Bespak PLC Staff Retirement Benefits Scheme Privacy Notice

Please read this privacy notice carefully as it contains important information about who we are, what personal data (information) we hold about you, how and why we collect, store and use it, how we may share this information and your rights in relation to your personal information.

Who we are

Dalriada Trustees Limited as trustee ("**Trustee**", "**our**" "**us**", "**we**") of The Bespak Plc Staff Retirement Benefits Scheme (the Scheme) collects and uses certain personal information. When we do so, we are subject to the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018. We are responsible as 'controllers' of that personal information for the purposes of those laws. As controllers, we must provide you with the information contained in this Privacy Notice. Dalriada Trustees Limited (company number NI38344) has its registered office at Linen Loft, 27-37 Adelaide Street, Belfast, BT2 8FE.

Personal data we collect about you

Personal data is any information relating to an identified or identifiable individual.

We hold the following personal data about you in the course of acting as trustee of the Scheme:

personal details such as your name, date of birth, gender, contact details (i.e. address, home and mobile phone numbers, email address) and national insurance number;

employment details such as your employment history (including any breaks in service or where service has been transferred in), pensionable service records, salary information, contribution records;

details about your family and personal circumstances, such as your marital status, details of your spouse/civil partner, dependants, other family members and death benefit nominated beneficiaries;

financial details such as your bank account and tax information; and

We may also hold 'special categories' of personal data (i.e. sensitive information which comes with additional safeguards under data protection legislation). This may include information about your health, including any medical conditions (for example, if you apply for ill-health early retirement).

How we collect the information

We may collect this information from:

- you (for example when you fill in a pension form, when you contact the Scheme with a query or complaint);
- your employer;
- another pension arrangement (if you have transferred benefits into the Scheme);
- an existing member of the Scheme (if they choose to nominate you for the death benefits that may be due on their death);
- persons acting on your behalf; and
- service providers who help us trace members with whom we have lost contact.

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How we use your personal information

We will typically use this information for the following purposes:

- to contact you;
- to respond to individual queries, complaints and disputes;
- to calculate, provide and assess eligibility for Scheme benefits;
- to comply with obligations arising from administering the Scheme;
- to determine and implement alternative ways of providing Scheme benefits (e.g. by way of a lump sum and/or pension, transfer to another scheme, the purchase of an insurance policy, a merger with another pension scheme);
- to determine and manage Scheme investments and risks;
- to determine and manage Scheme liabilities and funding requirements; and
- in connection with any corporate activity a Scheme employer may be engaged in.

Reasons we can collect and use your personal information

The lawful basis on which we collect and use your personal data will usually be one or more of the following:

- your consent to the processing for any one or more particular purpose which we have explained to you;
- to comply with a legal obligation (e.g. our obligations to you as trustee to administer the Scheme so that you can receive the benefits you are entitled to and make transfers to other schemes);
- for the performance of a contract to you which you are a party, or to take steps at your request prior to entering into a contract; and
- for our legitimate interests (for example in running the Scheme properly, or where we need to contact you or deal with your queries) or those of a third party (e.g. your employer), but only if these legitimate interests are not overridden by your interests, fundamental rights or freedoms.

Where we hold 'special categories' of personal data, we will explain to you at the time we collect such personal data why we need it, and how it will be used. We typically process special categories of personal data only where it is necessary for us to carry out our obligations pursuant to social security and social protection law (for example where we need to do so to establish a right to a benefit). In any other circumstances where we need to process special categories of personal data we will seek your prior explicit consent.

Where we are carrying out processing on the basis of your consent, you have the right to withdraw that consent at any time by contacting us using the details provided. Any withdrawal of consent will not impact on the lawfulness of the processing which took place prior to the withdrawal.

We seek to ensure that our information collection and processing is always proportionate and follows the principles set out in applicable data protection laws. We will notify you of any material changes to the information we collect, the purpose for which we collect and process it and the lawful basis we may rely on for that processing.

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Who we share your personal information with

We share your personal data, including your name, date of birth and address details, with our Scheme administrators, actuaries, lawyers, advisers, bankers and investment consultant. This data sharing enables us to continue to administer the Scheme in a compliant manner and to ensure our duties as trustee are discharged lawfully.

We will share personal information with law enforcement or other authorities if required by applicable law.

We may share personal information with a Scheme employer; e.g. in connection with member option exercises an employer may want to run in connection with the Scheme.

We will not share your personal information with any other third party.

Third-party service providers such as the Scheme administrator are required to protect your personal information in line with our policies and we only permit them to process your personal data for specified purposes.

Transfer of your information out of the UK

In certain circumstances, your personal data may be processed outside of the UK.

If we (or our service providers) process personal data outside of the UK, we will take appropriate measures to ensure that your personal data is adequately protected in a manner which is consistent with this privacy notice and in accordance with safeguards required by applicable laws.

How long we keep personal data

We will keep your personal data for no longer than is necessary to fulfil our legal obligations in relation to the Scheme. Given the long-term nature of a pension scheme, this inevitably means that your personal data will be kept for a long period of time, including after you have ceased to be entitled to Scheme benefits (to deal with any queries or complaints which may arise in relation to the administration of the scheme or in the event of a legal claim to show that we have administered the scheme correctly). Personal data will typically be held until the Scheme has wound-up.

Your rights

Under the UK GDPR you have a number of important rights. In summary, those include rights to:

- fair processing of information and transparency over how we use your use personal information;
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- require us to correct any mistakes in the information that we hold about you;
- require the erasure of personal information concerning you in certain situations;
- receive the personal information about you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to a third party in certain situations;
- object at any time to processing of personal information concerning you for direct marketing;

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- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- object in certain other situations to our continued processing of your personal information; and
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Information Commissioner Office guidance at - Individual rights - guidance and resources | ICO.

If you would like to exercise any of those rights, please:

- email, call or write to the Scheme Secretary, Gabi Watt at gabi_watt@dalriadatrustees.co.uk and
- let us know the information to which your request relates, including any reference numbers, if you have them.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to contact us

Please contact the Scheme Secretary, Gabi Watt at gabi_watt@dalriadatrustees.co.uk if you have any questions about this Privacy Notice or the information we hold about you, including any requests to exercise your legal rights.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information. The UK GDPR also gives you the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.

Changes to this privacy notice

We may change this privacy notice from time to time. When we do, we will inform you. Please contact us using the details provided above if your personal data changes at all.

April 2024