

PRIVACY NOTICE for the Cushon Master Trust (the “Scheme”)

This notice is for members and beneficiaries of the Scheme. It has been prepared by the Trustee Board (“Trustees”, or “we”) in their capacity as Trustees of the Scheme.

Why we are providing this notice to you

As the Trustees of the Scheme 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.

For the purposes of data protection legislation, the Trustees are data controllers. As controllers the Trustees hold and use your data (referred to as “processing” under data protection legislation including the Data Protection Act 2018).

Why we hold your personal data

The Trustees process personal data about you, in their role as controller, for the proper handling of all matters relating to the Scheme, 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 data*” below.

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

1. We need to process your personal data for the legitimate interests of: administering and managing the Scheme and liabilities under it; calculating, securing and paying benefits; and performing our obligations and exercising any rights, duties and discretions the Trustees have in relation to the Scheme.
2. 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.
3. We need to process your personal data to satisfy our legal obligations as Trustees of the Scheme.

This special category personal data might be obtained when gathering information about the persons to whom benefits may be payable on your death, such as your spouse, civil partner, or dependants, or in circumstances of ill health where you may want to take your benefits early or in a different form (where applicable).

The Trustees process special category personal data where necessary to establish, exercise or defend a legal claim, for example to establish whether you or your beneficiaries have a legal entitlement to a benefit under the Scheme.

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 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 Scheme; and
- 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 Scheme (where you are or could be a beneficiary of the Scheme as a consequence of that person's membership), and from a variety of other sources including public databases, our advisers, tracing agencies, insurers and government or regulatory bodies. In some circumstances the member may be providing data due to statutory requirements (e.g., disclosure legislation requires members to share information about when they flexibly access benefits elsewhere with the Trustees).

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 Trustees in writing. However, if you do not give consent, or subsequently withdraw it, the Trustees 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 Scheme, please ensure that those individuals are aware of the information contained within this notice. The Trustees assume members have their beneficiaries' consent to their data being shared with the Trustees.

How we will use your personal data

We may use this data to deal with all matters relating to the Scheme, 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 Scheme, 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 Trustees of the Scheme;
- 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 Scheme;
- the management of the Scheme's liabilities, including the entering into of insurance arrangements and selection of Scheme investments;

- for statistical and financial modelling and reference purposes; and
- in connection with the sale, merger or corporate reorganisation of the employers that sponsor the Scheme 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 Scheme. These include the following:

- The Scheme administrators, currently Link Pension Administration (HS) Limited, Cushon MT NI Ltd and Mercer;
- The administration platform provider, currently Cushon Group Limited;
- The Secretary to the Trustees, currently Cushon Group Limited;
- The legal advisers to the Trustees, currently Arc Pensions Law LLP;
- The Scheme auditors, currently Crowe UK LLP;
- The investment advisers, currently Isio Services Limited and Isio Group Limited;
- Tracing bureaus for mortality screening and locating members and beneficiaries, currently Lexis Nexis;
- The group life broker, currently Kerr Henderson;
- The group life insurer, currently Aviva;
- The group accidental death insurer, currently Chubb;
- The data analyst, currently Independent Transition Management (ITM) Ltd;
- The Scheme's banks, currently Barclays, HSBC and Royal Bank of Scotland;
- The web enabled system provider, currently ITS;
- Suppliers of IT, document production and distribution services;
- Payer of overseas benefits, currently Western Union; and
- From time to time, specialist advisers and auditors (however usually on an anonymised and aggregated basis).

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 directly.

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

In addition, where we make Scheme investments or seek to provide benefits for Scheme 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 Her Majesty's Revenue and Customs (HMRC). They may then use the data to carry out their legal functions.

In the unlikely event that recipients of your personal data are outside the EEA (this means your personal data may be transferred outside the EEA to a jurisdiction that may not offer an equivalent level of protection as is required by EEA countries), appropriate safeguards must be implemented with a view to protecting your data in accordance with applicable laws.

Please contact the Trustees, 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 Scheme 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 Scheme. We may also retain your data for a longer period to comply with our legal and regulatory obligations.

Your rights

You have a right to access and obtain a copy of the personal data that the Trustees hold about you and to ask the Trustees to correct your personal data if there are any errors or it is out of date. In some circumstances you may also have a right to ask the Trustees to restrict the processing of your personal data, to object to processing or to transfer or erase your personal data. You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their 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 Trustees using the contact details provided below. You also have the right to lodge a complaint in relation to this privacy notice or the Trustees processing activities with the Information Commissioner's Office, you can do this via the ICO's website or telephone helpline.

The personal data we hold about you is used to administer your Scheme benefits and we may from time to time ask for further information from you for this purpose. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the payment of benefits from the Scheme. In some cases, it could mean the Trustees are unable to put your pension into payment or have to stop your pension(if already in payment).

Updates

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

Contacting us

Please contact the Trustees for further information using the contact details below.

Scheme Administrator of the Cushon Master Trust

Link Pension Administration (HS) Limited
25 Goodlass Road
Liverpool LS24 9HJ

16 January 2024 Next review scheduled: (Q2 2024 – pre WPT membership migration to the Cushon platform)