

# **General Data Protection Regulations**

## **Privacy Statement**

### **The One Ecolab Pension Plan (the “Plan”)**

This Privacy Statement, which is a requirement of legislation (the UK General Data Protection Regulation (and the EU General Data Protection Regulation to the extent it applies to the UK) (the "GDPR") and the Data Protection Act 2018), explains how we, the Trustee of your Plan as Data Controllers, use the data we collect about you. This legislation also makes reference to the position of a Data Protection Officer, particularly in the context of data breaches and complaints. The Trustee of the Plan has taken advice and decided that it is not required to have an appointed Data Protection Officer.

#### **Purpose of the processing and the legal basis for the processing**

As the corporate trustee of an occupational pension scheme, the Trustee's fundamental responsibility is to administer the Plan for the benefit of the members and any other beneficiaries. Types of personal data that we collect and use for this purpose include: Name, date of birth, gender, marital status, contact details; employment history including salary information; National Insurance details, HMRC Tax Code; bank/savings account details; health information and contact details to support identity verification and communication.

If you request to find or view any pensions you have with us via a pensions dashboard, we will receive details of your request in an encrypted format. Your identity will have been verified and your consent obtained by the dashboard at the time of your request. Your identity verification and consent will also be received by us. We may also receive your personal data in pseudonymised form from a pensions dashboard, or from the underlying systems operated by the Money and Pensions Service.

The data that we collect in relation to you will be used to allow you to:

- i) join the Plan (details of your name and date of birth and your initial salary would all be required) and to ensure the efficient and regulatory compliant running of the Plan;
- ii) remain a member of the Plan (whether that is an active member, a deferred member who has left employment with the employer that sponsors the Plan or as a pensioner);
- iii) request and view your pension information via a pensions dashboard

and to allow us to:

- i) communicate with you (and your beneficiaries if applicable) about your benefits (and the benefits that are due or potentially due to your beneficiaries in the event of your death) from the Plan and also about the Plan;
- ii) respond to requests for information or queries on your benefits (and the benefits of your beneficiaries);

- iii) assess your entitlements and to pay to you and/or your beneficiaries, benefits (pension and lump sum) from the Plan;
- iv) (in respect of requests made via a pensions dashboard), authenticate your request, and make your pensions data available to you on that dashboard. In order to comply with this legal obligation, we will need to connect to the digital architecture operated by the Pensions Dashboard Programme, a function of the Money and Pensions Service (MaPS), and where a request for information is received, share accurate, up-to-date information relating to your pension.

The Trustee does not use your personal data for any statistical analysis in order to facilitate the sale of any services or goods to you.

The Trustee is required to advise you if automated decisions, so decisions that do not involve consideration by other individuals, occur in relation to your data. We can confirm that there are no automated decisions that have significant consequences in relation to you as the data subject being undertaken in respect of the data that we hold as data controllers or by any of the data processors with whom we share data.

**The lawful bases on which the Trustee holds and uses your data are that this is necessary for the purposes of legitimate interests pursued by the Trustee and that this is necessary for the purpose of complying with legal obligations to which the Trustee is subject.**

*For these purposes legitimate interest means our interests as Trustee in running the Plan as effectively, efficiently and securely as possible. We include within this our obligations to run the Plan in keeping with legal requirements, which include but are not limited to trust law, pensions legislation, tax law and regulatory guidance.*

*As Trustee we also have duties and powers some of which are conferred by law and some by the governing documentation of the Plan. Utilisation of data in order to ensure we comply with these duties and powers is also a part of our legitimate interests and legal obligation compliance requirement.*

*All the processing we do of personal data is designed to ensure that all members receive their appropriate entitlement to a pension and other benefits.*

*We do not consider that these legitimate interests and the legal obligation compliance requirement would cause harm or hurt to any individual in respect of whom we hold data.*

*Any sensitive data (information on ethnicity, religious belief, trade union membership, sexual orientation or health etc.) we hold:*

- *having gained your express consent relating to the data and the reason we intend to hold that data; or*
- *in reliance on an alternative legal basis for processing this information under data protection legislation; in particular, the "Employment, social security and social protection" provisions of the GDPR and the Data Protection Act 2018. Such provisions allow the processing of sensitive data where the processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment, social security or*

*social protection. Where the Trustee relies on such an alternative legal basis, the Trustee will ensure that appropriate and adequate policies and safeguards are in place.*

## **Do we share your data?**

At present we may share your personal data with:-

- Your current or former employer Ecolab Limited (or other participating companies i.e. Nalco Limited, Nalco Manufacturing Limited, Purolite Limited or Ecolab Manufacturing UK Limited) in relation to the Plan;
- The administrators of the Plan to whom we as Trustee have delegated some of the day to day and ongoing activities essential to the running of the Plan;
- A professional actuary appointed as the Actuary to the Plan so that they can carry out the necessary calculations in order to assess the benefits and to assist us with agreeing payments to the Plan to fund the benefits;
- Insurers who provide the Trustee with insurance to cover payment of benefits or from which we purchase policies to provide pension benefits when members come to retire (an annuity), life assurance benefits where applicable, and brokers typically involved in arranging such insurance;
- Investment managers, professionals with the relevant experience to advise the Trustee on the investment of the Plan assets;
- Plan auditors, all pension schemes are required to have professional auditors appointed, who review and input into the Plan's annual accounts;
- Legal advisors who advise the Trustee on compliance with legislation and other legal issues to ensure the legal and effective running of the Plan on your behalf;
- the Money and Pensions Service (encrypted personal data), in its role as operator of the IT systems underlying the pensions dashboard programme. We will also share prescribed pensions data with the pensions dashboard provider which you use to request your pensions information. We may also engage integrated services provider and other IT consultancies, vendors or suppliers, in connection with performing our legal obligations concerning pensions dashboards.

On specific occasions we may also share your data with:

- Appointed covenant advisors who are specialists with knowledge and expertise in assessing the financial strength of the company/organisation supporting the Plan;
- Benefit consultants who provide advice to us about the design of the Plan;

- Other third parties who provide one off services such as tracing services where we are unable to locate an individual who we believe has an entitlement under the Plan, organisations that provide secure data storage or destruction and IT specialists who advise on disaster recovery and cyber security.

We can confirm that all third parties with whom we share your data have contractually committed to compliance with the GDPR.

## **Data Retention**

As long as you remain a member of the Plan with an entitlement to a benefit either for yourself, or your beneficiaries or your estate, we will retain the information necessary to allow us to fulfil our legitimate interests and manage and eventually pay that benefit entitlement. In some circumstances, the Trustee may continue to retain data after a benefit has ceased to be payable, for example, on the transfer out of a member's benefit. This is because it is important to show that payments have been made correctly, that Plan liabilities have been discharged and so that the Trustee can respond to queries raised in the future.

In connection with the pensions dashboard programme, we generate pension identifier codes which link your request with a pension plan you have with us. These codes can be deleted by you if you delete your account with the relevant pensions dashboard. They will also automatically expire if your dashboard account remains inactive for 5 years (or other time scale determined by the Money and Pensions Service). We also retain on a long-term basis identifier codes which link multiple requests for the same information made by you via a pensions dashboard.

The Trustee has a data retention policy which sets out the full details in relation to all the data that is held.

## **Virtual Working**

The processing of personal data by the Trustee may be carried out in a virtual environment, particularly where significant amounts of work are completed by individuals working at home. Such work may involve the remote accessing of personal data and video calls on which personal data is shared. The Trustee has arrangements in place only to use methods and technologies that it considers to be secure for this purpose.

## **Your Rights**

As an individual on whom we hold personal data you have rights in relation to that data and this Privacy Statement informs and confirms to you those rights. You have as a data subject the right:-

- to have access to your personal data by writing to the Trustee at the address at the end of this Statement, and you have the right to have your data transferred to you or to another Data Controller in a structured, commonly used and machine-readable format.
- to have your personal data amended if it is inaccurate or is not complete.
- to have your data deleted if there is no legitimate reason for its continued storage or processing.

- to object to your data being processed and to restrict the processing of your data in certain circumstances.
- to make a complaint about the processing of your data and the Trustee as data controller to the Information Commissioner's Office and contact details are at the end of this Statement.

If you have given your consent to the use of your personal data (including sensitive data), you can withdraw that consent at any time.

*Please be aware that on exercising your rights, particularly your right to withdraw consent, have data deleted and your right to object to or restrict processing of your data that the Trustee may not be able to fulfil its obligations to you in relation to the Plan in pursuance of its legitimate interests and that your entitlement to benefits may be affected. It may also be the case that the Trustee is able to confirm circumstances whereby your right is not going to be enforced where it is legally acceptable to do so and it will in that instance confirm the reasons for that decision.*

As the Plan's Actuary needs to have access to personal data about our defined benefit membership to determine the benefits payable, Willis Towers Watson will, in some circumstances, be joint data controllers. A link to Willis Towers Watson's own Privacy Notice can be found at:

[www.willistowerswatson.com/personal-data](http://www.willistowerswatson.com/personal-data).

Any future updates to the Willis Towers Watson Privacy Notice will be available on their website at [www.willistowerswatson.com/personal-data](http://www.willistowerswatson.com/personal-data)

If you are a defined contribution member otherwise known as a money purchase member (and/ or have made additional voluntary contributions to the Plan), you should review the L&G web site for details of L&G's own data protection privacy policy:

<http://www.legalandgeneral.com/workplacebenefitsResp/ecolab/privacy/>

Shoosmiths LLP, as the current legal advisors to the Scheme, are also a data controller. Their Privacy Notice can be accessed via their website:

[www.shoosmiths.co.uk](http://www.shoosmiths.co.uk)

### **Transfer of Personal Data to other countries**

Some of the third parties with whom your personal data is shared may be located outside the UK and outside the European Economic Area (EEA).

Under data protection legislation, the Trustee can allow your personal data to be transferred outside the UK and the EEA where:

- (a) the country to which your personal data is being transferred is deemed to provide adequate protection for personal data; or

- (b) adequate safeguards are in place as required by data protection legislation. Any third parties transferring your data outside of the EEA must also have in place adequate safeguards.

Please contact the Trustee (details below) if you require further information on the specific mechanism used in any circumstances where personal data is transferred out of the UK and EEA.

## Contacts

The main contact for the Trustee, if you have any questions or wish to exercise any of your rights listed above is:-

- In relation to Defined Contribution Section members: One Ecolab Pension Plan Trustee Limited (DC Section), Legal & General, Workplace DC Pensions, PO Box 1560, Peterborough PE1 9AP or e-mail [workplace.sar@landg.com](mailto:workplace.sar@landg.com)
- In relation to Purolite Section members: One Ecolab Pension Plan Trustee Limited (Purolite Section) c/o Quantum Advisory, Cypress House, Pascal Close, St Mellons, Cardiff CF3 0LW or e-mail [purolite@qallp.co.uk](mailto:purolite@qallp.co.uk)
- In relation to members of the Chemicals, Pest and/ or Nalco Section of the Plan: One Ecolab Pension Plan Trustee Limited c/o THPA, Ascent 4, 2 Gladiator Way, Farnborough GU14 6XN or e-mail [Ecolab@thpa.co.uk](mailto:Ecolab@thpa.co.uk)
- Ecolab Limited's Data Protection Officer at Ecolab Limited, P.O Box 11, Winnington Avenue, Northwich, Cheshire CW8 4DX; or e-mail [dataprivacy@ecolab.com](mailto:dataprivacy@ecolab.com)

ICO contact details:

- e-mail; [casework@ICO.org.uk](mailto:casework@ICO.org.uk)
- by post to: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF; or
- by telephone on: 020301123 1113 (local rate) or 01625 545745 (if you prefer to use a national rate number).

**January 2026**