

Appendix B – Privacy notice

Britannia Refined Metals Retirement Plan - Privacy Notice

This updated privacy notice has been issued by the trustee of the Britannia Refined Metals Retirement Plan (the "Plan") to comply with the UK General Data Protection Regulation (the UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

You should share this notice with your family and dependants where you have provided us with personal information about them. The trustee can be contacted as follows:

Emma Anderson, Secretary to the trustee
Vidett Governance Services
Forbury Works
37 -43 Blagrove Street
Reading RG1 1PZ
Email: brm@vidett.com
Telephone: 0118 207 2898

Data controllers

The trustee is a "controller" for the purposes of the data protection laws. The current data protection laws are set out in the UK GDPR and the Data Protection Act 2018, as amended.

You should share this notice with your family and dependants where you have provided us with personal information about them.

What is personal information

Personal information broadly means information that identifies (or which could, with other information that we hold or are likely to hold, identify) a living individual. This includes any information provided to us by or on behalf of you, the Plan's employer or HM Revenue & Customs (HMRC) in relation to your membership of the Plan.

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.

What types of personal information might we hold about you?

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.

- Details of your family, lifestyle and social circumstances. This could include details about your current marriage or civil partnership, any previous relationships and details of your family and dependants.
- 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 and where there is a legal basis for the processing of such data under the data protection laws).
- 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, career history, recruitment and termination details, absence record, job title and job responsibilities.
- Bank account details for payment of benefit instalments and HMRC tax code.
- Information about criminal convictions if these relate to money owed to the Plan's employers in circumstances where they are entitled to be reimbursed from your benefits.
- If you have used a pensions dashboard, an electronic pensions identifier and personal data supplied by you to enable your Plan pension to be located and information about it to be reviewed on the dashboard.

How long do we keep your information for?

We will keep your personal information for as long as we have a relationship with you or your dependants. When deciding how long to keep your personal information after that relationship ends, we take into account our legal obligations and regulators expectations.

If your pension is paid from the Plan when you retire, we will hold your information for the rest of your life, until your pension ceases on your death. If a pension is payable to any of your dependants after your death, we will continue to hold your information until their pensions cease. We will then continue to hold your information for an indefinite period after all benefits payable to you and your dependants have ceased, in case there are any further queries about your membership of the Plan.

If you cease to be a member of the Plan (e.g. because you transfer your benefits to another pension arrangement), we will hold your information whilst you are a member and then for an indefinite period after you cease to be a member, in case any further queries arise about your membership of the [Plan](#).

Who do we share the information with?

Where appropriate for the purposes of administering the Plan, we may share your information with:

- the Plan's administrators, (Barnett Waddingham (DB section) and Aviva (DC section)), the Plan Actuary, the sponsoring employer and AVC providers;
- the trustee's other professional advisers. This includes the legal adviser, the Plan Auditor, the Plan Actuary and pension consultants. These organisations use the information when advising the trustee and carrying out their respective professional obligations;
- regulatory bodies (including, but not limited to, HMRC, the Department for Work and Pensions and the Pensions Regulator);
- the Plan's insurers and annuity providers (and other insurers or brokers for the purpose of obtaining quotations relating to the Plan or its benefits including UK regulated bulk annuity providers if the Plan is looking to secure the liabilities with an insurer), investment managers, banks and other service providers;
- any financial adviser or other organisation appointed by the trustee to advise you about your options under the Plan or any adviser appointed by you where you have asked us to provide them with details of your benefits under the Plan;
- any other person who is authorised to act on your behalf;

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- any relevant ombudsman, dispute resolution body or the courts;
- persons in connection with any sale, merger, acquisition, disposal, reorganisation or similar change in the sponsoring company's business;
- a qualifying pensions dashboards provider or the Money and Pensions Service to ensure your information is available to be viewed via a dashboard service; and
- a third party integrated service provider (which facilitates the Plan's connection to the pensions dashboard ecosystem) to enable us to comply with our pensions dashboard duties.

The entities listed above may also share personal data with their own business suppliers, for example in relation to the operation of IT systems or where they outsource part of their services.

Some of these entities may also be controllers under the data protection laws (which could include the legal adviser (Pinsent Masons LLP), auditor (Deloitte) and the Plan Actuary (Ruth Thomas of Barnett Waddingham Actuaries and Consultants Limited)). However, in the first instance you should contact the trustee using the contact details above if you have any queries about how they use your personal information.

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.

Please note that some of the Plan's former service providers may continue to hold information about you for their own record keeping purposes once they have ceased to be involved with the Plan.

We have measures in place to protect your data and when sharing your personal data with the administrator or another third party (as set out in the Data Protection Policy) we will make sure that they too have appropriate measures in place to protect your data.

Why do we hold this information?

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 Plan administrators will also use your personal data for compliance purposes, for instance to assist us in complying with your duties in relation to pensions dashboards. The trustee and/or administrators may contact you directly in order to provide relevant information, or to deal with your queries.

What do we do with the information?

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, government departments and law enforcement or tax authorities or in connection with any disputes or litigation
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;*
- notify you about services provided to members of the Plan and any changes to those services or to enable you to access those services
- comply with our duties in relation to pensions dashboards.

The Plan 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 its obligations to pay members' benefits and is necessary to comply with obligations placed on it 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 Plan Actuary will not pass your personal data to any third party without the prior agreement of the trustee.

The trustee's suppliers have confirmed that they only process data within the UK.

Where we store your personal data

The data that we collect from you will [usually] be stored inside the UK.

However, if you live or work outside of the UK, we may need to transfer data outside of the UK to respond to any queries that you may have. Data may also be transferred outside the UK where the Plan's service providers or third parties such as insurers and reinsurers host data outside the UK. Where this applies, we will take all steps reasonably necessary to ensure that data is treated securely and in accordance with this privacy notice.

These transfers will be governed by the data protection laws. We may transfer data outside the UK to a country which the UK government considers ensures a level of protection that is not materially lower than UK standards. This would include countries within the European Economic Area (EEA). If the transfer is not approved by the UK government, we may only transfer data if appropriate safeguards are in place and we consider that the level of protection provided for data subjects is not materially lower than UK Standards. You can contact us if you would like more information about these safeguards.

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 complain to the trustees; and
- you have the right to complain to 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>

Records of processing activities

The trustee will maintain a written record of their processing activities as controller. This will set out:

- names and contact details and those of any joint controller;
- the purpose of the processing;
- the categories of data subjects and the categories of personal data;
- the categories of recipients to whom data has been or will be disclosed;
- details about transfers of data outside the UK, including the name of the recipient country, and of the safeguards in place;
- the time limit for retention of the data;
- a general description of the technical and organisational security measures implemented; and
- information relating to the conditions under which special category data and information relating to criminal convictions is processed.

The trustee's processors must maintain similar records.

Data protection impact assessments

If the trustee believes that a new form of processing will carry a high risk, for example if it uses new technologies, an impact assessment may be carried out.

However, in many cases, the trustee expects that its processors will have carried out assessments in those circumstances as to the level of risk involved.

Any complaints?

If you are not happy with the way in which your personal information is held or processed, or believe that your data protection rights have been infringed have the right to raise a complaint with us.

You can contact us using the contact details set out at the start of this notice.

We aim to resolve complaints as quickly as possible and within a reasonable timeframe, taking into account the nature and complexity of your complaint.

If you have any concerns about how we use your personal data, you may raise a complaint with us using the contact details set out above. We will investigate and respond in accordance with our complaints handling process. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113 ([org.uk/](https://ico.org.uk/)). The ICO

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Changes to this privacy notice

This privacy notice is current as at April 2026.