

Ansa Logistics Pension Plan - Privacy Notice

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the Ansa Logistics Pension Plan (the Plan) to comply with the UK's implementation of the General Data Protection Regulation (UK GDPR), which came into effect on 28 May 2018. This document replaces any Fair Processing Notice issued under the Data Protection Act 1998. It is regularly reviewed by the Trustee.

Data controller(s) and Data Protection Officer(s)

The Trustee of the Plan is Ansa Logistics Pension Plan Trustees Limited. The Scheme Actuary to the Plan is Danny Wilding of Barnett Waddingham LLP.

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.

The joint data controllers can be contacted as follows:

Barnett Waddingham LLP
2 London Wall Place
123 London Wall
London
EC2Y 5AU
Email: ansa.admin@barnett-waddingham.co.uk
Telephone: 0333 11 11 222

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, HM Revenue and Customs (HMRC) tax code.

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 with Ansa Logistics Limited and membership of the Plan. 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 Plan is wound up.

The Trustee shares your data with the following:

- Barnett Waddingham LLP, who is responsible for the day-to-day administration of the Plan on the behalf of the Trustee.
- The Trustee's professional advisers, including the Scheme Actuary, auditor, pension consultants, investment adviser & lawyers.
- Esken Limited (the parent company of Ansa Logistics Limited), who may need personal data to assist with employer-initiated projects potentially including via incentive exercises such as Pension Increase Exchange exercises). HM Revenue & Customs & other statutory/regulatory bodies (including, but not limited to: the Department for Work & Pensions, the Pensions Ombudsman, the Pensions Regulator).
- Our Additional Voluntary Contribution (AVC) fund providers (currently Utmost Life and Pensions and Clerical Medical).
- Depending upon how we have to pay pensions & lump sums, personal data to effect a BACS transfer in the UK or abroad.
- Communication specialists for bulk mailings.
- The Clerk to the Trustee.
- Third parties who hold the Plan's data for IT back-up purposes as part of maintain data security.
- Third parties for confirmation of address/existence

We may also share personal data with any prospective insurance company in the event that the Trustee wishes to consider entering into a buy-in/buy-out of any or all of the benefits under the Plan.

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 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 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 applicable 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 Ansa Logistics Limited
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 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 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 scheme 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.

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 Controller at the address 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.

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/>.

Approved: 18 June 2018

Last review: 6 September 2023