

Britannia Refined Metals Retirement Plan- Privacy Notice

This updated Privacy Notice is being issued jointly by the Trustee and Plan Actuary of the Britannia Refined Metals Retirement Plan (the Plan) to comply with the United Kingdom General Data Protection Regulation ("UK GDPR"). The UK GDPR replaced its predecessor, the EU GDPR, after Brexit. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998 and under the EU GDPR and is for your information only.

Data controllers

In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and Scheme Actuary of the Plan are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the UK GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Plan's auditor or legal advisers.

The Scheme Actuary to the Plan is Ruth Thomas of Barnett Waddingham Actuaries and Consultants Limited.

The joint Data Controllers can be contacted as follows:

James Duggan, Secretary to the Trustee
PS Governance Services
Forbury Works
37 -43 Blagrove Street
Reading RG1 1PZ
Email: brm@psgovernance.com
Telephone: 0118 207 2913

Use, transfer and storage of personal data

In the course of running the Plan, we may require information from you in relation to your marital status (which may include the gender of your spouse or civil partner) and / or information about your (or your partner's) health. Such information will be used by the Plan's administrators to determine the benefits payable to you and your beneficiaries.

In addition, we may hold any or all of the following items of personal information about you:

- Personal details including your name, National Insurance number, gender, age, date of birth, postal and/or email address and telephone number.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the calculation and payment of your benefits from the Plan).
- Salary and data relating to investments and pension assets held outside of the Plan (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Plan).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the data controllers by the principal and/or participating employer of the Plan or may be obtained directly from you. It is not publicly accessible data. The personal data collected relates to your employment and membership of the Plan. We will keep your personal information for as long as we have a relationship with you or your dependents. When deciding how long to keep your personal

information after that relationship ends, we take into account our legal obligations and regulators' expectations.

The Trustee shares your data with the Plan's administrators Barnett Waddingham (DB section) and Aviva (DC section), Scheme Actuary, the sponsoring employer and AVC providers. They may also share data with the Trustee's other professional advisers (including the legal adviser, Plan Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator). We have measures in place to protect your data and when sharing your personal data with the administrator or another third party we will make sure that they too have appropriate measures in place to protect your data.

The Trustee may also share your data with the principal and/or participating employers of the Plan for the purposes of providing information to the members about access to the pension freedoms (either via a one-off exercise or as a business as usual offering).

Your data may be shared by the Plan's administrators with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive.

The Plan administrators, on behalf of the Trustee, will use your personal data to ensure that the correct benefits can be paid to you and that your requests can be dealt with efficiently, in accordance with the Trustee's **legal obligation** to run the Plan in accordance with the Trust Deed and Rules. The Trustee and / or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

In addition, it is in your and the Trustee's **legitimate interests** to use your personal information to:

- Keep up to date and accurate records about your membership of the Plan
so that the correct benefits can be paid
- Undertake risk-management exercises
so that the risk your benefits are not paid is reduced
- Comply with the law, including regulations and guidance issued by the Pensions Regulator
so that you, the Trustee and their advisers are not subject to legal sanctions which may impact benefits
- Efficiently manage the impact of any change to the legal status of the sponsoring company
so that your benefits are not adversely affected for example by a sale or company merger

The Scheme Actuary uses your personal data to advise the Trustee on the financial management of the Plan. This advice helps to ensure the Trustee is / are able to meet their obligations to pay members' benefits and is necessary to comply with obligations placed on them by legislation, including the Pensions Act 2004.

The Plan Actuary may also use your personal data in research which assists actuaries in providing this type of advice - for example research into the mortality experience (life expectancy) of pension Plan members in general. This may include the provision of personal data, anonymised as far as possible, to a recognised external authority, such as the Continuous Mortality Investigation (CMI) which investigates mortality experience on behalf of the Institute and Faculty of Actuaries.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

The Trustees suppliers have confirmed that they only process data within the EEA.

Your rights in relation to your data

The purpose of this Privacy Notice is to fulfil your right to be informed about the use of your personal data. In addition:

- You have the right to access your personal data, i.e. request to see the personal data held about you.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to request that your personal data is deleted or removed if there is no reason for its continued storage and processing.
- You have the right to object to your personal data being processed and to restrict the processing of your personal data in certain circumstances. While processing is restricted, the data controllers are permitted to store the personal data to ensure the restriction is respected in future. You will be informed if a restriction on processing is lifted.
- You have the right to lodge a complaint about the Data Controller with the ICO.

If you would like to discuss or exercise any of these rights, please contact the Data Controller at the address above.

Please note that if you choose to exercise your rights to withhold data or insist on its deletion, then the Trustee may not be able to perform their duties in relation to the Plan, and your benefits could be affected.

Further details about UK GDPR and your rights under UK GDPR can be found on the ICO's website at <https://ico.org.uk>