

Vertu Retirement Benefit Scheme

Privacy Notice – May 2026 (DUAA25 update)

This Privacy Notice is being issued by the Trustee of the Vertu Retirement Benefit Scheme (the “**Scheme**”) to comply with the United Kingdom General Data Protection Regulation (“**UK GDPR**”) as amended by The Data Protection Act 2018 (“**DPA2018**”) and the Data Use and Access Act 2025 (“**DUAA25**”). The UK GDPR replaced its predecessor the EU GDPR, after Brexit. This document replaces any Fair Processing Notice previously issued under the Data Protection Act 1998 and under the EU GDPR and is for your information only.

The terms “**personal data**” and “**personal information**” are used interchangeably and they have the same meanings.

Data Controller

In accordance with guidance issued by the Information Commissioner’s Office (“**ICO**”), the Trustee is the “**Data Controller**” (the body or person who exercises overall control over the purposes and means of the processing of personal data) for the purposes of the UK GDPR. It is possible that in certain circumstances, other professional advisers appointed by the Trustee to the Scheme may also be considered to be a “Data Controller”. This would include the Scheme auditor or the Scheme’s legal advisers. These advisers would then be a “Joint Data Controller” with the Trustee.

The Trustee maintains procedures to enable data subjects to exercise their rights, including complaint handling under the DUAA25.

The Scheme Trustee is Vidett Trust Corporation Ltd, a professional trustee.

The Data Controller can be contacted as follows:

The Trustee of the Vertu Retirement Benefit Scheme
c/o Vidett Trust Corporation Limited
Forbury Works
37-43 Blagrove Street Reading
RG1 1PZ

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 health (or your spouse / partner’s health). Such information will be used by the Scheme’s administrators to determine the benefits payable to you and your beneficiaries. The Scheme’s administrators are Broadstone Corporate Benefits Limited (‘Broadstone’).

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, age, date of birth).
- Contact details (including postal and/or email address and telephone number).
- Your gender. We only use this, if you provide it, to understand how long you are likely to receive your pension for and as part of your addressee details if we write to you e.g. ‘Mr., Mrs., Ms...’.
- Descriptions relating to your physical and mental health (to the extent that they are relevant to the payment of 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).
- If your benefits from the Scheme form part of a divorce settlement, details of that settlement.
- Any information you have provided about who you would like to receive benefits due on your death. This could be your spouse or civil partner, your child or other dependent, and it could include birth, adoption details of children, marriage certificate details, and change of name details.
- Employment history, including employment dates and historic pay and salary records.
- Bank account details for payment of benefit instalments, and HMRC tax code.
- If you have used a pensions dashboard, an online platform where you can access information about your pension benefits, a "pensions identifier" which is a string of characters used to identify your specific benefits under the Scheme.

Whilst the Scheme was ongoing, your personal data was provided by you. The data held is not publicly accessible. The personal data collected relates to your membership of the Scheme. Your personal data may also come from another pension scheme if you have transferred benefits from that scheme; from government departments such as HMRC or DWP; and from publicly accessible sources (e.g. the electoral roll) if the Data Controller has lost touch with you and is trying to find you. If the Data Controller asks you for other information in the future (for example, about your health), they will explain whether you have a choice about providing it and the consequences for you if you do not do so.

We will keep your personal information for long enough to make sure that we can satisfy our legal obligations in relation to the Scheme and pay any benefits due to or in respect of you. Upon death or transferring out of the Scheme ("Trigger Event"), we keep your information for long enough to ensure that, if a query arises in the future about your benefits, we have enough information to deal with it where we have a legal obligation to do so. To meet this aim, the personal information that we hold will be kept for a period depending on how long we sensibly think we need it to deal with queries (from you or your beneficiaries/other persons who might ask us if they are entitled to payments), complaints (from you or them), our legal obligations as mentioned above and expectations of the Regulator. In any event, this means that we may need to keep your information for a period of up to 75 years after the occurrence of a Trigger Event. Where there is a maximum limit on how long we can keep certain personal data for, such as in relation to Pensions Dashboards, we will comply with that restriction.

The Trustee shares your data with the Scheme's administrator and the Scheme's appointed professional advisers (including the legal adviser, Scheme auditor and pension consultants), insurers (where appropriate), independent financial advisers, regulatory bodies (including, but not limited to, HM Revenue and Customs, the Department for Work and Pensions, the Pensions Regulator, the Fraud Compensation Fund), IT and data storage providers and other service providers such as tracing agencies who we use to try to trace you if you are not at the address we have on your record and also mailing companies who print and post letters and documents to you on our behalf. We have measures in place to protect your data and when sharing your personal data with the Scheme administrator or another appointed third party, we will make sure that they too have appropriate measures in place to protect your data. If your benefits are transferred to another pension scheme, the Trustee will also need to provide the administrators of the receiving scheme with information about you and your Independent Financial Adviser if you have one.

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. In such circumstances the Scheme administrator will ensure appropriate safeguards are in place.

The Scheme administrator, 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** (including any contractual obligations relating to complying with the requirements of Pensions Dashboards) to run the Scheme in accordance with the Trust Deed and Rules. The Trustee and / or the Scheme administrators may contact you directly in order to obtain relevant information, or to deal with your queries.

The Trustee will use your personal information to comply with these legal obligations, to establish and defend their legal rights, and to prevent and detect crimes such as fraud. The Trustee may need to share your personal information with other people for this reason, such as courts and law enforcement agencies. The Trustee may share personal information with the Pensions Regulator and ICO to answer questions in the usual way of reporting things to them.

Automated Decision Making

We may use automated processes (e.g. pensions dashboards matching, benefit calculations). You have the right to request human review, challenge decisions, and make representations.

Sensitive Personal Data

When the Trustee needs to use information about your health (or other very personal or sensitive data), they will generally ask for your explicit consent. However, sometimes there may be reasons of public interest or law which enables the Trustee to use this information without consent, and if that's the case, the Trustee will do that where it is necessary to run the Scheme in a sensible way. You can withdraw your consent at any time by contacting the Trustee using the contact details given at the beginning of this notice. This may affect what the Trustee can do for you unless they have another lawful reason for using your information.

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 the Scheme 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, company merger, dissolution or insolvency event.*
- To the extent required to comply with our duties in relation to individuals using Pensions Dashboards. This includes "matching", where we use personal data that a user has provided to search our Scheme records to check whether that user is a member of the Scheme, and where we collect further personal data from that user in the event of a "possible match".
- We may rely on **recognised legitimate interests** introduced by the DUAA25, including prevention of fraud and safeguarding.

When assessing whether a need to use personal data falls within a legitimate interest, the Trustee would generally assess whether your own interests, rights and freedoms under data protection laws are looked after when also considering the legitimate interest of the employer/third party in wanting to carry out the exercise. In this way the Trustee can protect your own rights under data protection laws.

Data Sharing with insurers

The Trustee may need to share personal data with insurers when they are looking at purchasing and pricing up insurance contracts called 'annuities' (unless that can happen based on anonymised data). This will be used by them for verification about the assets and liabilities of the Scheme. They check the details relevant to members and beneficiaries of the Scheme before the insurance contracts can be put in place. Sometimes the Trustee will write to you before purchasing an annuity to ask you for up to date information about your spouse, partner, children or other dependents to this end.

After that, the Trustee will usually share personal data when they purchase the annuity and at that stage the insurer will typically share information with its chosen re-insurer. Sometimes the insurer's privacy notice will mention who its re-insurer is and how to see its privacy notice (either giving you a link to it online or explaining where it can be seen or by providing a copy of it). The Trustee would assess whether your own interests, rights and freedoms under data protection laws are such that they outweigh the Trustee's own legitimate interest in purchasing these types of insurance contracts. The Trustee would usually write to members to explain about the particular annuity and who the insurer is. In this way you know who holds your personal data and how to exercise your rights against them. Typically the Trustee would share the following personal data with insurers: Scheme membership ID number in relation to the Scheme; marital status and details about spouse/partner; DOB; birth/marriage certificate details and marital survey response forms; information about annual pension increases; pension/benefit amounts payable; age at retirement; service length and retirement date.

Overseas data processing

Some of the firms that the Trustee shares your personal information with may process it overseas. Some countries already provide adequate legal protection for your personal information, but in other countries, additional steps will need to be taken to protect it. This means that your personal information may on occasion be transferred under what is called a 'restricted transfer'. This means a transfer to a country or territory which needs a mechanism in order for it to be lawful under data protection laws. Such mechanisms include legal terms such as 'standard contractual clauses' – these are contracts for transfers of personal information to countries and territories which do not have appropriate data protection laws as compared with the data protection laws applicable in the UK. If your personal data is going to be part of a 'restricted transfer' to countries outside the UK and which are not in the EU or European Economic Area (EEA) i.e. which are not covered by the UK GDPR or EU GDPR or equivalent laws, then in such circumstances we will ensure appropriate safeguards are in place. You can ask the Trustee for details of the mechanisms used.

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 and to obtain information about how we process it. We will undertake *reasonable and proportionate searches* and may pause responses pending clarification that we need.
- 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 any data controller with the ICO.
- You have the right to, in particular circumstances move, copy, or **transfer** your information.
- You have the **right to complain** directly to the Trustee. Complaints will be acknowledged within **30 days** and resolved without undue delay.

If you would like to discuss or exercise any of these rights, please contact the Trustee at the address above.

If your request to access your personal information is complex (for instance, because of the volume and other factors) the Trustee can by law take up to 2 more months to respond to it (in addition to the 1 month usual statutory deadline) if that is necessary. The Trustee will explain this at the time of a request to make sure you are aware of this too.

Important: 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 its duties in relation to the Scheme, and your benefits could be affected.

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

This notice may be updated to reflect subsequent changes introduced by the DUAA25.

Issued by:

The Trustee
Vertu Retirement Benefit Scheme
Dated: May 2026