

Massey Ferguson Works Pension Scheme

DATA PRIVACY STATEMENT

Trustee's commitment to your privacy

Massey Ferguson Works Pension Trust Limited (the '**Trustee**' or '**we**' or '**us**') as Trustee of the Massey Ferguson Works Pension Scheme (the '**Scheme**'), is committed to protecting the privacy and security of your personal data. This Privacy Statement ('**Statement**') gives you information about how the Trustee will collect and use your personal data in relation to your membership of the Scheme. Personal data is information, or a combination of pieces of information, that could reasonably allow you, or another living individual, to be identified.

The Trustee is the data controller in respect of the personal data they collect about you for the purposes of the UK General Data Protection Regulation ('**GDPR**')

Information the Trustee may collect from you

The Trustee may collect and process the following types of personal data which you provide to them in connection with the Scheme:

- your name
- your date of birth
- your gender
- your marital status
- your bank account details
- your National Insurance number
- the length of your employment with your Employer
- details of your dependants
- your contact details
- any other information you provide directly to us in connection with the Scheme.

In certain circumstances, we may also collect, hold and use personal data of a sensitive nature. This special category of personal data is known as '**Sensitive Personal Data**', which includes information about your health, which we will ask you to provide in order to assess any application you make for an incapacity pension.

Information the Trustee may collect about you from the Employer or third parties

In addition, we may collect personal data about you from AGCO Limited (the '**Employer**'). This may include:

- your National Insurance number
- your bank account details, payroll records and tax status information
- information relating to your employment with the Employer, including your service dates, salary, contributions and benefits, to the extent relevant to your benefits under the Scheme.

Periodically, we may also collect personal data relating to you from other third parties such as former employers, other pension schemes from which we accept transfer payments and regulatory authorities such as HM Revenue & Customs. Personal data collected from third parties include your tax status information and information relating to your guaranteed minimum pensions (if any) under the Scheme.

The purpose and legal basis for processing your information

The purposes for which we may process personal data, and the legal basis on which we may perform such processing, are:

Processing purpose	Types of personal data	Legal basis for processing
<p>Administering the Scheme in accordance with its Trust Deed and Rules and applicable law.</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us. <p>Information provided by the Employer and third parties:</p> <ul style="list-style-type: none"> • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us. 	<p>We have a legitimate interest in administering the Scheme in accordance with its Trust Deed and Rules and applicable law.</p>
<p>Determining your eligibility to receive benefits under the Scheme.</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> • name • date of birth • gender • marital status • National Insurance number • length of employment • details of dependants • other relevant information provided to us. <p>Information provided by the Employer and third parties:</p> <ul style="list-style-type: none"> • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits. • other relevant information provided to us. 	<p>We have a legitimate interest in determining whether you are eligible for benefits under the Scheme.</p>

<p>Determining the benefits payable to and in respect of you and making correct payments on time to the correct recipient.</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us. <p>Information provided by the Employer and third parties:</p> <ul style="list-style-type: none"> • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us. 	<p>We have a legitimate interest in paying the correct benefits on time to the correct recipient in accordance with the Trust Deed and Rules.</p>
<p>Communicating with you in relation to the Scheme and your benefits.</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us. <p>Information provided by the Employer and third parties:</p> <ul style="list-style-type: none"> • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us. 	<p>We have a legitimate interest in communicating with you in relation to the Scheme and your benefits.</p>

<p>Establishing, exercising and defending our legal rights.</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us. <p>Information provided by the Employer and third parties:</p> <ul style="list-style-type: none"> • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us. 	<p>We have a legitimate interest in establishing, exercising and defending our legal rights.</p>
<p>For audit, compliance, controls and other risk management.</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us. <p>Information provided by the Employer and third parties:</p> <ul style="list-style-type: none"> • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us. 	<p>We have a legitimate interest in auditing the Scheme and ensuring that it is managed properly.</p>

<p>Identifying issues with the way we administer the Scheme; planning improvements and making necessary changes.</p>	<p>Information provided by you:</p> <ul style="list-style-type: none"> • name • date of birth • gender • marital status • bank account details • National Insurance number • length of employment • details of dependants • contact details • other relevant information provided to us. <p>Information provided by the Employer and third parties:</p> <ul style="list-style-type: none"> • National Insurance number • payroll records and tax status information • information relating to your employment, salary, contributions and benefits • other relevant information provided to us. 	<p>We have a legitimate interest in identifying issues with the way we administer the Fund so that it is administered properly.</p>
<p>Considering any potential beneficiaries of death benefits under the Scheme.</p>	<p>Personal data of potential beneficiaries:</p> <ul style="list-style-type: none"> • name • date of birth • marital status • contact details • other relevant information provided to us. 	<p>We have a legitimate interest in selecting beneficiaries of your death benefits under the Scheme.</p>

We may also process Sensitive Personal Data for the following purposes and under the following legal bases:

Processing purpose	Types of Sensitive Personal Data	Legal basis and special condition for processing
<p>Considering your eligibility to benefits early on grounds of ill-health.</p>	<ul style="list-style-type: none"> • health information. 	<p>We have obtained your explicit consent to process your health data.</p>

Disclosure of personal data

In the course of administering the Scheme, the Trustee may share your personal data with the following categories of recipients:

- administrators who are responsible for the day-to-day administration of the Scheme and who provide secretarial services to ensure the smooth running of the Scheme for its members (currently, this is WTW, formerly Willis Towers Watson)
- our appointed insurance companies in connection with the management of additional voluntary contribution funds
- communication consultants and printers, who help us to prepare various communications we send to you
- tracing agencies and consultants who assist with updating Scheme data or providing statistical information
- financial services providers who facilitate pension payments
- archive storage providers who help us store and destroy documents securely.

The Trustee may disclose your personal data to these categories of recipient in connection with services provided by them to the Trustee. These service providers are required to take appropriate security measures to protect your personal data in line with our policies. The Trustee does not allow service providers to use your personal data for their own purposes. The Trustee only permits them to process your personal data for specified purposes and in accordance with the Trustee's instructions.

We may also disclose the personal data to the following categories of recipient who are controllers and will be directly responsible under data protection law for protecting the personal data:

- the Employer
- the Scheme Actuary and the actuarial adviser for the purpose of providing scheme actuarial services to the Trustee (currently, this is Aon)
- the Trustee's legal adviser for the purpose of providing legal advice to the Trustee (currently, this is Mayer Brown International LLP)
- the Trustee's auditor for the purpose of providing audit services to the Trustee (currently, this is KPMG LLP)
- other professional advisers providing services to the Trustee
- the Pensions Regulator, the Pensions Ombudsman and HM Revenue & Customs if we are under a duty to disclose or share your personal data in order to comply with any legal obligation
- other parties where relevant or required, for example payment providers.

In addition, where we make Scheme investments or seek to secure benefits for Scheme members in other ways, such as through purchasing insurance or entering pension scheme mergers, then we may need to share personal data with investment providers, insurers and other pension scheme operators. In each case we will only do this to the extent that we consider the information is reasonably required for these purposes.

Aon Hewitt Limited, our actuarial adviser, has provided a brief description on how they use your personal data in order to support the Trustee in the running of the Scheme. This is attached in the Appendix to the letter.

More detail about Mayer Brown's use of your personal data is set out in their Privacy Notice (www.mayerbrown.com/en/legal-notices/overview/privacy-notice). You can request a copy by contacting Mayer Brown directly at: Data Protection Officer, Mayer Brown International LLP, 201 Bishopsgate, London EC2M 3AF.

The list of recipients is not exhaustive, and the Trustee may, from time to time, need to share personal data with other categories of recipient in order to administer the Scheme and pay benefits, for example, if the Trustee engages a different service provider. The Trustee will update this Statement if the categories of recipient change.

International transfers of personal data

The personal data that the Trustee processes about you may be transferred to one or more countries outside the UK, which has not yet been deemed by the UK Government to offer adequate data protection. This includes circumstances where your personal data is processed by staff operating outside the UK who work for our service providers; for example, WTW, our administrator, performs certain benefit administration tasks in India and the USA. In such cases, we will ensure an adequate level of data protection in the country of the recipient as required under the GDPR. This may involve requiring the recipient to enter into a data transfer agreement incorporating UK Government-approved standard contractual clauses as an appropriate safeguard for the transfer. If you wish to obtain a summary of these safeguards, please contact the Trustee at the address on the next page.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means. In the event that this position changes, we will notify you in writing.

Retention of personal data

We will only retain your personal data and the personal data of your dependants for as long as may be necessary to fulfil the purposes described in this Statement, including for the purposes of satisfying any legal, accounting, or reporting requirements. Inevitably, this means that we may keep personal data for long periods of time, including after benefits have ceased to be payable to you and your dependants.

To determine the appropriate retention period for your personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data and whether we can achieve the purpose of the processing through other means. Our retention of your personal data, and the criteria we apply to determine how long it is necessary for us to retain your personal data, is kept under review.

Your rights under the UK General Data Protection Regulation (GDPR)

In certain circumstances, under the GDPR, you will have the right to:

- Request access to your personal data. This right always applies. However, there are some exemptions which mean you may not always receive all your personal data that we process.
- Request rectification of your personal data if it is inaccurate or incomplete. This right always applies.
- Request deletion of your personal data in certain circumstances if there is no legitimate reason for its continued processing.
- Restrict the processing of your personal data in certain circumstances (for example, if you want the Trustee to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data where we rely on a legitimate interest as a legal basis for processing your personal data (unless we have compelling legitimate grounds for the processing).
- Request the transfer of your personal data which you have given to us to another party. This right only applies where we rely on your consent to process your personal data.
- Withdraw your consent to processing at any time, in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose. Once the Trustee has received notification that you have

withdrawn your consent, it will no longer process your information for the purpose or purposes you originally agreed to, unless it has another legitimate basis for doing so in law. Please note that the withdrawal of your consent will not affect the lawfulness of any processing of personal data based on your consent before its withdrawal.

If you want to access, rectify or request deletion of your personal data, object to the processing of your personal data, request that we transfer a copy of your personal data to another party, or withdraw your consent to processing (if applicable), please contact the Trustee in writing at the address given below.

Updates to this Statement

The Trustee reserves the right to update this Statement and any other relevant policies or procedures at any time. Any substantial changes that we may make to this Statement in the future will be provided to you in a Trustee communication. The Trustee may also notify you in other ways from time to time about the processing of your personal data.

Contact

If you have any questions concerning this Statement or the policies or procedures referred to above, please contact the Trustee at:

Massey Ferguson Works Pension Scheme
Abbey Park
Stoneleigh
Kenilworth CV8 2TQ
For the attention of the Pensions Manager

If you are dissatisfied with any aspect of the Trustee handling of your personal data, you also have a right to lodge a complaint with the Information Commissioner's Office (ico.org.uk).

Last updated: 11 April 2024

APPENDIX

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 advisers 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 www.aon.com/unitedkingdom/retirement-investment/retirement-investment-services-privacy-statement.jsp, or you can request a copy by writing or emailing us, including reference to the scheme name: Data Protection Officer, Aon Solutions UK Limited (Wealth Solutions UK), PO Box 730, Redhill RH1 9FH

Email: RI.UK.PrivacyChampions@aon.com