

## **PRIVACY NOTICE**

### **for the Belden (UK) Pension Plan (the “Plan”)**

This notice is for members and beneficiaries of the Plan. It has been prepared by PAN Trustees UK LLP (“PAN”) acting as the trustee of the Plan (“Trustee”, or “we”).

#### **Why we are providing this notice to you**

As the Trustee we hold certain information about you (“personal data”). We are required by law to give you specified information about the personal data we hold about you, how we use it, and the safeguards that are in place to protect it. This notice is designed to give you that information.

#### **Why we hold your personal data**

The Trustee processes personal data about you, in its role as controller, for the proper handling of all matters relating to the Plan, including its administration and management, calculating, securing and paying benefits and managing liabilities in relation to it. Further information about how we process this data is provided under the heading “*How we will use your personal data*” below.

The legal basis for our use of your personal data will generally be one or more of the following:

- a) We need to process your personal data to satisfy our legal obligations as Trustee
- b) We need to process your personal data for the legitimate interests of: administering and managing the Plan and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustee has in relation to the Plan
- c) The processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract

#### **What personal data we hold and how we obtain it**

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address
- Identifying details, including gender, date of birth, national insurance number and employee and membership numbers
- Information that is used to calculate and assess eligibility for benefits, for example length of service and salary information
- Financial information relevant to the calculation or payment of benefits, for example bank account and tax details
- Information about your family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death
- Information about your health, for example, to assess eligibility for benefits payable on ill health, or when your health is relevant to a claim for benefits following the death of a member of the Plan
- Information about a criminal conviction if this has resulted in you owing money to your employer and the employer may be reimbursed from your benefits

We obtain some of this personal data directly from you. We may also obtain data from your current or past employer(s) or companies that succeeded them in business (for example salary information), from a member of the Plan (where you are or could be a beneficiary of the

Plan as a consequence of that person's membership), and from a variety of other sources including public databases, our advisers, and government or regulatory bodies.

Where we obtain information concerning certain "special categories" of particularly sensitive data, such as health information, extra protections apply under the data protection legislation. We will only process your personal data falling within one of the special categories with your consent, unless we can lawfully process this data for another reason permitted by that legislation. You have the right to withdraw your consent to the processing at any time by notifying the Trustee in writing. However, if you do not give consent, or subsequently withdraw it, the Trustee may not be able to process the relevant information to make decisions based on it, including decisions regarding the payment of your benefits.

Where you have provided us with personal data about other individuals, such as family members, dependants or potential beneficiaries under the Plan, please ensure that those individuals are aware of the information contained within this notice.

### **How we will use your personal data**

We may use this data to deal with all matters relating to the Plan, including its administration and management. This can include the processing of your personal data for all or any of the following purposes:

- to contact you
- to assess eligibility for, calculate and provide you (and, if you are a member of the Plan, your beneficiaries upon your death) with benefits
- to identify your potential benefit options and, where relevant, implement those options
- to allow alternative ways of delivering your benefits, for example, through the use of insurance products and transfers to or mergers with other pension arrangements
- to comply with our legal and regulatory obligations as Trustee
- to respond to queries from you and others that may receive benefits as a consequence of your membership, and to address any actual or potential disputes concerning the Plan
- the management of the Plan's liabilities, including the entering into of insurance arrangements and selection of Plan investments
- for statistical and financial modelling and reference purposes
- in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Plan and their group companies

### **Organisations that we may share your personal data with**

From time to time we will share your personal data with our advisers and service providers so that they can help us carry out our duties, rights and discretions in relation to the Plan. These include the following:

- The Plan's administrator, currently WTW. Their privacy policy can be found on their website: <https://www.wtwco.com/en-GB>.
- The legal advisers to the Trustee, currently Burges Salmon. Their privacy policy can be found on their website: <https://www.burges-salmon.com/>.
- The Plan's actuary, currently Ross Bland, WTW.
- Actuarial consultants, currently WTW.
- The Plan's auditors, currently Crowe. Their privacy policy can be found on their website: <https://www.crowe.com/uk>.
- Investment advisers, currently WTW.

- Additional voluntary contribution provider, currently ReAssure. Their privacy policy can be found on their website: <https://www.reassure.co.uk/>.
- Tracing bureaus for mortality screening and locating members and beneficiaries, currently LexisNexis. Their privacy policy can be found on their website: <https://risk.lexisnexis.co.uk/>.
- The Trustee's insurers, currently Unum. Their privacy policy can be found on their website: <https://www.unum.co.uk/>.
- The Plan's bank, currently HSBC. Their privacy policy can be found on their website: <https://www.hsbc.co.uk/>.
- Suppliers of IT, document production and distribution services.

In some instances advisers and service providers will be controllers in their own right and will be directly responsible to you for their use of your personal data. They may be obliged under the data protection legislation to provide you with additional information regarding the personal data that they hold about you and how and why they process that data. Further information may be provided to you in a separate notice or may be obtained from the advisers and service providers direct, for example, via their websites.

We may also provide some of your data to the Plan's sponsoring employers and group companies of those employers, their advisers and potential purchasers of their businesses.

In addition, where we make investments or seek to provide benefits for Plan members in other ways, such as through the use of insurance or pension scheme mergers, then we may need to share personal data with providers of investments, 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.

The advisers, service providers and organisations referred to in the paragraphs above may use personal data to perform their functions as well as for statistical and financial modelling (such as calculating expected average benefit costs and mortality rates) and planning, business administration and regulatory purposes. They may also pass the data to other third parties (for example, insurers may pass personal data to other insurance companies for the purpose of obtaining reinsurance), to the extent they consider the information is reasonably required for a legitimate purpose.

Where requested or if we consider that it is reasonably required, we may also provide your personal data to government bodies and dispute resolution and law enforcement organisations, including the courts, the Pensions Regulator, the Pensions Ombudsman, the Pension Protection Fund and His Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their functions.

In some cases recipients of your personal data may be outside the UK. This means your personal data may be transferred outside the European Economic Area (EEA) to a jurisdiction that may not offer an equivalent level of protection as is required by EEA countries. If this occurs, appropriate safeguards must be implemented with a view to protecting your data in accordance with applicable laws. Please contact the Trustee, using the contact details below, if you want information about the safeguards that are currently in place.

### **How long we keep your personal data**

We will only keep your personal data for as long as we need to in order to fulfil the purposes identified above. In practice this means that we will retain your data for such period as you (or any beneficiary who receives benefits after your death) are entitled to benefits from the

Plan and for so long afterwards as may be required to deal with any questions, complaints or claims that we may receive about our administration of the Plan. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

Please note, PAN may continue to hold personal data collected through its role as a trustee of the Plan even when it is no longer a trustee of the Plan. 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/>

## **Your rights**

You have a right to access and obtain a copy of the personal data that the Trustee holds about you, and to ask the Trustee to correct your personal data if there are any errors or it is out of date or incomplete. In certain circumstances you have the right to object to the processing of your personal data; for example you have the right to object to processing of your personal data which is based on the legitimate interests identified in the section above headed "*Why we hold your personal data*", or where the processing is for direct marketing purposes. In some cases you may also have a right to ask the Trustee to erase or restrict the processing of your personal data or to transfer your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk) or via its telephone helpline (0303 123 1113).

If you wish to exercise any of these rights or have any queries or concerns regarding the processing of your personal data, please contact the Trustee using the contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustee's processing activities with the Information Commissioner's Office, you can do this via the ICO's website or telephone helpline.

As explained in the section above headed "*How we will use your personal data*", one of the one of the reasons we collect and hold your personal data is to administer your Plan benefits. If you do not provide the information we request, or ask that the personal data we already hold is deleted or that the processing of the personal data be restricted, this may affect our ability to administer your benefits, including the payment of benefits from the Plan. In some cases it could mean the Trustee is unable to put your pension into payment or have to stop your pension (if already in payment).

## **Updates**

We may update this notice periodically. Where we do this we will inform you of the changes and the date on which the changes take effect.

## **Contacting us**

Please contact the Trustee for further information using the postal address below or by sending an email for the attention of the Trustee to [beldenpensions@wtwco.com](mailto:beldenpensions@wtwco.com).

The Trustee of the Belden (UK) Pension Plan  
c/o WTW  
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