

If you wish to exercise your rights in relation to your information, or want more information on the content of this statement, please submit a written application to DHL Pensions, Sunderland, SR43 4JU. If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office whose helpline number is: 0303 123 1113.

Updates to this notice

This notice is up-to-date as at February 2026. You can view the most up-to-date version of the Trustee's privacy notice at any time on the member website at <https://experience200.ehr.com/dhlpensions/Home/News-and-help/Documents-and-resources#privacynotice>.

Alternatively, if you would prefer to receive a hard copy of the notice, please contact PensionSecretariat@dhl.com.