

THE PILKINGTON SUPERANNUATION SCHEME (THE "SCHEME")

PILKINGTON BROTHERS SUPERANNUATION TRUSTEE LIMITED (THE "TRUSTEE")

PRIVACY NOTICE – PERSONAL INFORMATION ABOUT OUR MEMBERS AND THEIR POTENTIAL BENEFICIARIES

As Trustee of the Scheme we need to collect and use personal information about our members and potential beneficiaries. This privacy notice sets out how we collect, use and protect your personal information and your rights in relation to your information.

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified.

1. PERSONAL INFORMATION WE USE

We hold or will collect personal information about you from a variety of sources, including information from you directly, information provided by the Scheme's employers and information we get from other sources, including public databases.

1.1 What information may we collect directly from you?

The categories of personal information that we collect directly from you include:

- (a) personal details (e.g. your name, date of birth, marital status, dependents data);
- (b) your bank details and national insurance number;
- (c) your contact details (for example, your address, phone number and email address);
- (d) details about your health;
- (e) details about who you would like us to consider paying benefits to when you die; and
- (f) AVC investment choices

1.2 What information may we collect from other sources (such as your employer)?

These are examples of categories of information we may collect from other sources:

- (a) personal details (for example, your name, date of birth);
- (b) your contact details (for example, your address, phone number and email address);
- (c) information necessary to calculate and pay your contributions or benefits (for example, your employment history and salary, previous employer, NI contributions);
- (d) information from HMRC (for example your tax code); and
- (e) (for ill health cases) sickness records, medical evidence.

1.3 How will we use your personal information and why?

The ways we use your information include:

- (a) identifying you and your survivors and making sure your details are up to date;
- (b) communicating with you;

- (c) calculating and paying your benefits and deducting appropriate tax;
- (d) making trustee decisions – such as whether to agree to incapacity retirement or how to distribute benefits after your death;
- (e) paying AVC contributions to the provider and
- (f) calculating the liabilities of the Scheme.

We must have a legal reason to use your personal information. This will usually be one of the following:

- (a) to fulfil our legal obligations (including any contractual obligations), which includes making sure that your benefits are paid correctly;
- (b) to meet our legitimate interests to administer the Scheme efficiently;
- (c) because using the information is necessary in relation to a legal claim; and
- (d) because, in limited circumstances, the Trustee may need to use the information for certain recognised legitimate interests under Article 6(1)(ea) UK GDPR, including safeguarding vulnerable individuals or children (for example, where a beneficiary may be at risk of financial abuse, exploitation or undue influence), preventing or investigating crime or fraud (such as suspected pension scams or identity fraud), responding to emergency situations, or sharing information with public authorities or other organisations exercising public functions where permitted by law.

The Trustee may also process special category personal data (such as information about your health) where this is necessary for the purposes of carrying out its obligations and exercising its rights in connection with employment and social security law, including the administration of pension benefits, in accordance with Article 9(2)(b) UK GDPR and Schedule 1 of the Data Protection Act 2018. In a few cases, especially where you have given us information about your health, we need your consent to process your data. Where this applies, you may take back your consent at any time by contacting the Scheme Secretary using the details below. Withdrawal of consent will not affect the lawfulness of processing carried out before withdrawal.

The provision of certain personal data is required by law or under the terms of the Scheme. If you do not provide this information, it may not be possible to administer your benefits or make payments to you.

2. **INFORMATION SHARING**

2.1 We may share personal information with:

- (a) the Scheme's administrators and our advisers (such as the Scheme Actuary) and their sub-contractors to facilitate the administration of the Scheme and your benefits;
- (b) His Majesty's Revenue and Customs (HMRC) and other Government organisations, including potentially the Pensions Regulator and the Pension Protection Fund;
- (c) the Pensions Dashboards, and connection framework, to comply with the legal obligation to connect to Pensions Dashboards to provide active and deferred members with details of their Scheme benefits

(d) insurance companies or other occupational pension schemes and their advisers with a view to securing benefits through long term insurance policies or a merger of schemes.

2.2 We may also provide some of your personal information to Pilkington group companies to help them to make decisions relevant to their role as sponsoring employers and to allow them to account for pension liabilities properly. We will only do so to the extent we consider necessary for these purposes.

2.3 We may also provide some of your personal information to the Pilkington Family Trust and other individuals or representatives who provide support services specifically linked to your Pilkington Pensioner status. We will only do so to the extent we consider necessary and/or in your wider interest.

3. **SECURITY AND STORAGE**

We have in place measures to protect the security of your personal information and keep it confidential. We review these measures regularly to make sure they remain appropriate.

When sharing your personal information with our administrators or another third party we will make sure that they also have measures in place to protect it and keep it confidential and agree to use the personal information only for the purposes we set out.

We will keep your personal information for as long as we have a relationship with you or your survivors. When deciding how long to keep your personal information after our relationship with you has ended, we will take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

4. **YOUR RIGHTS**

You have rights regarding your personal information, including the right in certain circumstances to access, correct, delete, restrict the processing of, or transfer your personal information or to restrict or object to our use of it. We may need extra information from you to deal with any request. If you would like to discuss or exercise these rights, please contact us.

You have the right to complain to the Trustee regarding the use of your personal information. Such complaints should be acknowledged within 30 days of receipt and a response provided without undue delay.

If you believe that the Trustee has not resolved your concerns, you can complain to the Information Commissioner's Office at www.ico.org.uk

5. **INTERNATIONAL DATA TRANSFER**

Your personal information may be transferred to, stored, and processed in a country that is not regarded as ensuring an adequate level of protection for personal information under UK law. Where your personal information is to be transferred outside the UK (for example by the administrator) we will make sure that there are appropriate safeguards in accordance with applicable legal requirements to protect the information. These safeguards may include:

(a) UK adequacy regulations; or

- (b) the International Data Transfer Agreement (IDTA) or UK Addendum to the EU Standard Contractual Clauses.

For more information on any safeguards in place, please contact us.

6. **CHANGES TO THIS POLICY**

We may update this privacy notice from time to time. You will be able to see when we last updated the notice because we will include a revision date. Updates are effective from the date on which they are posted on the Scheme's website.

7. **HOW TO CONTACT US**

- 7.1 The Trustee is the "data controller" responsible for the collection and use of your personal information. If you have questions or concerns please contact the Scheme Secretary at:

Pilkington Group Pensions Dept
NSG European Technical Centre
Hall Lane
Lathom Nr Ormskirk
Lancashire
L40 5UF.

- 7.2 We encourage you to let us know if your personal information changes or if you think the information we hold about you is out of date.

8. **THE SCHEME'S ACTUARY**

The Scheme's Actuary Aon Solutions UK Limited (Aon) will also be a "data controller" responsible for the processing of your personal information. You can find a privacy notice from Aon at: [Aon UK Limited Privacy Notice](#).

9. **PENSION INSURANCE CORPORATION (PIC) - THE SCHEME'S BUY IN PROVIDER**

The Scheme's buy-in insurance provider Pension Insurance Corporation plc (PIC) will also be a "data controller" responsible for the processing of your personal information. You can find a privacy notice from PIC at: <https://www.pensioncorporation.com/privacy-policy-buy-in>

10. **LEGAL AND GENERAL ASSURANCE SOCIETY LIMITED – PROVIDER OF INSURANCE AGAINST LONGEVITY RISK**

Legal and General Assurance Society Limited (LGAS) will also be a "data controller" responsible for the processing of your personal information. You can find a privacy notice from LGAS at: [Legal & General | Pension Risk Transfer | Privacy policy \(legalandgeneral.com\)](#).

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