

BE Wedge Holdings Limited Retirement and Death Benefits Scheme

Privacy Notice

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the BE Wedge Holdings Limited Retirement and Death Benefits Scheme (the Scheme) to comply with the General Data Protection Regulation (GDPR), which came into effect on 25 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998.

Data controllers

The Trustee of the Scheme is B.E.W.H. Pension Trustee Limited. The Scheme Actuary to the Scheme is Rebekah Boddy of Barnett Waddingham LLP. In accordance with guidance issued by the Information Commissioner's Office (ICO), the Trustee and Scheme Actuary of the Scheme are considered "joint data controllers" (the holders, users and processors of personal data) for the purposes of the GDPR. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Scheme Auditor or legal advisers.

The joint data controllers can be contacted via the Secretary to the Trustee as follows:

B.E.W.H. Pension Trustee Limited
BE Wedge Holdings Limited, Stafford Street, Willenhall, WV13 1RZ, UK
C/o Dawn Graham (Secretary to the Trustee)
Email: Dawn.Graham@wggltd.co.uk
Telephone: 01902 287854

Use, transfer and storage of personal data

In the course of running the Scheme, 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 Scheme'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.
- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent relevant for the calculation and payment of your benefits, or to the taxation of your Scheme benefits).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments and your HMRC tax code.
- 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 Scheme e.g. benefits payable on ill health).

Your personal data is provided to the data controllers by your employer 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 Scheme. Your personal data will be stored until such time as we no longer need it but in any event for not longer than 7 years after the date the Scheme is wound up.

The Trustee shares your data with the Scheme's administrator Barnett Waddingham, the Scheme Actuary, the sponsoring employers and AVC providers (for members who pay AVCs). They may also share data with the Trustee's other professional advisers (including the Scheme Auditor and pension consultants) and regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator).

The Trustee can also share your data with the employer 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) or other incentive exercises.

Your data may be shared by the Scheme's administrator with sub-processors for particular outsourced activities such as bulk printing jobs, confirmation of address/existence, offsite backup and archive. A comprehensive list of parties with whom data may be shared is set out in the Trustee's formal Data Mapping document, available on request in writing to the data controllers at the address above.

The Scheme 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 Scheme 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 Scheme
so that the correct benefits can be paid
- 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 Scheme. This advice helps to ensure the Trustee is 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 Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

The Trustee will take measures to avoid directly transferring your personal data to another country, unless you request for this to be done. However, some of the people we share your information with may process it outside of the UK and the European Economic Area. Most of these countries provide appropriate legal protection for your personal information but if this is not the case additional steps will be taken to ensure its protection. You can contact us for more information about the safeguards we use to make sure your personal data is protected if this scenario arises.

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. If you wish to request copies of your personal data please contact the data controllers at the address given above.
- You have the right to have your personal data rectified if it is inaccurate or incomplete.
- You have the right to have your personal data 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.

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