

This Privacy Notice has been issued by the Trustee and Scheme Actuary of the Lansing Linde Executive Pension Scheme (the Scheme) to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (together, the Data Protection Legislation).

This privacy notice summarises how and why we collect your personal information (which is information that identifies you or could identify you with other information we hold), what we do with it and what rights you have in relation to it. It covers all personal information that we collect and use in relation to the Scheme.

Data controllers

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 Data Protection Legislation. It is possible that in some circumstances other professional advisers may be considered to be data controllers. This might include the Scheme's auditor or legal advisers.

The Scheme Actuary to the Scheme is Zafar Basit of Mercer Limited.

The joint Data Controllers can be contacted as follows:

The Trustee of the Lansing Linde Executive Pension Scheme
c/o Vidett Governance Services Limited
Forbury Works
Reading, RG1 1PZ

Email: kion@vidett.com

Telephone: 0118 207 2900

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.
- 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).
- Salary and data relating to investments and pension assets held outside of the Scheme (to the extent they are relevant for the calculation and payment of your benefits, or to the taxation of your benefits from the Scheme).
- Employment history, including employment dates and historic pay records.
- Bank account details for payment of benefit instalments, HMRC tax code.

Your personal data is provided to the data controllers by the principal and/or participating employer of the Scheme 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. 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.

The Trustee shares your data with the Scheme's administrator, Aptia, the Scheme Actuary, the sponsoring employers and AVC providers. They may also share data with the Trustee's other professional advisers (including the legal adviser, Scheme Auditor and pension consultants), regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions and the Pensions Regulator), and UK regulated bulk annuity providers if the Scheme is looking to secure the liabilities with an insurer. We have measures in place to protect your data and when sharing your personal data with the administrator or another third party we will make sure that they too have appropriate measures in place to protect your data.

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.

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
- 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 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.

The Scheme Actuary will not pass your personal data to any third party without the prior agreement of the Trustee.

In certain circumstances your personal data may be processed in countries outside the European Economic Area (EEA), which are not covered by the Data Protection Legislation. For example, third party providers may store certain data in a country outside the UK and the EEA.

We will only transfer personal data to an overseas third party or international organisation if one of the following applies:

- The UK Government has issued a decision confirming that the country to which we transfer the personal information ensures an adequate level of protection for the data subjects' rights and freedoms;
- Appropriate safeguards are in place such as UK binding corporate rules, standard contractual clauses approved by the UK Government, including the International Data Transfer Agreement or the International Data Transfer Addendum (which is an addendum to the new standard contractual clauses issued by the European Commission under the EU GDPR on 04 June 2021), or an approved code of conduct or a certification mechanism; or
- The transfer is necessary for one of the other reasons set out in the UK GDPR or is otherwise in compliance with UK data protection legislation.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data internationally.

From time to time, we may need to share Scheme personal information with other organisations in order to administer the Scheme. In keeping with our duty to act in the best interests of Scheme beneficiaries and our other legal obligations, we will only share personal information when necessary and fair, and when we are satisfied that it will remain secure.

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, ie 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 lodge a complaint about the Data Controller with 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 Scheme, and your benefits could be affected.

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