



LGC Staff Pension Scheme Member Privacy Notice

LGC is committed to protecting the privacy and security of your Personal Data.

This Member Privacy Notice describes how we, the directors of LGC Scheme Pension Trustee Limited, and our affiliates and related entities (collectively, "LGC"), collect, retain and process Personal Data about you during and after your employment, with specific regard to your membership of the defined benefit pension scheme (the LGC Staff Pension Scheme). This Member Privacy Notice applies to all LGC deferred and pensioner members. We are issuing this Privacy Notice in our capacity as trustee of the pension scheme, as we are a "Data Controller" in respect of the Personal Data we hold about you.

This Member Privacy Notice applies to the handling of Personal Data when such data is processed or used with the help of data processing systems (computers) or non-automated manual handling processes such as hardcopy documents and filing systems.

For these purposes:

- **Personal Data** means any information that relates to you (the Data Subject) as an identifiable living individual (or data subject) – typical examples are given below but would include name and address details and; excludes anonymous or de-identified data that is not associated with a particular individual;
- **Collection** means how LGC acquires your Personal Data; and
- **Processing** means the storage retention, use, accessing, correction, transfer and deletion of Personal Data, whether by automated electronic means (on computer) or in a structured paper filing system.

This Privacy Notice describes the categories of Personal Data that LGC collects, how we use your Personal Data, how we secure your Personal Data, when we may disclose your Personal Data to third parties, and at what stage and how we may transfer your Personal Data outside of the European Economic Area (EEA). This Privacy Notice also describes your rights regarding the Personal Data that we hold about you and how you can access, correct, and request deletion of your Personal Data.

Collection of Personal Data

Your Personal Data held by us comprises data which we have collected from you directly, as well as data that has been passed to us by third parties such as LGC as your current or former employer. To carry out activities and obligations as an employer/former employer with responsibility for administering the pension scheme, the following categories of Personal Data may be collected, stored and processed by us:

- personal contact details such as title, name, address(es), telephone numbers and personal email addresses;
- work contact details such as work address, work telephone number and work email address;
- date of birth;
- gender;
- marital and dependent status;
- beneficiary (and emergency contact) information;
- government identification numbers such as social insurance or other national insurance number or other identification card number;
- bank account details and payroll information;
- salary (and benefit) information;

- compensation history;
- start date, job title and work schedule (including periods of part time work);
- location of employment;
- time and attendance information (including sickness absence and periods of unpaid leave);
- health/medical information;
- maternity information; and/or
- other personal details that you voluntarily provide.

Use of Personal Data

We only process your Personal Data where applicable law permits or requires it – for instance, on the basis of your consent or in order to comply with our legal obligation to administer the pension scheme - and only for the purposes for which it is collected. We may process your Personal Data for the following purposes:

- member administration (including payroll and benefits administration);
- business management and planning;
- accounting and auditing; and/or
- complying with applicable law.

If it is necessary to process your Personal Data for an unrelated purpose, we will provide notice to you and, if required by law, seek your consent. We may process your Personal Data without your knowledge or consent where required by applicable law or regulation. We may also process your Personal Data for our own legitimate interests such as:

- to assess the pension scheme's liabilities;
- to prevent fraud;
- to ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution
- to support internal administration with our affiliated entities.

You will not be subject to decisions based on automated data processing without your prior express consent.

Collection and Use of Sensitive Personal Data

Certain categories of Personal Data may be considered sensitive under the laws of your jurisdiction and may receive special protection, including:

- social welfare, sexual orientation
- physical or mental health or condition
- unlawful or objectionable conduct, criminal charges, or convictions

We may collect and process categories of sensitive Personal Data for the following legitimate business purposes either in connection with the administration of LGC pension or retirement benefits and/or to carry out our obligations under employment laws:

- data relating to leave of absence
- physical or mental health or condition or disability status to ensure employee safety in the workplace

We will only collect and process such sensitive Personal Data where we have a lawful basis to do so – for instance, where you have consented or where we are required to do so to carry out our obligations in the field of employment and social security law. Where there is a legitimate need to process your sensitive Personal Data for purposes not identified above, we will only do so after providing you with notice and, if required by law, obtaining your prior, express consent. For your awareness, your consent, once given, may be withdrawn at any time.

Data Sharing

We will only disclose your Personal Data to third parties where required by law or if it is necessary in order to achieve the purposes outlined above. We will do so to our employees, contractors, designated agents or trusted third-party service providers who require such information to assist us with administering the retirement benefit relationship with you. Further third-parties may include:

- the pension scheme's administrators, actuaries, legal advisers and auditors;
- LGC and its staff (whether employees or contractors), and
- our appointed agents and service providers (including third-party IT service providers who provide support to the systems which we use to administer the pension scheme, such as payroll processors and benefits administration providers)

These third-parties may be located outside of your home jurisdiction. We require all our third-party service providers, by written contract, to implement appropriate technical and organisational security measures to protect your Personal Data consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to process your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes in accordance with our instructions.

We may also disclose your Personal Data for the following additional purposes where permitted or required by applicable law:

- to other members of the LGC group of companies (including outside of your home jurisdiction) for the purposes set out in this Privacy Notice and as necessary to deliver retirement benefits to you;
- as part of our regular reporting activities to members of the LGC group of companies;
- to comply with legal obligations or valid legal processes such as court orders. When we disclose your Personal Data to comply with a legal obligation or legal process, we will take reasonable steps to ensure that we only disclose the minimum Personal Data necessary for the specific purpose and circumstances;
- to protect the rights of LGC;
- where the Personal Data is publicly available;
- should a business transfer or change in ownership occur; and/or
- for additional purposes with your consent where such consent is required by law.

Cross-Border Data Transfers

Where permitted by applicable law, we may transfer the Personal Data we collect about you to other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Privacy Notice. If you are located in the European Economic Area (EEA), we will implement standard contractual clauses approved by the European Commission. For those located in non-EEA countries, we will implement appropriate protections, including data transfer agreements, to secure the transfer of your Personal Data to any other jurisdiction.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your Personal Data against accidental loss and unauthorized access, use, alteration or disclosure. In addition, we limit access to Personal Data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your Personal Data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

Rights of Access, Transfer, Correction, Deletion, and Objection

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your scheme membership. By law you may have the right to request access to and correct the Personal Data that we hold about you or object to the processing of your Personal Data at any given time.

You may also have the right to request that we transfer your Personal Data to another party. If you want to review, verify, correct or request deletion of your Personal Data, object to the processing of your Personal Data, or request that we transfer a copy of your Personal Data to another party, please contact data.protection@lgcgroup.com. Depending on the jurisdiction where you are located, some of these rights may not apply.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the Personal Data that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the Personal Data that we hold about you, or we may have destroyed, erased, or made your Personal Data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Right to Withdraw Consent

Where you have provided your consent to the collection, processing and transfer of your Personal Data, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact your local Human Resources Department or email: data.protection@lgcgroup.com.

Data Protection Lead/Officer

LGC has an appointed Data Protection Lead in the Legal Team to coordinate LGC's Data Privacy practice and certain LGC entities may formally have appointed a Data Protection Officer. If you have any questions about this Privacy Notice or how we handle your personal data, or would like to request access to your personal data, please contact: data.protection@lgcgroup.com or the Legal Department, LCC, Queens Road, Teddington, Middlesex, TW11 0LY, UK.

Certain LGC entities are registered and/or notified to national data privacy supervisory authorities in relevant countries. If you are unsatisfied with our response to any issues that you raise with the LGC's Data Protection designated person, you have the right to make a complaint to the Information Commissioner's Office (ICO). For further information and guidance, please go to the ICO's website (www.ico.org.uk).

Changes to This Privacy Notice

We reserve the right to update this Privacy Notice at any time, and the most current Privacy Notice can be viewed at www.psgovernance.com/communications/lgc-staff-pension-scheme

For More Information

Please see the LGC Group **Data Privacy & Processing Policy (ISMS 2001)**

Effective Date: December 2020