

Warner Electric Limited Retirement Benefits Scheme

Privacy Notice – incorporating the Data (Use and Access) Act 2025

May 2026

1. Introduction

This Privacy Notice explains how the Trustee of the Warner Electric Limited Retirement Benefits Scheme (the “**Scheme**”) collects, uses, shares and protects your personal data. It reflects the requirements of:

- The UK General Data Protection Regulation (“**UK GDPR**”)
- The Data Protection Act 2018
- The **Data (Use and Access) Act 2025 (“DUAA”)**, which introduced important changes to UK data protection law, including updates to subject access requests, complaints rights, use of automated decision-making, recognised legitimate interests, and digital identity verification services.

The terms “**personal data**” and “**personal information**” are used interchangeably in this notice.

2. Data Controller

In accordance with guidance issued by the Information Commissioner’s Office (“**ICO**”), the Trustee of the Rabobank London Branch Pension Fund and the Scheme Actuary are considered to be “**Joint Data Controllers**” (“**JDC**”) (the holders, users and processors of personal data) for the purposes of the UK GDPR.

It is possible that in certain circumstances, other professional advisers appointed by the Trustee may also be considered to be “data controllers”. This would include the Scheme’s auditor, or the Scheme’s legal advisers. The Scheme Actuary is Barbara-Ann Thompson of Barnett Waddingham LLP.

The Scheme’s JDC’s can be contacted as follows:

The Trustee
c/o Vidett Trust Corporation Limited
Forbury Works, 37–43 Blagrove Street
Reading RG1 1PZ

Barbara-Ann Thompson FIA C.Act
Barnett Waddingham LLP
City Square House
11 Wellington Street, Leeds
LS1 4DL

Under the DUAA, the Trustee is also responsible for responding to statutory **data protection complaints** raised directly by members and must **acknowledge such complaints within 30 days**.

3. What Personal Data We Collect

We hold personal data necessary to administer the Scheme and pay members' benefits. This may include:

- Personal identifiers (name, date of birth, NI number)
- Contact details (address, email, phone number)
- Gender (used only for benefit calculations and correspondence)
- Marital status and dependants
- Health information relevant to benefit entitlement
- Employment and salary history
- Bank details for payment of benefits
- Details relating to divorce or pension sharing
- Beneficiary nomination information
- Tax information (e.g., HMRC tax code)

We may also receive information from your current or former employer, previous schemes, HMRC, DWP, tracing agents or other service providers.

4. Why We Use Your Personal Data

Your data is processed for the following purposes:

4.1 Legal obligations

To operate the Scheme in accordance with the Trust Deed and Rules, pensions legislation and regulatory requirements (including TPR and HMRC).

4.2 Contractual and benefit obligations

To calculate and pay the correct benefits, respond to your enquiries, and maintain accurate records.

4.3 Recognised Legitimate Interests (DUAA)

The DUAA introduced a new lawful basis called **Recognised Legitimate Interests (RLI)**, enabling certain processing—including safeguarding vulnerable individuals—without the need for the traditional balancing test. The Trustee may rely on RLIs where appropriate.

4.4 Standard legitimate interests

For example:

- Scheme risk-management
- Maintaining accurate records
- Supporting employer-led exercises related to benefits
- Managing the impact of corporate changes

4.5 Special category data (e.g., health)

This is processed only where necessary for benefit entitlement, with your explicit consent unless another legal ground applies.

5. Automated Decision-Making (ADM)

Under the DUAA's updated risk-based framework, ADM may be used in certain limited situations, usually for actuarial or administrative modelling. Where ADM is used:

You have the right to:

- Request **human intervention**
- Receive an **explanation** of the ADM process
- **Challenge** the decision

The Trustee has no plans to use ADM at this time.

6. Digital Verification Services (DVS)

In line with the DUAA, the Trustee may use **certified Digital Verification Services (DVS)** under the Digital Identity & Attributes Trust Framework to confirm your identity securely. Safeguards will be applied to protect your information.

7. Sharing Your Data

Your personal data may be shared with:

- Scheme administrator and its approved sub-processors
- Scheme Actuary, Auditor, legal advisers and other professional advisers
- Rabobank as current or former employer
- Insurers (e.g., for annuity quotations and buy-in/buy-out transactions)
- Regulatory bodies (HMRC, DWP, TPR, ICO)
- Tracing agencies
- IT and data-hosting providers, including in relation to Pensions Dashboards

Under the DUAA, the ICO has **enhanced powers**, and the Trustee may be required to supply documents or participate in interviews.

8. International Transfers

If your data is transferred outside the UK, including restricted transfers to countries without adequacy decisions, we will ensure appropriate safeguards, such as **UK Standard Contractual Clauses**, are in place. DUAA-aligned measures will also be applied where required. You may request details of applicable safeguards.

9. How Long We Keep Your Data

We keep your data for as long as necessary to operate the Scheme, pay benefits and meet legal obligations. In practice, this may be up to **75 years** after a “Trigger Event” (e.g., your death or transfer from the Scheme). This ensures we can respond to future queries or claims.

10. Your Rights

You have the following rights under UK GDPR and the DUAA:

10.1 Right to be informed

This Privacy Notice fulfils that requirement.

10.2 Right of access (DSARs)

Under the DUAA:

- Only **reasonable and proportionate searches** are required.
- The Trustee may **pause (“stop the clock”)** the statutory timeframe while verifying your identity or clarifying your request.

10.3 Rights to rectification, deletion, restriction, objection and data portability

Available subject to legal constraints.

10.4 Right to lodge a complaint with the Trustee (DUAA)

You may raise a data-protection complaint directly with the Trustee.

- The Trustee **must acknowledge the complaint within 30 days**.
- An outcome will be provided **without undue delay**.

You may also contact the ICO if you remain dissatisfied.

10.5 Impact of withholding data

If you ask us to delete or restrict data, we may not be able to pay or administer your benefits.

11. Contacting Us

To exercise your rights or make a complaint, please contact:

The Trustee

Warner Electric Ltd Retirement Benefits Scheme
c/o Vidett Trust Corporation Limited
Forbury Works, 37–43 Blagrove Street, Reading RG1 1PZ

Further information about your rights is available from the ICO at **ico.org.uk**.

Issued by:

The Trustee

Warner Electric Limited Retirement Benefits Scheme

Date: MAY 2026